Executive Director’s Recommendation
Commission Meeting: June 7, 2018

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

SUBMITTED BY
United States General Services Administration

REVIEW AUTHORITY
Approval of Master Plans for use by the Commission
per 40 U.S.C. § 8722(a) and (b)(1)

APPLICANT’S REQUEST
Approval of comments on draft master plan

PROPOSED ACTION
Approve comments on draft master plan

ACTION ITEM TYPE
Staff Presentation

PROJECT SUMMARY
The General Services Administration (GSA) has submitted a draft master plan for the US Food and Drug Administration Headquarters consolidation at the Federal Research Center (FRC) at White Oak in Silver Spring, Maryland. The FRC occupies 662 acres, of which 94 percent (622 acres) is located in Montgomery County and 6 percent (40 acres) at the eastern edge of the installation in Prince George’s County. The FRC campus is roughly 10,000 feet (1.8 miles) east-west by 3,300 feet (0.6 miles) north-south. Despite its large size, the site is environmentally constrained with limited development areas. Eight streams, including Paint Branch Creek (a major sub watershed of the Anacostia River) and the West Branch, run through the site. The existing 130-acre FDA campus is located at the west end of the larger FRC near the intersection of New Hampshire Avenue (MD 650), and Columbia Pike (Route 29), approximately 1.15 miles north of the Capital Beltway. The FRC campus is bounded by New Hampshire Avenue to the west; Cherry Hill Road to the east; commercial and residential uses, and the Paint Branch Park to the north; the US Army’s Adelphi Laboratory, Hillandale Park, and residential uses to the south.

Formerly the Naval Ordnance Laboratory (NOL) from 1944 through 1993, the site became available for other federal uses as a result of the Base Realignment and Closure Act in 1995. In 1997 the Commission reviewed the original master plan for the new home of FDA, followed by master plan updates in 2002, 2006, and 2009. The 2018 master plan is the fifth iteration of the master plan for the FDA consolidation. Today, FDA campus has a total population of 10,987 with a peak daily population of 7,793 (71 percent) due to robust telecommuting. The campus includes 3.8 million gross square feet (GSF) of laboratory and office areas; and 6,817 parking spaces (including approximately 475 visitor parking spaces), which equates to a parking ratio of one space for every 1.7 employees. In August 2017, Congress passed the FDA Reauthorization Act of 2017 (Public Law No: 115-52). This legislation reauthorized user fee programs necessary to support pre-market evaluation of prescription and generic drugs, medical devices, and biosimilar products.
Because of this, FDA is projecting an increase in employees and campus support staff of 7,013 additional employees, which includes funded staff vacancies, existing employees currently in leased space in Montgomery and Prince George’s counties, support staff, and future growth projected by 2022. GSA has developed three action alternatives to accommodate a total population of approximately 18,000 employees, and an additional 1.6 million GSF of office and special use space. Anticipating the implementation of bus-rapid-transit, parking would be provided at a ratio of 1 space for every 1.8 employees (1:1.8). The master plan includes a total on-site parking capacity of 11,709 parking spaces, including 10,094 employee parking spaces, plus 1,615 visitor parking spaces. The estimated master plan implementation ranges from 2025-2035.

KEY INFORMATION

- Since 2009, the Commission has reviewed five projects as part of the master plan implementation. These projects include the Child Care Center; Southeast Parking Garage Phase II; Southeast Quadrant Development; Expansion of the Central Utility Plant; and the Truck Screening Facility, Bus Shelters, and Interpretive Walk.
- Two parking garages previously approved by the Commission have not been built due to lack of funding, including the Southeast Garage, which has a maximum capacity of 2,700 spaces, and the Northwest Garage, which has a capacity of 585 spaces for visitors.
- The FDA campus co-exist with the natural environment. Buildings frame a central green and define a series of courtyards, against the existing wooded landscape.
- The FDA campus is not directly served by Metrorail. The site is within five miles of a number of metro stations. The closest and most accessible metro to the FDA campus is the Silver Spring station, which is 3.4 miles from the site.
- FDA has Level IV security requirements, which restrict public access beyond security checkpoints.
- The three proposed master plan alternatives have the following similarities: extending the plaza to facilitate a walkable campus; locating a conference center and transit center in the northwest quadrant; preserving the historic New Hampshire Avenue green buffer and other historic structures; anchoring the east end of the commons with iconic buildings; providing significant stormwater management; minimizing disturbances to the natural environment; providing a new northern loop road; and reconfiguring the east loop road.

RECOMMENDATION

The Commission:

Notes that the Commission last approved a master plan and transportation management plan update for the US Food and Drug Administration at the White Oak Federal Research Center in 2009.

Notes that due to the recent FDA Reauthorization Act of 2017, FDA is now 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.
Finds that FDA has successfully maintained the campus character and urban design framework that was established since the original 1997 master plan even as the campus has 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.

Notes that the Main Administration Building (Building One) is 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.

Finds that the historic view of Building One from New Hampshire Avenue has 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.

Notes that there are 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.

Notes that the site is 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.

Finds that the applicant has provided three action alternatives with differences in urban design and campus character, historic preservation, environmental impacts and program.

“Smaller Twin Towers” – Alternative C, total of five new office buildings: two 14-story buildings (218 feet), a six and a seven story building, and a two-story conference center.

Notes that Alternative C proposes 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 includes a six-story office building surrounding a two-story conference center on the northwest, and four new parking structures.

Supports Alternative C because it results in a balanced approach that generates the least amount of adverse environmental impacts, extends the original character and urban design framework of the FDA campus, minimizes adverse effects to its historic setting, and responds to the surrounding context.

Recommends that the applicant make the following changes to improve the design:

- 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.
• Provide a visual and pedestrian connection from the commons to the newly proposed courtyard at the eastern end of the campus.
• Consider programming, landscape, public art, and streetscape elements to activate the space between the two towers, and frame the east view.
• Eliminate the proposed sky bridge between the towers to preserve the view toward the east of the campus if feasible, since the buildings are already connected below the plaza level.
• Further study the view of the proposed buildings from New Hampshire Avenue and complement the symmetry and main architectural elements of Building One.

“Mid-Rises” – Alternative A, total of five new office buildings up to 10-stories tall (137 feet)

Notes that Alternative A proposes 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.

Does not support Alternative A because even though it maintains the historic viewshed of the campus from New Hampshire Avenue, it has the most significant impact on the environment, lacks an efficient and compact layout, and is not consistent with the FDA campus original urban design framework and character.

“Large Tower” – Alternative B, total of four new office buildings: one large 20-story tower (298 feet), two mid-rises, and a two-story conference center

Notes that Alternative B proposes 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 includes a six-story office building around a two-story conference center on the northwest quadrant, and three new parking structures.

Finds that Alternative B significantly changes the character of the campus and surrounding community by providing a tall architectural icon. Alternative B has greater adverse environmental and historic viewshed impacts than Alternative C, and provides the largest program of the alternatives.

Requests that, if the applicant wants to pursue Alternative B as the preferred alternative, the following information must be 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.
• 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.
Comments Applicable to all Alternatives

- The location of the dining pavilion in Alternative C within the commons (which can be accommodated in any of the alternatives) is preferable because it will further activate this large open space, promote informal interaction, and frame the viewshed toward the forested areas to the east.
- The proposed conference center surrounded by an L-shape office building, as shown in Alternatives B and C, is preferable because it takes advantage of an already disturbed site.
- The location of the distribution center below the newly extended plaza is preferable, as shown in Alternatives A and C, because this location consolidates loading areas, and is closer to the buildings and commons, yet separated from pedestrian circulation.
- Locating parking below the proposed buildings would help to reduce environmental impacts.

Parking and Transportation

Notes that 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.

Finds that 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.

Notes that the 2018 master plan includes a total on-site parking capacity of 11,709 spaces, including 10,094 employee parking spaces (based on the projected campus population of 18,000), plus 1,615 visitor parking spaces.

Notes 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 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.

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 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.
**Finds** 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.

**Notes** that the Commission defers support for the proposed footprint and number of parking spaces for this garage until it is 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.

**Requests** 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.

**General Comments**

**Requests** the applicant provide the following information with its submission for final review:

- Responses to any comments provided by the full Maryland-National Capital Park and 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 and narrative identifying environmental site design opportunities, prepared in accordance with the Commission submission guidelines, Section 438 of the Energy Independence and Security Act of 2007 (EISA), and the Maryland Department of the Environment Stormwater Management Guidelines.
- A landscape and tree preservation plan for the entire campus that addresses policies related to tree canopy and vegetation in accordance with the Federal Environment Element of the Comprehensive Plan.
### PROJECT REVIEW TIMELINE

<table>
<thead>
<tr>
<th>Previous actions</th>
<th>December 2017 – Information presentation on the master plan for the FDA Consolidation at the Federal Research Center at White Oak, and site visit.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>December 2009 – Approval of the 2009 master plan update for the FDA consolidation at White Oak Federal Research Center, and updated transportation management plan (TMP), 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>
<tr>
<td></td>
<td>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.</td>
</tr>
<tr>
<td></td>
<td>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.</td>
</tr>
</tbody>
</table>

| Remaining actions (anticipated) | November 2018 - Final Master Plan |

### PROJECT ANALYSIS

**Executive Summary**

The proposed master plan alternatives build upon the 2009 master plan update, and balance the site sensitive environmental constraints, historic preservation, and the original urban design framework to support further consolidation of FDA employees and significant projected growth. The master plan alternatives follow a common land use strategy based on expansion immediately adjacent to the existing campus. Staff supports the preferred land use strategy and its principles, which entail creating a walkable campus to promote collaboration, maintaining tree canopy and biodiversity, and converting parking lots into building pads to minimize additional impervious surface. In addition, the draft master plan includes sustainable site and building features such as green roofs, rooftop solar panels, permeable paving, and bio-retention areas. Therefore, the draft master plan is consistent with the *Comprehensive Plan for the National Capital*. In particular the

**Analysis**

Staff analysis on the draft master plan alternatives focus on urban design and campus character, historic preservation, environmental impacts, parking and transportation considerations. In addition it evaluates how the master plan complies with relevant guidance included in the Comprehensive Plan for the National Capital.

**Previous Commission Actions**

The Commission originally reviewed a master plan for the campus in 1997. Since then, the Commission has reviewed three master plan updates (2002, 2006, and 2009). Staff notes that the Commission last approved a master plan and transportation management plan update for the US Food and Drug Administration at the White Oak Federal Research Center in 2009.

The *Federal Workplace Element* includes policies related to developing and managing federal workplaces that encourage agencies to review master plans at least every five years to ensure that both inventory material and development proposals are current. The last FDA master plan update was developed eight years ago, which is generally consistent with this guidance. FDA has prepared a revision to the master plan that reflects changed conditions and provides a current plan for the facility’s development. In addition, the Workplace Element encourages federal campuses to be compatible with the character of the surrounding community, and where feasible, advance local planning objectives, such as the Montgomery County’s 2014 White Oak Science Gateway Master Plan (WOSG).

In 2009, the Commission required additional justification to support the proposed increase in visitor parking spaces from 500 to 1000 spaces prior to submitting any future projects on the campus. Regarding the updated transportation management plan (TMP), the Commission provided three conditions:

1. Continue working with the local and regional transit agencies to develop and expand the number of buses and shuttles coming to the site by continuing to allow Metrobus and Ride-On routes to use the main entryway at FDA to make transit connections easier, and supporting the initiation of cross-county public express bus service between Montgomery County and the White Oak site.
2. Provide an updated TMP submission in 2011, prior to completion of the campus.
3. 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 5926, which is based on the projected campus population of 8,889.

Since the 2009 master plan update approval, NCPC has reviewed and approved the following five projects as part of the master implementation:

1. Southeast Quadrant Development (NCPC File No. 7030), February 4, 2010
2. Child Care Center (NCPC File No. 7031), February 4, 2010
3. Southeast Parking Garage Expansion Phase II (NCPC File No. 7047), February 4, 2010
4. Expansion of the Central Utility Plant (NCPC File No. 7155), November 4, 2010
5. Truck Screening Facility, Bus Shelters, and Interpretive Walk (NCPC File No. 7221), April 7, 2011.

From those approved projects, FDA has completed the Southeast Quadrant Development (1,230,000 GSF of new office and laboratory space), the Child Care Center (21,000 square feet), the Central Utility Plant Expansion (50,000 square feet), landscaping of the commons and two courtyards, perimeter security, and five major art installations. The projects that have not been completed include: two parking garages (Southeast Garage Phase I and II with a total of 2,700 spaces, and Northwest Garage with 585 spaces); Building 25 (180,000 square feet); Distribution Center (97,000 square feet); Broadcast Studio (25,000 square feet); and Fitness Center (10,000 square feet).

As mentioned above, the Commission approved the preliminary and final site and building plans for the Southeast parking garage expansion phase II in February 2010. Phase II included 996 parking spaces added to the approximate 1,700 parking spaces included in phase I. Phase I was approved by the Commission in December 2008 (NCPC File No. 6888). The seven-story parking garage would serve the offices and laboratories in the Southeast Quadrant, and included a total of 2,700 parking spaces (including phase I and II). The parking garage was not built due to lack of funding. However, this parking structure has been included in the current draft master plan in Alternatives B and C.

Urban Design Framework

The original master plan successfully provided a strong urban design and landscape framework while allowing flexibility for growth. As a result, when comparing the four previous master plans (1997, 2002, 2006 and 2009), the main components have not significantly changed. Although building footprints have been added and modified overtime, they still frame a distinctive open space network, composed of a large central commons, which measures approximately 260 feet wide by 990 feet long, and human scale courtyards.

As such, staff finds that FDA has successfully maintained the campus character and urban design framework that was established since the original 1997 master plan even as the campus has 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.

The Urban Design Element includes policies related to federal facilities that encourage the federal government to provide an inspiring design for federal campuses, and integrate federal campuses within the surrounding community. These policies encourage agencies to address specific urban design issues through regular master plan updates, in consultation with local government and the Commission, to respond to changing conditions and agency needs. GSA and FDA have continued to engage the public and government agencies throughout the master plan process. The draft master
Executive Director’s Recommendation
NCPC File No. MP201

plan adequately analyzes the existing campus characteristics and surroundings, proposes urban design policies, includes a strategy for the site and design of main functions, and support functions. In addition, the proposed alternatives implement sustainable site and building design, and achieve a balance between iconic design and infill design as appropriate to the setting.

Historic Preservation

The Historic Preservation Element encourages agencies to ensure that new construction is compatible with the qualities and character of historic buildings and their settings. It also includes policies that encourage agencies to protect the settings of historic properties (including viewsheds, greenspaces, and tree canopies), as integral parts of the property’s historic character.

Historic preservation has played an important role since the beginning of the master planning process 21 years ago. Historically, the Naval Research Facility consisted of a complex of buildings aligned with a circular drop off, with a large wooded area to the east of the campus. This large natural resource has influenced the landscape design within the campus. Today, the FDA campus retains four contributing resources: two buildings, a flagpole, and a former golf course. The golf course (built in 1952) serves as green buffer along New Hampshire Avenue. Building One – Administration Building/Lab Base, built in 1945, serves as the main entrance and Office of the Commissioner. Building 100 - fire station, built in 1946, serves as the new Central Utility Plant. The flagpole (built in 1946) has been integrated into the main entry. All the other office and laboratory buildings were planned as new construction projects.

The symmetrical Building One remains at the west end of the campus anchoring the commons, and serving as the central focus of the campus from New Hampshire Avenue. In addition, the circle and flagpole in front of Building One, as well as the symmetrical Mahan Road establish an appropriate setting by referencing the historic landscape. The viewshed from New Hampshire Avenue has been maintained by locating buildings taller than Building One further to the east to avoid projecting above the historic building. The topography steps down gradually to the east away from Building One. The central commons measures about ¼ mile in length from Building One. In return, the new buildings respond to the topography by stepping up gradually toward the east end of the commons. Staff notes that the Main Administration Building (Building One) is 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.

Staff finds that the historic view of Building One from New Hampshire Avenue has 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.

Existing and Planned Development near FRC

White Oak is a rapidly developing area. There are several existing high-rise residential buildings in the immediate vicinity of the campus. For example, the Enclave Apartments, located at the
intersection of Columbia Pike and New Hampshire Avenue, consist of three 19-story towers, and the White Oak Towers, located along Columbia Pike, is 22 stories. The parcels to the north of the campus were rezoned in 2014 as part of the White Oak Science Gateway Master Plan (WOSG). The new map amendment allows commercial residential uses with a maximum height of 200 feet at the White Oak Shopping Center along New Hampshire Avenue, and 220 feet at the future Viva White Oak development along Cherry Hill Road. Adopted by the Maryland National Capital Park and Planning Commission (M-NCPPC), the WOSG master plan area spans nearly 3,000 acres, and includes FDA campus as the centerpiece. FDA is considered as a catalyst to attract employers in health care, pharmaceuticals, life sciences, and other advanced technology fields.

Other future development in the immediate vicinity includes the eight-story Washington Adventist Hospital, a 49-acre health care campus; and Viva White Oak, a 300-acre mixed use development located to the north of the FRC property featuring office space, residences, and retail. Therefore, staff notes that there are 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.

Environmental Constraints

The FDA campus sits in a unique natural setting. The main topographical feature is the Paint Branch stream valley, creating hills over 100 feet high. The lowest point on the property is located along the Paint Branch. Tributary streams to the Paint Branch create dynamic conditions on the central portions of the FRC. The highest point on the property is the northwest corner of the site, adjacent to the US 29 / New Hampshire Avenue interchange. East of Paint Branch is another stream valley belonging to the West Branch. Steep slopes areas are located along stream valley buffers, primarily the Paint Branch, the West Branch, and their smaller tributaries.

The FRC has a significant amount of forested areas. Based on the Forest Stand Delineation Report (appendix C of the February 2018 DEIS), a total of seven forest stands were identified during field investigations within a 148-acre study area in consideration of the proposed master plan. The total acreage of the forest stands within the study area was 26.8 acres.

The Paint Branch Stream Valley Park located to the north of the FRC, consist approximately of 1,000 acres along the sensitive Paint Branch stream valley. The Paint Branch stream bisects the FRC from north to south; however, the existing Paint Branch Trail located along the Paint Branch Stream does not continue through the campus. Staff notes that the site is environmentally constrained with a total of eight streams running through the site, including the Paint Branch Creek and its tributaries. Other constraints includes stream valley buffers, steep slopes, and forested areas.

Proposed Master Plan

Staff notes that due to the recent FDA Reauthorization Act of 2017, FDA is now 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. When comparing the 2009 approved master
plan to the 2018 proposed master plans, it is evident that the campus population and parking will almost double, as shown in Table 1 below.

Prior to developing the master plan alternatives, the applicant analyzed four land use feasibility strategies to accommodate the desired program: 1) expansion immediately adjacent to the existing campus, 2) development of a new campus central to the overall FRC property, 3) development of a new satellite campus on the Eastern portion of the FRC property, and 4) no new development, other than providing required parking spaces to maximize existing capacity. The applicant selected strategy 1 to test three action alternatives.

<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>10,094 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 (employee plus visitor)</td>
<td>6,926 spaces</td>
<td>6,816 spaces</td>
<td>11,709 spaces</td>
</tr>
<tr>
<td>Total gross square footage (including parking, labs, office and special use)</td>
<td>5.8 million</td>
<td>4.8 million</td>
<td>6.4 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: Campus Development*

The proposed action alternatives include the following components:
- A new traffic circle at Blandy Road and FDA Boulevard to connect the Southeast Loop Road.
- A distribution center located either under the new plaza connecting the new development with the existing Campus or adjacent to the Northeast parking garage.
- A cafeteria located either within the new courtyard or as a stand-alone pavilion at the commons area.
- A truck screening facility located at the entrance to the FDA Campus on Michelson Road.
- A transit center located on existing northwest surface lot.
- Preserving the historic New Hampshire Avenue green buffer.
- Reconfiguring the East Loop Road to circle around the new office buildings to connect to Blandy Road.

*Master Plan Alternatives*

Staff finds that the applicant has provided three action alternatives with differences in urban design and campus character, historic preservation, environmental impacts and program. As shown in table 2, overall the proposed alternatives provide the same program for office, transit center, truck screening, and distribution center. However, Alternative B provides more special uses, including a larger communication center.
### New Building Area (GSF)

<table>
<thead>
<tr>
<th>New Building Area</th>
<th>Alternative A</th>
<th>Alternative B</th>
<th>Alternative C</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Mid-rises (up to 10 stories)</td>
<td>Large Tower (up to 20 stories)</td>
<td>Smaller Twin Towers (up to 14 stories)</td>
</tr>
<tr>
<td>Communication Center</td>
<td>74,055</td>
<td>91,110</td>
<td>77,153</td>
</tr>
<tr>
<td>Transit Center</td>
<td>23,250</td>
<td>23,250</td>
<td>23,250</td>
</tr>
<tr>
<td>Conference Center</td>
<td>64,583</td>
<td>75,347</td>
<td>75,347</td>
</tr>
<tr>
<td>Truck Screening</td>
<td>9,400</td>
<td>9,400</td>
<td>9,400</td>
</tr>
<tr>
<td>Distribution Center</td>
<td>96,875</td>
<td>96,875</td>
<td>96,875</td>
</tr>
<tr>
<td>Other Special/Shared Use</td>
<td>160,683</td>
<td>261,543</td>
<td>145,829</td>
</tr>
<tr>
<td><strong>Total Special Use and Shared Use</strong></td>
<td>419,446</td>
<td>557,525</td>
<td>427,854</td>
</tr>
<tr>
<td><strong>Total Office</strong></td>
<td>1,169,715</td>
<td>1,191,309</td>
<td>1,145,270</td>
</tr>
<tr>
<td><strong>Total New Building Area (Office and Special Use)</strong></td>
<td>1,589,161</td>
<td>1,748,834</td>
<td>1,573,124</td>
</tr>
<tr>
<td>Parking Spaces</td>
<td>7,064 spaces in 4 new parking structures</td>
<td>7,073 spaces in 3 new parking structures*</td>
<td>7,141 spaces in 4 new parking structures*</td>
</tr>
<tr>
<td><strong>parking ratio 1:1.8</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(New parking includes replacement of existing parking displaced by new buildings)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Includes previously designed SE parking garage

<table>
<thead>
<tr>
<th></th>
<th>Alternative A</th>
<th>Alternative B</th>
<th>Alternative C</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total Special Use and Shared Use</strong></td>
<td>419,446</td>
<td>557,525</td>
<td>427,854</td>
</tr>
<tr>
<td><strong>Total Office</strong></td>
<td>1,169,715</td>
<td>1,191,309</td>
<td>1,145,270</td>
</tr>
<tr>
<td><strong>Total New Building Area (Office and Special Use)</strong></td>
<td>1,589,161</td>
<td>1,748,834</td>
<td>1,573,124</td>
</tr>
</tbody>
</table>

### Table 2: Program comparison among the three action alternatives

The following analysis summarizes how each alternative respond to three relevant topics: urban design, historic preservation, and environmental impacts.

**“Smaller Twin Towers” – Alternative C, total of five new office buildings: two 14-story buildings (218 feet), a six and seven story building, and a two-story conference center.**

Staff notes that Alternative C proposes 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 includes a six-story office building surrounding a two-story conference center on the northwest, and four new parking structures.

Staff provides the following findings regarding Alternative C:

1. **Urban Design**
   - Alternative C is consistent with the height of the existing and future development of the surrounding area.
   - The proposed height is taller yet still compatible with the scale of the existing campus. It will maintain the human scale while creating architectural interest.
• The design maintains a view of approximately 72 feet wide between the proposed 14-story buildings towards the forested areas to the east. The viewshed is centered on the historic planning axis from the 1940s, similar to Alternative B.
• The building footprints incorporate the two axes that define the commons; however, the proposed enclosed courtyard is not connected to the commons.

2. Historic Preservation
• The proposed towers will be visible from New Hampshire Avenue, as they will be taller than Building One. The towers will affect the historic view of the campus, however they will be less prominent than the single tower in Alternative B.

3. Environmental Impacts
• It will have the least amount of impacts related to forest removal, and permanent stream valley buffers from all the alternatives.
• It will result in the same impacts to land disturbance area, streams, and impervious areas as Alternative B.
• It will generate less impact to steep slopes disturbance than Alternative B, but more than Alternative A.

Based on the findings, staff supports Alternative C because it results in a balanced approach that generates the least amount of adverse environmental impacts, extends the original character and urban design framework of the FDA campus, minimizes adverse effects to its historic setting, and responds to the surrounding context.

Recommends that the applicant make the following changes to improve the design:
• 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.
• Provide a visual and pedestrian connection from the commons to the newly proposed courtyard at the eastern end of the campus.
• Consider programming, landscape, public art, and streetscape elements to activate the space between the two towers, and frame the east view.
• Eliminate the proposed sky bridge between the towers to preserve the view toward the east of the campus if feasible, since the buildings are already connected below the plaza level.
• Further study the view of the proposed buildings from New Hampshire Avenue and complement the symmetry and main architectural elements of Building One.

“Mid-Rises” – Alternative A, total of five new office buildings up to 10-stories tall (137 feet)

Staff notes that Alternative A proposes 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.

Staff provides the following findings regarding Alternative A:
1. Urban Design
   • While it maintains the existing building heights and reinforces the courtyard concept, it blocks the expansive views to the forested areas to the east.
   • It does not fully integrate the two existing planning axes that define the commons. While some of the proposed buildings anchoring the east end of the commons follow the angle of the secondary axis, other buildings do not respond to the central axis from Building One, undermining the original composition.
   • It lacks an efficient and compact layout. For example, it does not take full advantage of the already disturbed area around the proposed conference center; and it places a large building outside the ¼ mile walking radius, without a direct connection to the commons.

2. Historic Preservation
   • It maintains the historic viewshed of Building One from New Hampshire Avenue. Although the proposed buildings are taller than Building One, they do not project above it due to the topography.

3. Environmental Impacts
   • It generates the greatest adverse environmental impacts to streams, stream valley buffers and vegetation; and it requires the largest amount of land disturbance and impervious surfaces.
   • It requires a long pedestrian bridge (approximately 410-foot long) over a stream, which intensifies impacts to stream valley buffers.
   • It is the only alternative that results in permanent impacts to wetlands due to the construction of the proposed parking structure south of Dahlgren Road and the extension of Southwest Loop Road.

Based on the findings, staff **does not support Alternative A because even though it maintains the historic viewshed of the campus from New Hampshire Avenue, it has the most significant impact on the environment, lacks an efficient and compact layout, and is not consistent with the FDA campus original urban design framework and character.**

“Large Tower” — **Alternative B, total of four new office buildings: one large 20-story tower (298 feet), two mid-rises, and a two-story conference center**

Staff notes that Alternative B proposes 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 includes a six-story office building around a two-story conference center on the northwest quadrant, and three new parking structures.

Staff provides the following findings regarding Alternative B:

1. Urban Design
• Although the tower will anchor the eastern edge of the campus, and provide variation, it will affect the human scale that has been maintained throughout the evolution of the campus.
• Alternative B is not consistent with the height of the existing and future development of the surrounding area since the proposed tower is significantly higher.
• The tower will be visible from New Hampshire Avenue, Columbia Pike (Route 29), and the Capital Beltway, affecting the identity of the campus in the surrounding community.
• The 98-foot opening between the proposed tower and the mid-rise building will maintain the vista towards the forested areas to the east. The viewshed is centered on the historic planning axis from the 1940s.
• The building footprints integrate the two axes that define the commons and extend the courtyard concept, providing a cohesive site plan.

2. Historic Preservation
• The proposed tower will be significantly taller than the historic Building One, and its placement will affect the symmetry of the historic viewshed from New Hampshire Avenue resulting in an adverse effect to historic properties.

3. Environmental Impacts
• It will generate the greatest amount of steep slopes disturbance when compared to the other two alternatives.
• It will require less forest removal and impacts to stream valley buffers than Alternative A but more than Alternative C.
• The impacts to land disturbance area, streams, and impervious areas are equal to Alternative C.

Finds that Alternative B significantly changes the character of the campus and surrounding community by providing a tall architectural icon. Alternative B has greater adverse environmental and historic viewshed impacts than Alternative C, and provides the largest program of the alternatives.

Requests that, if the applicant wants to pursue Alternative B as the preferred alternative, they need to provide the following 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.
• 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.

Comments Applicable to all Alternatives

According to the submission materials, the location of the distribution center and cafeteria are independent decisions that could be interchangeable among the alternatives.
- Dining Pavilion/Cafeteria: The master plan includes two potential locations for a new cafeteria. One option locates the new cafeteria within the proposed courtyard as shown in alternatives A, and B, and the other option includes a free-standing dining pavilion located within the commons area, as shown in alternative C. **The location of the dining pavilion in Alternative C within the commons (which can be accommodated in any of the alternatives) is preferable because it will further activate this large open space, promote informal interaction, and frame the viewshed toward the forested areas to the east.**

- Distribution Center: The distribution center was included in the 2009 master plan adjacent to the 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 current draft master plan proposes 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 update, adjacent to the Northeast Parking Garage (alternatives B). In both cases, the distribution center would connect directly into the existing tunnel network. Staff encourages the applicant to consolidate access to public facilities and minimize curb cuts, where possible. As such, **the location of the distribution center below the newly extended plaza is preferable, as shown in Alternatives A and C, because this location consolidates loading areas, and is closer to the buildings and commons, yet separated from pedestrian circulation.**

- The proposed conference center surrounded by an L-shape office building, as shown in Alternatives B and C, is preferable because it takes advantage of an already disturbed site.

- Locating parking below the proposed buildings would help to reduce environmental impacts.

Parking and Transportation

The Transportation Element includes policies related to integrated regional transit, which encourage the federal government to support the efforts of local jurisdictions to design and implement new, expanded, and innovative transit services that supplement existing transit and fill unmet transit needs (i.e. bus rapid transit, light rail, bikeshare stations, and vehicle-sharing services). Montgomery County is planning two BRT lines adjacent to the site:

- **US-29 Colesville Road:** Operating along US 29 between the Silver Spring Transit Center and the Burtonsville Park-and-Ride. The closest planned stop to the White Oak Campus would be the White Oak Transit Center on Lockwood Drive. The route along US-29 is projected to be in operation by 2020.

- **New Hampshire Avenue:** Operating along New Hampshire Avenue between the Colesville Park and Ride and the DC city line. There is a planned stop on the White Oak Campus. Currently there is no anticipated implementation date for the New Hampshire Avenue BRT line. This corridor is anticipated to come online within the next 10 to 15 years.

The Transportation Element also includes policies related to parking and parking ratios. For suburban federal facilities beyond 2,000 feet of a Metrorail station, such as FDA, the parking ratio will reflect a phased approach linked to planned improvements over time (1:1.5-1:2). The proposed
ratio is 1:1.8, therefore it is within the range prescribed by the Comprehensive Plan. Consistent with the Federal Element, the master plan alternatives include a compact development, implement sustainable building design, stormwater management practices and promote development on previously disturbed sites.

Based on NCPC’s submission guidelines a transportation management plan (TMP) is required for all master plan updates. A draft of the TMP is due for the draft master plan submission. In general, the TMP is consistent with the policies included in the Transportation Element. The TMP encourages employee commuting and work-related travel by modes other than single-occupancy vehicle, and evaluate opportunities for alternative transportation modes, such as transit, carpooling, and vanpooling. The TMP explore strategies that meet the prescribed parking ratio.

Once completed, the White Oak Campus will house one of the largest concentrations of Federal workers in the Washington, DC area on a campus that is not directly served by high-capacity transit, such as Metrorail. Six bus routes, operated by Metrobus, Montgomery County RideOn, and MTA, serve the campus. In addition to public transit, FDA also operates six shuttle routes to Metrorail stations including Twinbrook, Shady Grove, Medical Center, Glenmont, Silver Spring, and College Park. The proposed BRT and Purple Line will enhance transit mode share on the White Oak Campus.

Notes that 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.

Finds that 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.

Notes that the 2018 master plan includes a total on-site parking capacity of 11,709 total parking spaces, including 10,094 employee parking spaces (based on the projected campus population of 18,000), plus 1,615 visitor parking spaces. This equates approximately to a parking ratio of one space for every 1.8 employees.

Notes 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 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.

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 the proposed parking garage (~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.

**Finds** 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.

**Notes** that the Commission defers support for the proposed footprint and number of parking spaces for this garage until it is able to evaluate improvements to the local/regional network and an update of the TMP closer to the time of design and construction.

**Requests** that the Transportation Management Plan (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.
- 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 dockless bikes on campus.
- Establish an internal bike-share system throughout the FDA campus and surrounding nearby community.
- 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.
- Submit a pedestrian, bike, and vehicular circulation diagram for the entire FRC site, taking into consideration connectivity improvements between the campus and Lockwood Drive.

**General Comments**

**Requests** the applicant provide the following information with its submission for final review:

- Responses to any comments provided by the Maryland-National Capital Park and Planning Commission (M-NCP), 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 and narrative identifying environmental site design opportunities, prepared in accordance with the Commission submission guidelines,
Section 438 of the Energy Independence and Security Act of 2007 (EISA), and the Maryland Department of the Environment.

- A landscape and tree preservation plan for the entire campus that addresses policies related to tree canopy and vegetation in accordance with the Federal Environment Element of the Comprehensive Plan.

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

As noted above, the project meets basic goals of the Comprehensive Plan.

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 NHPA.

The Naval Ordnance Laboratory (NOL) Historic District was determined eligible for inclusion in the National Register of Historic Places in 1997. 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/Maryland Historic Trust (MHT) 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 One (Administration Building), Building 100 (Fire House) and the flagpole. Following completion of the MOA, nearly all the resources in the 300 and 600 area were removed. Historic resources remain in the 200 and 400 areas.

The 2002 MOA is still in effect until it is terminated or a new MOA is negotiated. The 2002 MOA design review stipulations, requested that GSA consult with the MHT to ensure that the design plans of proposed buildings are “compatible with neighboring historic buildings in terms of their height, scale, massing, and materials.” Under the 2002 MOA, the signatories established compatibility standards for future development at the Federal Research Center that have been adhered to throughout subsequent master plans (2006, 2009). Since this is a new master plan, GSA intends to close out the existing MOA. Due to the master plan phased approach and unknown adverse effects that might result from the preferred alternative, GSA will negotiate a new
Programmatic Agreement (PA) to mitigate any adverse effects to the historic buildings or landscapes. GSA also intends to carry forward the compatibility standards established under the 2002 MOA to the new PA. No historic resources within either the primary or secondary APE are expected to be physically affected by the planned construction under the master plan alternatives. Under Alternatives B and C, the construction of a high-rise tower (B) or twin towers (C) would represent a departure from the compatibility standards established under the 2002 MOA.

Three consulting parties meeting have been conducted so far (refer to table 3 below). The PA will be finalized in August 2018, prior to the Record of Decision (ROD).

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

*Table 3: 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, conducted public scoping in summer 2017 and prepared a Draft Environmental Impact Statement (DEIS) in February 2018 to analyze the potential impacts from the proposed master plan. NCPC provided scoping comments on September 25, 2017, and comments on the DEIS on April 18, 2018. The DEIS did not identify a preferred alternative. GSA will publish a final EIS in July 2018 for a 30-day public comment, and release the ROD in September 2018.

<table>
<thead>
<tr>
<th>Meeting Date</th>
<th>Discussion Topic</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 September 12, 2017</td>
<td>Public Scoping Meeting</td>
</tr>
<tr>
<td>2 March 22, 2018</td>
<td>Findings on DEIS</td>
</tr>
</tbody>
</table>

*Table 4: List of Public Meetings for NEPA purposes*

**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. The inter-agency comments received are attached at the end of this report, and a summary is provided below.
Maryland National Capital Park and Planning Commission (M-NCPPC)

At its May 16, 2018 meeting, the full Maryland-National Capital Park and Planning Commission (M-NCPPC), including Montgomery and Prince George’s counties, reviewed the mandatory referral for the proposed master plan. By letter dated May 22, 2018, M-NCPPC transmitted consolidated comments from both counties to NCPC. The major topics identified in the staff reports included: parking ratio, implementation of BRT and commuter bus routes, connections through the FRC site, access and recreational amenities for the green buffer (former golf course). Below is a summary of M-NCPPC’s main comments:

- Requests that the number of parking spaces per employee be set at ratios that seek to reduce single-occupancy vehicle trips in order to help relieve congestion in the White Oak area. The M-NCPPC acknowledges NCPC’s role in determining the final ratio for the FDA campus. Consistent with NCPC Comprehensive Plan, as teleworking trends continue to increase regionally, and to support the goals of reducing single occupancy vehicles trips and support transit ridership, the final EIS should include 1 parking space per 2 employees.
- Looks forward to working with GSA on the implementation of Bus Rapid Transit on New Hampshire Avenue and US 29. In particular, federal funding for BRT on New Hampshire Avenue is essential to ensure that FDA’s growth does not overwhelm the area’s transportation network.
- Requests that GSA work with the Maryland Department of Transportation to provide opportunities for commuter bus routes to the FDA campus.
- Requests that the applicant explore options to provide additional east-west connections through the FRC site that would disperse traffic, reduce pressure on the road network, and provide additional options for access to and from the site.
- Requests that the applicant maximize access, and provide both active and passive recreational use within the green buffer space along New Hampshire Avenue (the former golf course) to the extent practicable, and encourage coordination of such full-bodied recreational efforts with M-NCPPC’s Montgomery County Department of Parks.

Other comments provided by the Montgomery County Planning Department during its May 3, 2018 meeting include the following five topics: environment (sewer capacity, stormwater management, and forest loss), transportation, historic preservation, parks and open space, and the preparation of an MOU:

**Environment**

- Coordinate with developers of neighboring properties and the county to address the necessary sewer expansion to avoid overflow.
- Stormwater facilities should be located toward the interior of the campus and not in the stream valley buffers. The relocated stormwater management facility #3 included in all the alternatives, should not be located within the stream valley buffer.
- Provide diagrams that show the areas proposed for clearing, planting forest on steep slopes in stream valley buffers is the preferred mitigation for forest loss.
Transportation

- To mitigate traffic congestion, FDA should include significant contributions for major transportation projects, including: BRT on New Hampshire Avenue, future BRT transit station in the White Oak Center, connection from FDA’s campus to the White Oak Center (along Lockwood Drive), and MCDOT bike sharing efforts with stations on the FDA campus.
- The 2014 WOSG master plan included a planned pedestrian and bicycle link between the White Oak Center and FDA campus. In addition, a vehicular connection in this location will improve transportation access.
- Explore pedestrian connections, open space design, building placement, and roadway improvements between the FDA campus, the White Oak Center, and Viva White Oak Development.
- Ensure all sidewalks are upgraded to at least five feet in width; create a five-foot-wide minimum buffer between the shared-use paths and the street; upgrade the bikeway on the FDA side of New Hampshire Avenue to a ten-foot-wide shared-use path with a minimum five-foot-wide buffer.
- In all action alternatives impacts to traffic are increased by the inclusion of the East Parking Garage.

Historic Preservation

- The revised Section 106 agreement should address contributing resources to the NOL district, the viewshed from New Hampshire Avenue, and the amenity located within the green buffer, former golf course.

Parks and Open Space

- Explore opportunities to expand recreation amenities at Hillandale Local Park.

Memorandum of Understanding

- Discuss the potential for a Memorandum of Understanding (MOU) to include the mitigation recommendations outlined in the Montgomery County’s staff report after the final EIS.

Maryland Historical Trust (MD SHPO)

The MD SHPO provided a comment letter on April 6, 2018 concurring with GSA’s initial assessment of effects. They agreed that Alternatives B and C, both of which include taller office buildings, would have adverse effects on the historic resources. The MD SHPO will continue consultation with GSA and other consulting parties to complete the Section 106 process. Noting that resolution of adverse effects may include a signed Memorandum of Agreement or Programmatic Agreement (PA), they encouraged GSA and FDA to coordinate with the Trust and the Advisory Council on Historic Preservation (ACHP) to determine the appropriate agreement document for this undertaking. As mentioned above in the NHPA section, during the most recent
consulting parties meeting on May 21, 2018, the signatories agreed that a PA would be the appropriate agreement document for this master plan.

**Maryland Department of Transportation (MDOT)**

The Maryland Department of Transportation provided detail technical comments on the DEIS on April 16, 2018. The comments were organized in the following 11 topics: funding and implementation, major capital projects, parking ratio, survey data, telework, trip distribution, publicly accessible streets, non-auto analysis, transit center, bikeshare, and TMP.

Regarding parking, MDOT noted that while a ratio of 1:1.8 is reasonable early on, as non-auto facilities and programs are implemented this ratio should be designed to approach 1:2.0 toward the later stages of the site’s development. Development of the site and associated parking should be properly phased to ensure that the parking supply does not exceed the ratios set for the project.

**Maryland Department of Transportation State Highway Administration (MDOT SHA)**

The Maryland Department of Transportation State Highway Administration provided a comment letter on DEIS on April 16, 2018. The comments focused on the transportation technical report and TMP.

**Maryland Department of Environment (MDE)**

In general, the Maryland Department of the Environment (MDE) found this project to be consistent with their plans, programs, and objectives. MDE provided comments regarding the installation, maintenance and demolition of petroleum storage tanks, disposal of solid and hazardous waste, lead paint abatement, and redevelopment of industrial property (brownfields site assessments and voluntary cleanup). The comments are summarized below:

- Any above ground petroleum storage tanks must be installed and maintained in accordance with applicable state and federal laws and regulations. If demolition of storage tanks is required, contents and tanks along with any contamination must be removed.
- Any solid waste including construction, demolition and land clearing debris, generated from the project must be properly disposed at a permitted solid waste acceptance facility, or recycled if possible. The treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility should be conducted in compliance with applicable state and federal laws.
- Any contract specifying lead paint abatement must comply with Code of Maryland Regulations.
- MDE’s brownfields site assessments and voluntary cleanup program may provide valuable assistance since the project involves redevelopment of an industrial property.
Maryland Department of Natural Resources

By letter dated April 4, 2018, the Wildlife and Heritage Service determined that there were no official state or federal records for listed plant or animal species within the project area. As a result, they have no specific concerns regarding potential impacts or recommendations for protection measures.

Montgomery County Council

Councilmember Tom Hucker provided a comment letter on May 15, 2018 to NCPC expressing concerns about the potential transportation and public safety impacts resulting from the master plan. The letter includes the following improvements to the proposed master plan for NCPC’s consideration:

- 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;
- Include a public connection from New Hampshire Avenue through the FDA campus to either Viva White Oak or Cherry Hill Road;
- Participate in the county transportation management program to reduce traffic by encouraging telework, flexible hours, and non-auto driver modes of transportation;
- Allow a county Bikeshare station on FDA campus to connect with other bike nodes in the area;
- Provide funding for the New Hampshire Avenue BRT line, which the Council is funding for planning and design in the FY19-24 CIP;
- Engage the county and the Hillandale Volunteer Fire Department on the possible purchase of additional land for four apparatus bays to continue meeting the fire safety needs of the community;
- Explore a possible MOU with the Planning Department, County Department of Transportation, and State Highway Administration for the master plan implementation.

ONLINE REFERENCE

The following supporting documents for this project are available online:

- Submission Package

ATTACHMENTS

1. Powerpoint
2. Inter-agency Referral Comments, including Maryland-National Capital Park and Planning Commission, May 22, 2018 Public Hearing, and other government agencies.
3. Letter from Montgomery County Councilmember Tom Hucker
4. Public Comments from Gail Fisher (Hillandale Resident) and Bernard Berne (Current FDA Employee)
ATTACHMENT 1
NCPC File # MP 201
Draft Master Plan for the Food and Drug Administration Headquarters Consolidation at the Federal Research Center, White Oak

10903 New Hampshire Avenue
Silver Spring, Maryland

General Services Administration (GSA)

Draft
Planned Developments near FRC

1. Washington Adventist Hospital

8. Viva White Oak

- Federal Research Campus

Legend:
- Single Family
- Multi Family
- Retail / Mixed Use
- Academic
- Public/Office Center
- Civic
Development Areas and Constraints
Figure 1-7: Zoning

Montgomery County
- RE-1 (Residential Resort)
- RE-2 (Residential Estate)
- R-90 (Moderate Density Single Family)
- R-20 (Multi-family/High Density Residential)

Prince Georges County
- ROS (Reservoir Open Space)
- R-80 (One-Family Detached Residential)
- R-30 (Multi-family Low Density Residential)
- R-18 (Multi-family High Density Residential)

Zoning Types:
- RT5.0 (Residential Townhouse)
- R-H (High-Rise Residential)
- CRT (Commercial Residential Town)
- CR (Commercial Residential)
The Enclave Apartments
19 Floors R-H ZONING

White Oak Shopping Center
CR ZONING 200’ Height

White Oak Tower
23 Floors

Hillendale Gateway

Viva White Oak
CR ZONING 220’ Height

Hillendale Shopping Center

Figure 1-4: SURROUNDING COMMUNITY & CONTEXT
2009 Master Plan Implementation

Projects completed since 2009 Master Plan:

1. SE Quad 1,230,000 GSF
2. Child Care Center
3. CUP Expansion
4. Landscaping of the Commons & 2 courtyards
   Perimeter Security (Not Keyed to plan)
   Five Major Art Installations (Not Keyed to plan)

Projects that have not been completed:

1. Southeast Garage - 2,700 spaces
2. Building 25 – 180,000 SF
3. Distribution Center – 88,000 SF
4. Broadcast Studio
5. Fitness Center
6. Northwest Garage
Figure 1-9: Property Boundary, Areas & Places of Interest
Existing Conditions: FDA Campus

1. Entry roundabout, Front Lawn, Buildings 21 and Building 1
2. Buildings 2 and 32
3. Commons Area, Building 71, and Building 50/72
Existing Conditions: FDA Campus
Existing Conditions: Central Campus

1. Former Defence Nuclear Agency Casino Facility
2. Former Operations Lab in Magnetics Area
3. Former Large Projects Laboratory and Model Laboratory
Existing Conditions: Central Campus

- Bluff east of East Loop surface parking lot
- Supersonic Wind Tunnel Building
- Vacuum Spheres and Hydrodynamics Tank Building
- Northern Perimeter Road
- Ruins of wooden bridge over Plant Branch
- Plant Branch, new Daillynes Road Bridge, and Undliesse Weapons Tank
Existing Conditions: Eastern Campus

1. View of existing overhead power lines and clearing
2. Concrete retaining wall near Paint Branch
3. View looking north towards Viva White Oak site
Existing Conditions: Eastern Campus

- Concrete retaining walls for explosives magazines (removed)
- FDA Boulevard looking west
- Former Air Blast Field Lab
- Chart/Image Title
- The former 50-Pound Bombproof Facility
- The central intersection of the 600 area
Figure 1-14: Site Topography

- 2' contours
- 20' contours

Key:
- 400'
- 300'
- 200'
- 100'
- Site Boundary
Figure 1.15: Steep Slopes

- 2' contours
- 20' contours
- Slope Between 15-25%
- Slope Greater than 25%
- Contours
- Site Boundary

Steep Slopes
Historic Resources

- Former Naval Ordnance Laboratory Main Building
- Former Naval Ordnance Laboratory Fire Station
- Former Supersonic Tunnel Infrastructure
- Former Magnetic Research Facility
- Current AEDC Wind Tunnel Facility
- Former Dahlgren Road bridge and Free Fall Drop Tower
Figure 1-18: Parking, Pedestrian, & Bicycle Network

1. Northeast & North Parking Garage
2. Southwest Parking Garage
3. Northeast Surface Parking 2
4. Visitor Parking Lot
5. Northwest Surface Parking 1, 2, & 3
6. Northeast Surface Parking 1
7. Southwest Surface Parking
8. East Loop Road Surface Parking
9. Southeast Surface Parking
10. South Loop Road Surface Parking
11. Lot 132A Surface Parking
12. Lot 132B Surface Parking

Legend:
- Parking Structure
- Parking Lot (on FRC campus)
- Shared Use Path
- Bicycle Lane
- Sidewalk Network
- Site Boundary
Bus Rapid Transit

Figure 1-19: Site Context with Potential BRT Stations & Alignments
At present, the campus includes:

- 10,987 assigned personnel to the FDA Campus with a current peak daily population of 7,793;
- 3,766,605 gsf with 60,438 gsf of bridges and tunnels and 996,975 gsf parking garages for a total of 4,824,018 gsf;
- 6,817 parking spaces (including visitor parking); and
- Child Care Center located on the south side of the FDA Campus.
Master Plan Alternatives Summary

**NO BUILD ALTERNATIVE**
- Campus Remains As-Is, no new buildings

**ALTERNATIVE A**
- Mid Rise Buildings (5-9 Floors)
- Total New GSF: 1,589,161 ft² (Office & Special Use)
- 4 new parking structures (7,064 Spaces*)
- Most impervious surfaces added

**ALTERNATIVE B**
- (1) 20-story Tower + Midrise Buildings
- Total New GSF: 1,748,834 ft² (Office & Special Use)
- 3 new parking structures (7,073 Spaces*)
- Least impervious surfaces added (equal to C)

**ALTERNATIVE C**
- (2) 14-story towers + Midrise buildings
- Total New GSF: 1,573,124 ft² (Office & Special Use)
- 4 new parking structures (7,141 Spaces*)
- Least impervious surfaces added (equal to B)

**COMMONALITIES (ALTERNATIVES A - C)**
- Preservation of the historic New Hampshire Avenue green buffer
- Preservation of historic structures
- Compact walkable campus
- Iconic building anchoring commons
- High performance buildings
- New northern loop road
- Transit Center

*New parking includes replacement of existing parking displaced by new buildings
## Program Comparison

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>NEW OFFICE</strong></td>
<td><strong>NEW OFFICE</strong></td>
<td><strong>NEW OFFICE</strong></td>
</tr>
<tr>
<td>1.2M ft(^2)</td>
<td>1.2M ft(^2)</td>
<td>1.1M ft(^2)</td>
</tr>
<tr>
<td>109K m(^2)</td>
<td>110K m(^2)</td>
<td>106K m(^2)</td>
</tr>
<tr>
<td><strong>COMMUNICATION CENTER</strong></td>
<td><strong>COMMUNICATION CENTER</strong></td>
<td><strong>COMMUNICATION CENTER</strong></td>
</tr>
<tr>
<td>74K ft(^2)</td>
<td>91K ft(^2)</td>
<td>77K ft(^2)</td>
</tr>
<tr>
<td>6.9K m(^2)</td>
<td>8.5K m(^2)</td>
<td>8.5K m(^2)</td>
</tr>
<tr>
<td><strong>TRANSIT/VISITOR CENTER</strong></td>
<td><strong>TRANSIT/VISITOR CENTER</strong></td>
<td><strong>TRANSIT/VISITOR CENTER</strong></td>
</tr>
<tr>
<td>23K ft(^2)</td>
<td>23K ft(^2)</td>
<td>23K ft(^2)</td>
</tr>
<tr>
<td>2.2K m(^2)</td>
<td>2.2K m(^2)</td>
<td>2.2K m(^2)</td>
</tr>
<tr>
<td><strong>CENTRAL CONFERENCE</strong></td>
<td><strong>CENTRAL CONFERENCE</strong></td>
<td><strong>CENTRAL CONFERENCE</strong></td>
</tr>
<tr>
<td>64K ft(^2)</td>
<td>73K ft(^2)</td>
<td>73K ft(^2)</td>
</tr>
<tr>
<td>6K m(^2)</td>
<td>7K m(^2)</td>
<td>7K m(^2)</td>
</tr>
<tr>
<td><strong>DISTRIBUTION CENTER</strong></td>
<td><strong>DISTRIBUTION CENTER</strong></td>
<td><strong>DISTRIBUTION CENTER</strong></td>
</tr>
<tr>
<td>97K ft(^2)</td>
<td>103K ft(^2)</td>
<td>97K ft(^2)</td>
</tr>
<tr>
<td>9K m(^2)</td>
<td>9.6K m(^2)</td>
<td>9K m(^2)</td>
</tr>
<tr>
<td><strong>OTHER SPECIAL /SHARED SPACES</strong></td>
<td><strong>OTHER SPECIAL /SHARED SPACES</strong></td>
<td><strong>OTHER SPECIAL /SHARED SPACES</strong></td>
</tr>
<tr>
<td>160K ft(^2)</td>
<td>265K ft(^2)</td>
<td>165K ft(^2)</td>
</tr>
<tr>
<td>15K m(^2)</td>
<td>25K m(^2)</td>
<td>14K m(^2)</td>
</tr>
<tr>
<td><strong>SITE INFRASTRUCTURE</strong></td>
<td><strong>SITE INFRASTRUCTURE</strong></td>
<td><strong>SITE INFRASTRUCTURE</strong></td>
</tr>
<tr>
<td>7,064 spaces</td>
<td>7,073 spaces</td>
<td>7,141 spaces</td>
</tr>
</tbody>
</table>

*Total New GSF:*  
- Alternative A: 1,589,161 sf  
- Alternative B: 1,748,834 sf  
- Alternative C: 1,573,124 sf
Alternative A: Mid-Rise Office Buildings

Parking Structure
- 4 levels
- 2,057 spaces

Transit Visitor Center
- 1 level
- 2,160 m² / 23,250 ft²

Truck Screening
- 1 level
- 880 m² / 9,420 ft²

Conference Center
- 2 levels
- 6,000 m² / 64,583 ft²

Parking Structure
- 6 levels
- 580 spaces

Building A
- 10 levels
- 43 m² / 141 ft²
- 21,142 m² / 228,083 ft²
- Office
- 21,189 m² / 228,083 ft²
- Shared Use
- 5,853 m² / 64,077 ft²

Communications Center
- 1 level below Plaza
- 6,880 m² / 74,065 ft²

Parking Structure
- 6 levels
- 1,913 spaces

Building C
- 10 levels
- 45 m² / 137 ft²
- 19,321 m² / 207,973 ft²
- Office
- 17,389 m² / 187,176 ft²
- Shared Use
- 1,932 m² / 20,797 ft²

Parking Structure
- 7 levels
- 2,004 spaces

Building D
- 6 levels
- 34 m² / 112 ft²
- Office
- 47,246 m² / 509,577 ft²

Parking Structure
- 6 levels
- 2,004 spaces

Building B
- 10 levels
- 47 m² / 153 ft²
- 29,012 m² / 312,288 ft²
- Office
- 22,043 m² / 245,879 ft²
- Shared Use
- 6,969 m² / 75,409 ft²

Chemical Handling Distribution Center
- 1 level
- 10,000 m² / 108,868 ft²

Distribution Center
- 1 level below Plaza
- 9,000 m² / 96,875 ft²
ALTERNATIVE A
New Development Concept Diagram

1. Central Axis from Building 1
2. Cross Axis

LEGEND
- New Development
- Axial Relationship

Scale: 1:5,000
ALTERNATIVE A
Illustrative Plan - Overall Land Use

1. New Office Building
2. New Parking Garage
3. Distribution Center (Below Plaza)
4. New Conference Center
5. New Cafeteria
6. Potential Truck Screening Facility
7. Potential Bypass Road to FDA Blvd
8. Transit Hub and Bus Bays
9. Pedestrian Only Path
10. Pedestrian Bridge

SUSTAINABILITY FEATURES
1. Proposed Green Roof
2. Rooftop Solar Panels
3. Permeable Paving
4. Bio-Retention Area

Scale 1:5,000

Figure 3-6: Alternative A Illustrative plan
ALTERNATIVE A
Ground Level Plan (Below Plaza)

1. New Office Building
2. New Parking Garage
3. Distribution Center
4. New Conference Center
5. New Communication Center
6. Other Shared Use
7. Potential Bypass Road
to FDA Blvd
8. Transit Hub and Bus Bays
9. Pedestrian Only Path
10. Truck Screening Facility
11. Pedestrian Bridge

LEGEND
- Building Entrance/ Lobby
- Existing Tunnel System
- New Tunnel System

Figure 3-7: Alternative A Ground Level Plan (Below Plaza)
Alternative A Sections and Line of Sight

**SECTION A-A**

- **Office Building**
  - 10 levels
  - 42 m / 137 ft

- **Distribution Center**

- **Parking**

**SECTION B-B**

- **Office Building**
  - 8 levels
  - 34 m / 112 ft

- **Distribution Center**

- **Parking**

---

*Image of a diagram showing sections and line of sight for Alternative A, including office buildings, distribution centers, and parking areas.*
Figure 3-10: Alternative A View from New Hampshire
Alternative A View from Mahan Road Circle

Figure 3-11: Alternative A View from Mahan Road Circle
ALTERNATIVE A

View from Commons

Figure 3-12: Alternative A View from Commons
Alternative A New Hampshire and Michelson Road View
Alternative A New Hampshire and Mahan Road View
Critical to the needs of FDA is the construction of the distribution center and truck screening facility for security reasons. They would be both built in the first phase. Additionally, the first phase could include expansion of the NE parking garage.

Phase 2 would be construction of the parking garage and conference center in the NW quad. For the campus expansion, additional parking needs to be constructed because the future office buildings are located where surface parking currently exists.

These two initial phases set the stage for phase 3 and 4 to support those functions. Phase 3 and 4 would include the construction of office buildings and parking garages. In this diagram, construction of the buildings that extend the Commons to the east would be first, followed by expansion of the SE Quad.
ALTERNATIVE A
ENVIRONMENTAL CONSTRAINTS
& PERIMETER SECURITY

- 25' Standoff
- 75' Standoff
- Site Perimeter
- Vehicle Barrier
- Outer Perimeter Fence
- Permanent Gate
- Over-size Vehicle Barrier
- Pedestrian Entrance Security Point
- Service Access Point
- Inner Campus Perimeter
- New Building
- New Building Garage
- Existing Building
- Existing Building Garage
- Entrance Function
- Stream Valley Buffer
- Wetland
- 100 year Floodplain
- Tree Canopy
Alternative B: One Large Tower Office Building

- Building B
  - 20 levels + PH
  - 91 m / 298 ft
  - 49,040 m² / 527,862 ft²
  - Office: 44,738 m² / 475,076 sf
  - Shared Use: 4,304 m² / 46,788 sf

- Parking Structure
  - 7 levels
  - 2,306 spaces

- Building C
  - 8 levels
  - 24 m / 79 ft
  - 66,285 m² / 713,278 ft²
  - Office (7 Levels): 47,471 m² / 510,979 sf
  - Shared Use (Below Plaza Levels): 18,814 m² / 202,299 sf

- Parking Structure
  - 2 levels
  - 2,700 spaces

- Chemical Handling Distribution Center
  - 1 level
  - 500 m² / 5,458 sf

- Communications Center
  - 1 level below Plaza
  - 6,464 m² / 70,110 sf

- Distribution Center
  - 3 levels
  - 9,000 m² / 96,875 sf

- Building A - 8 levels
  - Office
  - 19,086 m² / 205,254 sf

- Transit/Visitor Center
  - 1 level
  - 2,160 m² / 23,250 sf

- Truck Screening
  - 1 level
  - 680 m² / 7,240 sf

- Conference Center
  - 2 levels
  - 7,000 m² / 75,347 sf
ALTERNATIVE B

New Development Concept Diagram

1. Central Axis from Building 1
2. Cross Axis

Figure 3-15: Alternative B Concept Diagram
**ALTERNATIVE B**

Illustrative Plan - Overall Land Use

1. New Office Building
2. New Parking Garage
3. Distribution Center
4. New Conference Center
5. New Cafeteria
6. Potential Truck Screening Facility
7. Potential Bypass Road to FDA Blvd
8. Transit Hub and Bus Bays
9. Pedestrian Only Path

**SUSTAINABILITY FEATURES**

1. Proposed Green Roof
2. Rooftop Solar Panels
3. Permeable Paving
4. Bio-Retention Area

**Figure 3-16: Alternative B Illustrative Plan**
ALTERNATIVE B

Ground Level Plan (Below Plaza)

1. New Office Building
2. New Parking Garage
3. Distribution Center
4. New Conference Center
5. New Communication Center
6. Other Shared Use
7. Potential Bypass Road to FDA Blvd
8. Transit Hub and Bus Bays
9. Pedestrian Only Path
10. Truck Screening Facility

LEGEND
- Building Entrance/ Lobby
- Existing Tunnel System
- New Tunnel System

Scale 1:5,000

Figure 3-17: Alternative B Ground Level Plan (Below Plaza)
Figure 3-18: Alternative B Circulation Diagram
Alternative B Sections and Line of Sight

Figure 3-19: Alternative B Sections and Line of Sight Diagram
## Alternative B View from South New Hampshire

<table>
<thead>
<tr>
<th>ALTERNATIVE B</th>
<th>View</th>
</tr>
</thead>
<tbody>
<tr>
<td>South New Hampshire Ave View</td>
<td>1</td>
</tr>
</tbody>
</table>

Figure 3-20: Alternative B View from South New Hampshire Ave.

- NEW OFFICE BUILDING
ALTERNATIVE B
NEW HAMPSHIRE AND MICHELSON RD VIEW
ALTERNATIVE B
NEW HAMPSHIRE AND MAHAN ROAD VIEW
Alternative B View from Mahan Road

Figure 3-21: Alternative B View from New Hampshire Ave.
ALTERNATIVE B
Mahan Road Circle View

Figure 3-22: Alternative B View from Mahan Road Circle
ALTERNATIVE B
View from Commons

Figure 3-23: Alternative B View from Commons
ALTERNATIVE B
Phasing and Implementation Plan

Critical to the needs of FDA is the construction of the distribution center and truck screening facility for security reasons. They would be both built in the first phase.

Phase 2 would be construction of the parking garage in the SE Quad. For the campus expansion, additional parking needs to be constructed because the future office buildings are located where surface parking currently exists.

These two initial phases set the stage for phase 3 and 4 to support those functions. Phase 3 and 4 would include the construction of office buildings, the conference center, and parking garages. In this diagram, construction of the buildings in the NW Quad would be first and the construction of the buildings that extend the Commons to the east is the last phase. They could be easily reversed based on the availability of funds.

LEGEND
- Phase 1 Building
- Phase 1 New Road and Improvement
- Phase 2 Building
- Phase 2 New Road and Improvement
- Phase 3 Building
- Phase 3 New Road and Improvement
- Phase 4 Building
- Phase 4 New Road and Improvement
ALTERNATIVE B
ENVIRONMENTAL CONSTRAINTS
& PERIMETER SECURITY
Alternative C: Mid-Rise Office Buildings

Parking Structure
- 4 levels
- 2,067 spaces

Transit/Visitor Center
- 1 level
- 2,100 m² / 22,520 ft²

Truck Screening
- 1 level
- 580 m² / 6,269 ft²

Conference Center
- 2 levels
- 7,000 m² / 75,347 ft²

Building A - 6 levels
- Office
- 19,086 m² / 205,254 ft²

Distribution Center
- 1 level below Plaza
- 9,000 m² / 96,867 sf²

Building B
- 14 levels + PH
- 67 m² / 218 ft²
- 31,470 m² / 339,740 sf²
- Office
- 29,220 m² / 310,230 sf²
- Shared Use
- 5,250 m² / 56,910 sf²

Building C
- 14 levels + PH
- 67 m² / 218 ft²
- 44,050 m² / 474,214 sf²
- Office
- 37,000 m² / 396,350 sf²
- Shared Use
- 7,048 m² / 75,864 sf²

Building D
- 7 levels
- 30 m² / 91 ft²
- 31,270 m² / 336,589 sf²
- Office (6 Levels)
- 24,102 m² / 259,436 sf²
- Communication Center
- (1 Level below Plaza)
- 4,168 m² / 44,786 sf²

Chemical Handling Distribution Center
- 1 level
**ALTERNATIVE C**

New Development Concept Diagram

1. Central Axis from Building 1
2. Cross Axis

**LEGEND**

- New Development
- Axial Relationship

Scale: 1:5,000

Figure 3-26: Alternative C Concept Diagram
Alternative C Illustrative Plan - Overall Land Use

1. New Office Building
2. New Parking Garage
3. Distribution Center
4. New Conference Center
5. New Cafeteria
6. Potential Truck Screening Facility
7. Potential Bypass Road to FDA Blvd
8. Transit Hub and Bus Bays
9. Pedestrian Only Path
10. Dining Pavilion

Sustainability Features
1. Proposed Green Roof
2. Rooftop Solar Panels
3. Permeable Paving
4. Bio-Retention Area

Figure 3-27: Alternative C Illustrative plan
Alternative C Circulation Diagram

LEGEND

<table>
<thead>
<tr>
<th>Vehicles</th>
<th>Unscreend</th>
<th>Screened</th>
<th>Stops</th>
<th>Garage Entrances</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trucks</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>FDA Shuttle</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bus</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Visitors</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>FDA Employees</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Figure 3-29: Alternative C Circulation Diagram
Figure 3-30: Alternative C Sections and Line of Sight Diagram
ALTERNATIVE C
South New Hampshire Ave View

Figure 3-31: Alternative C View from South New Hampshire Ave.
ALTERNATIVE C
NEW HAMPSHIRE AND MICHELSO ROAD VIEW
ALTERNATIVE C
NEW HAMPSHIRE AND MAHAN ROAD VIEW
Figure 3-32: Alternative C View from New Hampshire Ave.
Figure 3-33: Alternative C View from Mahan Road Circle
ALTERNATIVE C
View from Commons

Figure 3-34: Alternative C View from Commons
ALTERNATIVE C
Phasing and Implementation Plan

Like Alternative A & B, the construction of the distribution center and truck screening facility for security reasons is critical. They would be both built in the first phase.

Like Alternative B, phase 2 would be construction of the parking garage in the SE Quad. For the campus expansion, additional parking needs to be constructed because the future office buildings are located where surface parking currently exists.

These two initial phases set the stage for phase 3 and 4 to support those functions. Phase 3 and 4 would include the construction of office buildings, the conference center and parking garages. In this diagram, construction of the buildings in the NW Quad would be first and the construction of the buildings that extend the Commons to the east is the last phase. They could be easily reversed based on the availability of funds.

LEGEND

- Phase 1 Building
- Phase 1 New Road and Improvement
- Phase 2 Building
- Phase 2 New Road and Improvement
- Phase 3 Building
- Phase 3 New Road and Improvement
- Phase 4 Building
- Phase 4 New Road and Improvement
ALTERNATIVE C
ENVIRONMENTAL CONSTRAINTS & PERIMETER SECURITY

- 25' Standoff
- 75' Standoff
- Site Perimeter
- Vehicle Barrier
- Outer Perimeter Fence
- Permanent Gate
- Over-size Vehicle Barrier
- Pedestrian Entrance Security Point
- Service Access Point
- Inner Campus Perimeter
- New Building
- New Building Garage
- Existing Building
- Existing Building Garage
- Entrance Function
- Stream Valley Buffer
- Wetland
- 100 year Floodplain
- Tree Canopy
ALTERNATIVE A Streetscape and Landscape Concept Diagram

1. Building Axis / Concept Guideline
2. Existing Garden Art
3. Existing Commons

LEGEND
- Proposed Structures
- Multi-Use Trail and Bike Path
- Bike Path Under Land Bridge
- Plaza
- Pedestrian Walkway
- Planting
- Bio-Retention Area
- Art or Sculpture

Figure 3.36: Alternative A Streetscape and Landscape Concept Diagram
Alternative B Streetscape and Landscape Concept Diagram

1. Building Axis / Concept Guideline
2. Existing Garden Art
3. Existing Commons

LEGEND
- Proposed Structures
- Multi-Use Trail and Bike Path
- Bike Path Under Land Bridge
- Plaza
- Pedestrian Walkway
- Planting
- Bio-Retention Area
- Art or Sculpture

Scale 1:5,000

Figure 3-37: Alternative B Streetscape and Landscape Concept Diagram
Proposed Stormwater Management Plan
Good Morning Vivian,

On March 2, 2018 the U.S. General Services Administration (GSA) submitted the Draft Master Plan and Draft TMP for the U.S. Food and Drug Administration’s (FDA) Headquarter’s Consolidation at the Federal Research Center, White Oak Campus, Silver Spring, MD to the following agencies for review and comments as a part of the Mandatory Referral:

**Mandatory Referral Agencies -**

- Maryland Clearinghouse
- Maryland Department (s) of the:
  - Environment;
  - Transportation;
  - Natural Resources; and
- Maryland Office of Maryland Military Department
- Regional Agency(ies) of Maryland National Capital Park and Planning Commission (MNCPPC):
  - Montgomery County Departments, various;
  - Montgomery County, Planning Departments;
  - Prince George's County Departments, various; and
  - Prince George’s County, Planning Department

The agencies were asked to review, comment, and provide Referral Letters back to GSA by May 11, 2018. The exception being, MNCPPC; the Montgomery County and Prince George’s Counties were to make their staff reports available by May 11, 2018. And, the MNCPPC Referral letter would be provided to GSA May 21, 2018 (after the May 16, 2018 Commission meeting). The MNCPPC Referral letter date was agreed upon at the NCPC, MNCPPC, and GSA Coordination Meeting on April 11, 2018. All Referral Letters would be transmitted to NCPC no later than Wednesday, May 23, 2018.

The following agencies provided Referral Letters with comments to GSA on the Draft Master Plan and Draft TMP; and are attached:

- Maryland Clearinghouse;
- Maryland Historical Trust;
- Maryland Department of Transportation State Highway Administration;
- MNCPPC, includes -
  - Full Commission’s letter with comments;
  - Montgomery County Departments (various) and Planning Departments staff report;
Prince George's County Departments (various) and Planning Departments staff report; and

The following agency did not provide a Referral Letter with comments to GSA on the Draft Master Plan and Draft TMP; however, they provided a letter on the DEIS regarding the project:

- Maryland Department of Natural Resources

No Referral Letters were received from the following agencies:

- Maryland Department of the Environment; and
- Maryland Office of Maryland Military Department

In accordance with your intergovernmental referral policy included in NCPC's Submission Guidelines, please find the attached Referral Letters. If you have any additional questions, please let Shelly W. Jones know at shelly.jones@gsa.gov or 202-401-9657.

Sincerely,
Shelly

Attachments: Referral Letters/Comments

--
Shelly W. Jones, AIA. COR. LEED Green Associate.
Community Planner
Office of Planning and Design Quality
Public Buildings Service
National Capital Region
U.S. General Services Administration
301 7th Street, SW
Suite 4004
Washington, DC 20407

Office: 202-401-9657
Cell: 202-710-5335
April 19, 2018

Mr. Paul Gyamfi
NEPA Compliance Specialist, Office of Planning and Design Quality
U.S. General Services Administration
301 7th Street, SW, Room 4004
Washington, DC  20407

STATE CLEARINGHOUSE RECOMMENDATION
State Application Identifier:  MD20180313-0169
Applicant:  U.S. General Services Administration
Project Description:  Draft Master Plan and Draft Transportation Management Plan (TMP) for the U.S. Food and Drug Administration's (FDA) Headquarters Consolidation at the Federal Research Center, White Oak Campus, Silver Spring, MD
Project Location:  County(ies) of Montgomery
Approving Authority:  U.S. General Services Administration GSA
Recommendation:  Consistent with Qualifying Comments and Contingent Upon Certain Actions

Dear Mr. Gyamfi:

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. This recommendation is valid for a period of three years from the date of this letter.

Review comments were requested from the Maryland Department(s) of General Services, Natural Resources, Transportation, the Environment; Montgomery County; the Maryland National Capital Parks and Planning Commission - Montgomery County; and the Maryland Department of Planning, including the Maryland Historical Trust. As of this date, the Maryland Department(s) of Natural Resources, Transportation; Montgomery County; and the Maryland National Capital Parks and Planning Commission - Montgomery County have not submitted comments.

The Maryland Department of General Services and the Maryland Department of Planning found this project to be consistent with their plans, programs, and objectives.

Our Department (Planning) noted that the Federal Research Center Master Plan involves the Federal Research Center, located in White Oak, Maryland. The draft Environmental Impact Statement explores a no-build and several build scenarios on existing Federally owned land to accommodate future relocations of additional Federal Government agencies. Any anticipated growth on the campus is located within Federal Land and is not subject to the Priority Funding Areas Act.
Planning is encouraged to see the General Services Administration (GSA) and the U.S. Food and Drug Administration (FDA) work with Montgomery, Prince George's County and the Maryland State Highway Administration to consider intelligent transportation technologies, transportation demand management strategies and targeted roadway and non-vehicular capacity solutions to meet the needs of an expanded Federal campus. The strategies identified in the plan are consistent with the local land use policies and related-comprehensive plans.

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

1. Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. 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 Land Management Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.

2. If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information.

3. 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) 537-3315 for additional information regarding solid waste activities and contact the Waste Diversion and Utilization Program at (410) 537-3314 for additional information regarding recycling activities.

4. The Waste Diversion and Utilization Program should be contacted directly at (410) 537-3314 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. The Program should also be contacted 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.

5. 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.

6. The proposed project may involve 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 the Land Restoration Program at (410) 537-3437.
The Maryland Historical Trust (Trust), in the attached April 6, 2018 letter, stated that their finding of consistency is contingent upon the applicant taking the action(s) summarized below.

The Trust stated that the Federal research center, White Oak campus was determined eligible for the listing in the National Register of Historic Places (national Register) as the Naval Ordnance Laboratory (NSWC White Oak) (Maryland Inventory of Historic Property No. M:33-25) under Criteria A,B, and C. The draft Master Plan and Environmental Impact Statement (EIS) are well written with multiple design options for the General Services Administration (GSA) and Federal Drug Administration to pursue in the future. The plan does not identify a preferred alternative. As discussed in the document, the design options under Alternatives B and C, both of which included the taller office buildings, would have adverse effects on the historic resources. The Trust concurs with this assessment.

The Trust looks forward to continued consultation with GSA and other consulting parties pursuant to 36 C.F.R. §800 to complete the Section 106 process. Resolution of adverse effects may include a signed Memorandum of Agreement Alternative. GSA and FDA should coordinate with the Trust and the Advisory Council on Historic Preservation to determine the appropriate agreement document for this undertaking. For questions, or further assistance please contact Natalie Loukianoff (for structures and landscape) at natalie.loukianoff@maryland.gov, or Beth Cole (for archeology) at beth.cole@maryland.gov or 410-697-9541.

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 myra.barnes@maryland.gov. 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,

Myra Barnes, Lead Clearinghouse Coordinator

MB:MB
Enclosure(s)
cc: Shelly W. Jones - GSA
Tina Quinichette - MDOT
Amanda Degen - MDE
Greg Golden - DNR
Wendy Scott-Napier - DGS
Greg Ossont - MTGM
Cathy Conlon - MNCPPCM
Bihui Xu - MDPI-T
Joseph Griffiths - MDPL
Beth Cole - MHT
April 6, 2018

Stephanie Hamlett
Chief, Planning Branch
Office of Planning and Design Quality
GSA Nation Capital Region
301 7th Street SW
Washington, DC 20407-0001

Re: MHT Review of Draft Master Plan and Draft Environmental Impact Statement for U.S. Food and Drug Administration’s Headquarters Consolidation at the Federal Research Center, White Oak Campus
Montgomery County, Maryland
MD20180313-0169
MD20180306-0135

Dear Ms. Hamlett:

Thank you for providing the Maryland Historical Trust (Trust), Maryland’s State Historic Preservation Office, with copies of the draft Master Plan and Environmental Impact Statement (EIS) for the U.S. Food and Drug Administration’s (FDA) Headquarters Consolidation at the Federal Research Center, White Oak Campus in Silver Spring, Montgomery County. The Trust is reviewing the undertaking with respect to potential effects on historic properties, pursuant to Section 106 of the National Historic Preservation Act and we are writing to provide our comments.

The Federal Research Center, White Oak Campus was determined eligible for listing in the National Register of Historic Places (National Register) as the Naval Ordnance Laboratory (NSWC White Oak) (Maryland Inventory of Historic Property No. M: 33-25) under Criteria A, B, and C. The draft Master Plan and EIS are well written with multiple design options for the General Service Administration (GSA) and FDA to pursue in the future. The plan does not identify a preferred alternative. As discussed in the document, the design options under Alternatives B and C, both of which included the taller office buildings, would have adverse effects on the historic resources. The Trust concurs with this assessment.

We look forward to continued consultation with GSA and other consulting parties pursuant to 36 C.F.R. § 800 to complete the Section 106 process. Resolution of adverse effects may include a signed Memorandum of Agreement or Program Alternative. GSA and FDA should coordinate with the Trust and the Advisory Council on Historic Preservation to determine the appropriate agreement document for this undertaking.

We appreciate GSA and FDA’s proactive efforts to take historic properties into account during your planning process. If you have any questions or we may be of assistance, please contact Natalie Loukianoff
(regarding structures and landscape) at natalie.loukianoff@maryland.gov or 410-697-9587 or Beth Cole (regarding archaeology) at beth.cole@maryland.gov or 410-697-9541. Thank you for providing us this opportunity to comment.

Sincerely,

[Signature]

Elizabeth Hughes
Director / State Historic Preservation Officer
Maryland Historical Trust

EH/NSL/EJC/201801103
CC: Nancy Witherell (GSA)
    Gary Porter (GSA)
    Paul Gyamfi (GSA)
    Kirsten Kulius (ACHP)
    Myra Barnes (Clearinghouse)
    Vivian Lee (NCPC)
    Rebecca Ballo (Montgomery County)
    Ruth Mills (Quinn Evens)
PROJECT STATUS FORM

Please complete this form and return it to the State Clearinghouse upon receipt of notification that the project has been approved or not approved by the approving authority.

TO: Maryland State Clearinghouse
    Maryland Department of Planning
    301 West Preston Street
    Room 1104
    Baltimore, MD 21201-2305

DATE: (Please fill in the date form completed)

FROM: (Name of person completing this form.)

PHONE: (Area Code & Phone number)

RE: State Application Identifier: MD20180313-0169
    Project Description: Draft Master Plan and Draft Transportation Management Plan (TMP) for the U.S. Food and Drug Administration’s (FDA) Headquarters Consolidation at the Federal Research Center, White Oak Campus, Silver Spring, MD

PROJECT APPROVAL

This project/plan was: □ Approved □ Approved with Modification □ Disapproved

Name of Approving Authority: ____________________________ Date Approved: ____________________________

FUNDING APPROVAL

The funding (if applicable) has been approved for the period of: ____________________________, 201__ to ____________________________, 201__ as follows:

Federal $: ____________________________ Local $: ____________________________ State $: ____________________________ Other $: ____________________________

OTHER

□ Further comment or explanation is attached

Maryland Department of Planning • 301 West Preston Street, Suite 1101 • Baltimore • Maryland • 21201
Tel: 410.767.4500 • Toll Free: 1.877.767.6272 • TTY users: Maryland Relay • Planning.Maryland.gov
May 8, 2018

Ms. Stephanie Hamlett, AICP
Chief, Planning Branch
GSA National Capital Region
Office of Planning and Design Quality
United States General Services Administration
301 7th Street, SW
Washington DC 20407

Attention: Ms. Shelly Jones

Dear Ms. Hamlett:

Thank you for providing the Maryland Department of Transportation State Highway Administration (MDOT SHA) the opportunity to comment on the 2018 Federal Research Center Master Plan draft. The MDOT SHA looks forward to continuing to work with the United States General Services Administration (GSA), the United States Food and Drug Administration (FDA), Montgomery and Prince George’s counties, and the Maryland-National Capital Park and Planning Commission to develop and implement transportation infrastructure to support the Federal Research Center at White Oak. The MDOT SHA submits the following comments.

General Comments

- The MDOT SHA is one of six transportation business units that comprise, along with MDOT The Secretary’s Office, MDOT. The Maryland Department of Transportation should be abbreviated as “MDOT” in all subsequent mentions. Any mention of the “State Highway Administration,” “Maryland State Highway Administration,” “SHA,” “MSHA,” “MDSHA” or the like should be replaced with “the Maryland Department of Transportation State Highway Administration (MDOT SHA)” on first mention and “MDOT SHA,” subsequently. Similarly, any mention of “MTA” or the like should be replaced with “the Maryland Department of Transportation Maryland Transit Administration (MDOT MTA)” on first mention and “MDOT MTA,” subsequently.

- Any road included in the National Highway System (NHS), of which MDOT SHA owned and maintained I-95, I-495 (Capital Beltway), US 29 (Columbia Pike), and MD 650 (New Hampshire Avenue) in and near White Oak are component facilities, must remain compliant with the transportation performance measure processes, goals, and targets called for in MAP-21 and the FAST Act. Many of these goals are related to traffic operations, capacity, and
throughput. While MDOT SHA encourages GSA to study ways to emphasize non-auto modes, improvements at the “expense” of vehicular mobility may lead to a situation where NHS compliance is called into question by the Federal Highway Administration (FHWA).

- This master plan does not appear to note MDOT SHA’s planning I-495 and I-270 Public-Private Partnership (P3) Project announced by Governor Larry Hogan in September 2017. This $7.6 billion investment will implement express toll lanes on I-270 and I-495 in Maryland. Planning funding for these improvements is included in MDOT’s FY 2018-2023 Consolidated Transportation Program (CTP). These improvements are included in the National Capital Region Transportation Planning Board’s (TPB) draft long-range transportation plan (LRTP), Visualize 2045 and accompanying regional transportation modeling efforts. As the master plan analyzes a 2040 scenario, these improvements should be assumed in any modeling that informs the master plan. The MDOT SHA anticipates completing planning and selecting a concessionaire in 2020. The MDOT SHA requests that this master plan considers mentioning this project as well as the transportation benefits that will result from implementation of this project.

- In general, intersection design is beyond the scope of a master plan. Nonetheless, future modifications to intersections should not result in failing levels of service on MDOT SHA roadways and will need to be supported by appropriate traffic operations studies at the time improvements advance.

- In the development of this master plan, did GSA consider implementing campus build-out thresholds whereby specific campus employment populations are accommodated only after previous thresholds’ commute/parking needs are accommodated? Such a consideration may prevent undue stress on the local roadway network and on-campus parking facilities should anticipated non-auto mode shares not be reached.

- The effectiveness of transportation demand management strategies and policy initiatives referenced in this master plan should be evaluated comprehensively during the five-year planning phase.

2018 FRC Master Plan

- p. 33, section 1.8, figure 1-17 – It is unclear on which data the roadway designations in this figure are based. The FHWA designates US 29, south of MD 650, as an “other principal arterial;” figure 1-17 shows it as a “highway.” The FHWA designates MD 650 as an “other principal arterial;” figure 1-17 shows MD 650 as a “highway.” The FHWA designates Lockwood Drive, east of MD 650, and Stewart Lane as “major collectors;” figure 1-17 shows these as arterial roadways. The FHWA designates Schindler Drive, Cresthaven Drive, and April Lane as “local” roads; figure 1-17 shows these as “collectors.” Clarify this discrepancy and indicate source of data near figure 1-17.
• p. 104, section 3.8.6 – Clarify if the location of a potential truck screening location adjacent to Michelson Road allows for adequate truck queuing to prevent Michelson Road traffic from backing up through the MD 650 intersection.

2018 FRC Master Plan DEIS

• p. 43 – Under “Traffic and Transportation,” it is reported that the No-Action Alternative would have negative impacts due to traffic from current development. As the current development is there already, MDOT SHA is not sure why there would be a further negative impact from such development.

• p. 48 – The proposed transportation mitigation measures mention US 29 ITS improvements. It should be noted in this text that such measures will need to be coordinated with MDOT SHA and the Montgomery County Department of Transportation (MCDOT) as is noted for other mitigation measures on the list.

• p. 65 – The report notes in subsection 3.1.7 that few home relocations are expected with the addition of almost 7,000 employees to the site. It is not noted where these people currently work to support this expectation.

• p. 165 – In the first paragraph, it appears that the descriptions of the eastern and western study area limits are switched.

• p. 173 – The description of Michelson Road intersection mitigation describes Mahan Road left-turns.

• p. 174 – The description for US 29 mitigation at Industrial Parkway mentions changes to Old Columbia Pike in the fourth item instead of to Columbia Pike.

DEIS Appendix G – Transportation Technical Report – Project Summary

• p. ii, Conclusions and Mitigation, Transportation Demand Management – The MDOT SHA encourages GSA to work with MDOT SHA, MCDOT, and the Prince George’s County Department of Public Works and Transportation (PGDPW&T) to identify ways to optimize the current network of MDOT SHA and MCDOT park-and-ride facilities, especially by linking potential employee shuttle operations to nearby park-and-ride facilities, and to identify potential sites for expansion of the parking facility network.

• pp. iii-v, Conclusions and Mitigation, Additional Roadway Capacity – The MDOT SHA notes that while funding for design, right-of-way acquisition, and construction remains to be identified (MDOT SHA completed a US 29 corridor FEIS in 1995), US 29 interchanges at Stewart Lane, Tech Road/Industrial Parkway, Musgrove Road/Fairland Road, Greencastle
Road, and Blackburn Road remain in MDOT's CTP, the State's Highway Needs Inventory, TPB's regional transportation model, and Montgomery County's White Oak Local Area Transportation Improvement Program. Therefore, MDOT SHA recommends these interchanges be included in any modelling that informs this DEIS. The MDOT SHA notes that p. 61 of Appendix G states, "the Action with Mitigation [alternative] evaluates the short-term enhancements only" and not the interchanges. The MDOT SHA anticipates these five interchanges, collectively, will cost approximately $400 million-$600 million. Local transportation priorities are a key driver of MDOT's project funding decisions. In its 2017 transportation priorities letter, Montgomery County noted that "interchanges have been identified as a solution at [some US 29 locations], including Fairland/Musgrove Road and Tech Road/Industrial Parkway, but funding for design and construction has not been identified in the current CTP." The MDOT SHA requests that GSA consider the benefit of a US 29 interchange at Industrial Parkway (and Tech Road) and consider options to partner with MDOT and Montgomery County to identify funding opportunities for this project.

- p. vi, Conclusions and Mitigation, Transit, Pedestrian, and Bicycle Facilities – The MDOT SHA encourages GSA to work with MDOT SHA, MCDOT, and PGDPW&T to identify ways to best accommodate bicyclists and pedestrians in areas adjacent to the FRC. The MDOT SHA maintains various funding mechanisms by which the State, solely, or in partnership with local jurisdictions, implement new or upgrade existing bicycle and pedestrian infrastructure.

DEIS Appendix G – Transportation Technical Report – Section 3 Transportation System

- p. 32, Existing Roadway Network, Vehicle Study Area – In the first paragraph, it appears that the descriptions of the eastern and western study area limits are switched.

- pp. 32-36, Existing Roadway Network – Operations analyses should discuss how the Synchro models used were validated to current conditions.

- p. 36, table 5 (and other tables showing intersection LOS) – The average delays and 95th percentile queues should be reported to better differentiate between operations in separate scenarios when the LOS is the same letter grade.

- p. 44, table 12 – The intersection LOS improves for the US 29 intersection at Cherry Hill Road/Randolph Road when going from Existing Condition to the No Action Alternative. Please explain why the LOS improves and remains acceptable in the Build Alternative.

- p. 50 - The proposed transportation mitigation measures mention US 29 ITS improvements. It should be noted in this text that such measures will need to be coordinated with MDOT SHA and MCDOT as is noted for other mitigation measures on the list.
• pp. 50-58, Additional Capacity - See previous comment regarding US 29 interchange project development status, pp. 2-3. In addition, it remains unclear the extent to which short-term improvements, such as signal timing and additional lanes, would mitigate traffic compared to long-term interchange options.

• p. 51, New Hampshire Avenue (MD 650) and Powder Mill Road – While significant right-of-way may be needed for full mitigation, the mitigation nonetheless should be described and discussed. Also, based on the results of the Synchro analysis in Exhibit 3, the proposed optimization of signal phase lengths does not appear significantly to improve operations.

• p. 53, New Hampshire Avenue (MD 650) and Northwest Drive/Michelson Road – The description of Michelson Road intersection mitigation describes Mahan Road left turns.

• p. 53, New Hampshire Avenue (MD 650) and Northwest Drive/Michelson Road – The MDOT SHA currently is reviewing local resident concerns regarding cut-through traffic from the FRC via Northwest Drive. Anticipated MD 650 traffic conditions may exacerbate future diversion to the local/residential road network without proper mitigation, such as signage and traffic restrictions.

• p. 53, New Hampshire Avenue (MD 650) and Lockwood Drive – The suggestion to restrict eastbound Lockwood Drive left-turn movements to northbound MD 650 seems to require difficult wayfinding for US 29 motorists.

• p. 59, Transit, Pedestrian, and Bicycle Facilities – See previous comment regarding bicycle and pedestrian infrastructure development, p. 4.

• p. 60, table 18 – The proposed mitigation is shown to keep US 29 intersection operations at Lockwood Drive at LOS E. Yet, in Exhibit 4, the evening peak-period LOS degrades from LOS E to LOS F with the addition of mitigation. Please check and revise mitigation if it will, in fact, make the intersection operate at a lesser LOS.

• General – It is unclear why these analyses did not include an analysis of the US 29 interchange at MD 650, especially the effect of increased traffic on merges and weaves.

DEIS Appendix G – Transportation Technical Report – Section 4 Conclusions

• pp. 61-65, Additional Roadway Capacity - See previous comment regarding US 29 interchange project development status, pp. 3-4.

• p. 65 - Transit, Pedestrian, and Bicycle Facilities – See previous comment regarding bicycle and pedestrian infrastructure development, p. 4.
Ms. Stephanie Hamlett, AICP  
Page Six

DEIS Appendix G – Exhibits 1-2

- It appears that northbound US 29 morning peak-period turning volumes at Tech Road were repeated from the interchange at Randolph Road and are lower than MDOT SHA’s actual counts.

- Northbound US 29 through movements in the evening peak period appear to be much higher than MDOT SHA’s actual counts between MD 650 and Musgrove Road.

- The MD 650 intersection at Powder Mill Road has a relatively significant U-turn movement volume that is not shown in these counts.

DEIS Appendix H – Draft Transportation Management Plan – Executive Summary

- p. ii, Goals – The MDOT SHA supports goals and strategies that seek to lessen single-occupant vehicles (SOV) on the roadway network and commends GSA for seeking to cut SOV mode share to 54 percent. Nonetheless, this plan does not appear to address what happens on an atypical day. Is a parking “cushion” included in this analysis for those days when the SOV target is not reached?

- p. iii, Strategies, Transit, and Shuttles – This plan, in this and other sections, speaks about increasing the use of commuter bus as a commute mode. While this plan notes that the MDOT MTA Commuter Bus 204 currently stops at the FRC, the plan does not appear to note that MDTA MTA Commuter Bus routes 305 (Columbia-Washington via US 29), 315 (Columbia-Washington via US 29), and 325 (Columbia-Washington via US 29) all pass near to the FRC and that it may be a viable option to work with MDOT MTA to amend these routes also to stop at the FRC.

- p. iv, Strategies, Bike/Walk to Work – This plan should note (and does in other locations) that many roadways in the area are owned and maintained by MDOT SHA. Bicycle and pedestrian facility upgrades along such roads (I-95, I-495 (Capital Beltway), US 29 (Columbia Pike), and MD 650 (New Hampshire Avenue)) should be coordinated with both MDOT SHA and the applicable local jurisdiction.

DEIS Appendix H – Draft Transportation Management Plan – Section 1 Introduction

- p. 4, section 1.1.1.3 Transportation Planning Board (TPB) – Currently, Metropolitan Washington Council of Governments staff is drafting and conducting modeling activities for Visualize 2045, which TPB anticipates adopting in the Fall of 2018. This new LRTP will include TPB’s policy framework to guide future regional transportation investments and a fiscally-constrained list of projects planned for implementation between 2018 and 2045.
• US 29 interchanges at Stewart Lane, Tech Road/Industrial Parkway, Musgrove Road/ 
  Fairland Road, Greencastle Road, and Blackburn Road are included in this draft document. 
  This new LRTP will replace the existing Constrained Long-Range Plan (adopted 2016). 
  This DEIS should reflect TPB's regional transportation model.

• p. 5, section 1.1.3 Local — Currently, Montgomery County Planning Department staff is 
  drafting a comprehensive update to the Master Plan of Highways and Transitways, the first 
  comprehensive update to the plan since 1955. This plan is to be adopted in late 2018 or early 
  2019.

**DEIS Appendix H — Draft Transportation Management Plan — Section 2 Transportation System**

• p. 8, section 2.1 Local Roadway Network — This plan should note that I-95, I-495, US 29, 
  and MD 650 are components of the NHS. In addition, this plan should note that these 
  roadways are owned and maintained by MDOT SHA. Cherry Hill Road is owned and 
  maintained by Montgomery and Prince George's counties in their respective jurisdictions.

• p. 8, section 2.1 Local Roadway Network — This plan states that the posted speed limit on 
  I-95 is 55 mph. North of I-495, the posted speed limit along I-95 is 65 mph.

• p. 11, section 2.3 2.1 Bus Rapid Transit (BRT) — The MDOT SHA recommends this plan 
  clarify the extent of US 29 BRT improvements. The popular conception of BRT is a bus 
  running in a fixed, dedicated lane or lanes. Montgomery County’s planned US 29 BRT does 
  not include all elements of full BRT.

• p. 18, section 2.5 1 White Oak Master Plan — This plan states that improvements identified in 
  the White Oak Master Plan are assumed already to be constructed in the No Action 
  condition. Is there any assurance that these will be completed prior to FRC build-out?

**DEIS Appendix H — Draft Transportation Management Plan — Section 4 Traffic Impact Analysis**

• p. 45, section 4.0 Traffic Impact Analysis — In paragraph one, clarify that the “FDA Master 
  Plan Traffic Technical Report (TTR)” and Appendix G are one in the same, or that one is an 
  update to the other.

• p. 45, section 4.0 Traffic Impact Analysis, Transportation Demand Management — See 
  previous comment regarding park-and-ride network development, p. 3.

• p. 46, section 4.0 Traffic Impact Analysis, Additional Capacity — See previous comment 
  regarding US 29 interchange project development status, pp. 3-4.
Thank you again for the opportunity to comment on the 2018 Federal Research Center Master Plan draft. If you have questions, please contact Mr. Matt Baker, MDOT SHA Regional Planner, at 410-545-5668, toll free 1-888-204-4828, or via email at mbaker4@sha.state.md.us.

Sincerely,

[Signature]

Samantha Biddle, AICP
Chief
Regional and Intermodal Planning Division

cc: Ms. Mary Gibert, Public Buildings Service Regional Commissioner, National Capital Region, GSA
Mr. Paul Gyamfi, NEPA Compliance Specialist, National Capital Region, GSA
Mr. Matt Baker, Regional Planner, MDOT SHA
April 4, 2018

Mr. Paul Gyamfi
U.S. General Services Administration
301 7th Street, SW
Room 4004
Washington, DC 20407

RE: Environmental Review for Proposed Master Plan for Food and Drug Administration Headquarters Consolidation at Federal Research Center at White Oak, Montgomery County, Maryland.

Dear Mr. Gyamfi:

The Wildlife and Heritage Service has determined that there are no official State or Federal records for listed plant or animal species within the delineated area shown on the map provided. As a result, we have no specific concerns regarding potential impacts or recommendations for protection measures at this time. Please let us know however if the limits of proposed disturbance or overall site boundaries change and we will provide you with an updated evaluation.

Thank you for allowing us the opportunity to review this project. If you should have any further questions regarding this information, please contact me at (410) 260-8573.

Sincerely,

Lori A. Byrne,
Environmental Review Coordinator
Wildlife and Heritage Service
MD Dept. of Natural Resources

ER# 2018.0329.mo
May 22, 2018

Shelley W. Jones, AIA
Office of Planning and Design Quality
Public Buildings Service
National Capital Region
U.S. General Services Administration
301 7th Street, SW, Suite 4004
Washington, D.C. 20407

Re: FDA Campus Mandatory Referral (MR2018023)

Dear Commissioners of The National Capital Planning Commission:

The U.S. General Services Administration (GSA), in cooperation with the Food and Drug Administration (FDA), filed a Mandatory Referral with the Montgomery and Prince George’s Counties Planning Departments for the 2018 FDA Federal Research Center Master Plan and the 2018 Federal Research Center Master Plan, Draft Environmental Impact Statement. The FDA plans to expand their headquarters campus in White Oak and increase the total number of employees to 18,000 between 2025 and 2035. The 130-acre FDA campus is located within the 662-acre Federal Research Center (FRC), of which 622 acres are located in Montgomery County and 40 acres in Prince George’s County.

At its May 16, 2018 meeting, The Maryland-National Capital Park and Planning Commission (M-NCPPC) reviewed the Mandatory Referral, including a presentation from the GSA, which highlighted the details of the proposed Master Plan. The full Commission reviewed and discussed some of the major points identified in the attached Staff Reports.

In order to help relieve congestion in the White Oak area, the Commission requests that the number of parking spaces per employee be set at ratios that seek to reduce single-occupancy vehicle trips. The M-NCPPC acknowledges The National Capital Planning Commission’s (NCPC) role in determining the final ratio for the FDA campus. The M-NCPPC looks forward to working with GSA on the implementation of Bus Rapid Transit on New Hampshire Avenue and US 29. The Commission also requests that GSA work with the Maryland Department of Transportation to provide opportunities for commuter bus routes to the FDA campus. In addition, the FDA should explore options to provide connections through the FRC site. Contrary to the Staff’s recommendation, the Commission also found that access to and both active and passive use of
the green buffer space along New Hampshire Avenue (the former golf course) should be
maximized to the extent practicable, and would encourage coordination of such full-bodied
recreational efforts with M-NCPPC's Montgomery County Department of Parks.

On a motion by Vice Chair Elizabeth Hewlett, seconded by Commissioner Natali Fani-Gonzalez,
the Commission voted 7 to 0 to transmit the enclosed comments, with this transmittal letter, to
the NCPC. The Commission appreciates the opportunity to review this Mandatory Referral and
looks forward to continuing to work with the GSA and FDA on this project.

Sincerely,

[Signature]

Casey Anderson
Chair

[Signature]

Elizabeth M. Hewlett
Vice Chair

Enclosures
MEMORANDUM

TO: The Maryland-National Capital Park and Planning Commission
FROM: Casey Anderson, Chair, Montgomery County Planning Board
RE: FDA Campus Mandatory Referral (MR2018023)

On March 14, 2018, the U.S. General Services Administration (GSA), in cooperation with the Food and Drug Administration (FDA), filed a Mandatory Referral with the Montgomery County Planning Department for the 2018 FDA Federal Research Center Master Plan and the 2018 Federal Research Center Master Plan, Draft Environmental Impact Statement. The FDA plans to expand their headquarters campus in White Oak and increase the total number of employees to 18,000, in the time frame between 2025 to 2035. The 130-acre FDA campus is located within the 662-acre Federal Research Center (FRC), of which 622 acres are in Montgomery County and 40 acres are in Prince George's County. The FDA and 622 acres of the FRC are within Montgomery County's 2014 White Oak Science Gateway Master Plan.

At its regular meeting on May 3, 2018, the Montgomery County Planning Board reviewed the Mandatory Referral, including a presentation from staff, which highlighted the issues covered in the staff report (see enclosure). The Planning Board generally agreed with the points covered in the staff report, with a few modifications and comments that are reflected in this letter.

During the meeting, the Board asked for clarification regarding the significance of the "historic golf course buffer," the linear green area in front of FDA along New Hampshire Avenue. Based on the explanation we received from our historic preservation staff, the Planning Board understands there is a review process (Section 106) for any possible use of this green buffer, but the Board does not want to limit potential options for recreational opportunities within the buffer. The Board is also aware that a stream runs through the green buffer area. The Board members agreed to modify the following paragraph (from page 9 of the enclosed staff report) to reflect their position regarding the buffer.

Historic Golf Course Buffer
There has been some discussion of, and desire for, creating an amenity space in the green buffer area along New Hampshire Avenue, which is the former...
golf course associated with the Naval Ordnance Laboratory. A thoughtfully-designed, low-impact, publicly-accessible feature could be considered, such as a walking trail and benches, which preserves the historic setting and character of the original golf course, but also allows access and enjoyment of the amenity. The design of this amenity and desire for amenity space should be coordinated with the Montgomery County Department of Parks (part of the M-NCPPC). Any such alteration would require consultation and approval through the Section 106 process, and further review under the National Environmental Policy Act (NEPA).

The Board would also like to emphasize that, if the Memorandum of Agreement for the site (among the FDA, GSA, the Advisory Council for Historic Preservation, and the Maryland Historical Trust) is revised, we do not want to constrain the Parks Department from asking for something more ambitious in the buffer area, or adjacent to Hillendale Local Park, that would allow for increased recreational opportunities (as noted on page 11 of the staff report). The Planning Board supports maximizing access of this space if, at some future point, GSA/FDA will accommodate recreational use of this area.

The Planning Board also discussed the issue of connectivity in the White Oak area, which is constrained by the Paint Branch and the lack of public access through the FRC. The Planning Board is interested in GSA/FDA exploring options for additional connections that would disperse traffic, reduce pressure on the road network, and provide additional options for access to and from the site. In their letter to GSA dated April 16, 2018, the Montgomery County Department of Transportation (MCDOT) also requested that additional connectivity options be explored. The Board and MCDOT also agree that federal participation, particularly funding for Bus Rapid Transit on New Hampshire Avenue, is essential to ensure that FDA’s growth does not outpace and overwhelm the area’s transportation network.

After a thorough discussion, on a motion by Commissioner Gerald R. Cichy, the Planning Board voted 5 to 0 to transmit the enclosed staff report, with this transmittal letter, which reflects the Board’s specific comments on this Mandatory Referral. The Planning Board looks forward to discussing these issues at the full Commission meeting on May 16, 2018. The Board also looks forward to reviewing the Final Environmental Impact Statement and FDA Campus Master Plan later this year.
FDA Campus Mandatory Referral (MR20180023)

Troy Leftwich, Senior Planner, Area 2 Division, troy.leftwich@montgomeryplanning.org, 301-495-4553
Nancy Sturgeon, Supervisor, Area 2 Division, nancy.sturgeon@montgomeryplanning.org, 301-495-1308
Patrick Butler, Supervisor, Area 2 Division, patrick.butler@montgomeryplanning.org, 301-495-4561
Carrie Sanders, Chief, Area 2 Division, carrie.sanders@montgomeryplanning.org, 301-495-4653

Description

The U.S. General Services Administration (GSA), in cooperation with the Food and Drug Administration (FDA), filed a Mandatory Referral on March 14, 2018 for the 2018 FDA Federal Research Center Master Plan and the 2018 Federal Research Center Master Plan, Draft Environmental Impact Statement. FDA plans to expand their campus in White Oak and increase the total number of employees to 18,000, from 2025 to 2035. The 130-acre FDA campus is located within the 662-acre Federal Research Center, of which 522 acres are in Montgomery County and 40 acres are in Prince George’s County. This staff report provides comments regarding potential mitigation for the impacts resulting from the addition of 9,000 employees to the facility. The project is within the 2014 White Oak Science Gateway Master Plan.

Summary

- FDA is planning to accommodate up to 18,000 employees on the FDA campus, from 2025 to 2035.
- The Montgomery County Planning Board was briefed on the FDA Master Plan on February 22, 2018.
- The Planning Department provided written comments on the draft Environmental Impact Statement (EIS) to GSA on April 13, 2018, per GSA’s deadline (see Attachment 2).
- The Montgomery County Planning Board will provide comments on this Mandatory Referral to the full Maryland-National Capital Park and Planning Commission (M-NCPCC) prior to the full Commission meeting on May 16, 2018.
- The Prince George’s County Planning Board will review this Mandatory Referral on April 26, 2018.
- The full Commission of the M-NCPCC will review this Mandatory Referral on May 16, 2018 and will provide comments to the National Capital Planning Commission (NCPC).
- There will be a final EIS and FDA Master Plan review in late summer or early fall 2018.
SECTION 1: SITE DESCRIPTION AND BACKGROUND

Site Description
The U.S. Food and Drug Administration (FDA) is located within the Federal Research Center (FRC), formerly the Naval Surface Warfare Center, which was closed in 1995. The FRC includes 662 acres, of which 622 acres are in Montgomery County and 40 acres are in Prince George’s County. In 1996, 130 acres of the western portion of the FRC was mandated by the federal government for construction of the FDA’s consolidated headquarters. Construction of FDA’s headquarters began in 2001 and the Planning Department reviewed FDA’s campus Master Plans in 2006 and 2009. The main entrance of the FDA campus is 10903 New Hampshire Avenue and the entire headquarters facility is within Montgomery County and within the boundaries of the 2014 White Oak Science Gateway Master Plan.

Background
In 2014, Montgomery County completed a lengthy visioning process for the White Oak area, culminating in the approved and adopted White Oak Science Gateway Master Plan (WOSG). The Master Plan’s vision is aspirational, anticipating that the broader area will benefit from the location of FDA’s headquarters in White Oak. In anticipation of FDA being a catalyst for redevelopment and reinvestment

Figure 1- FDA campus on the FRC
in the greater White Oak area, the Master Plan allows for significant amounts of new development, including the 300-acre "Viva White Oak" project, located adjacent to the FRC’s eastern boundary. The long-awaited relocation of Washington Adventist Hospital, from Takoma Park to White Oak, is underway; the hospital is under construction on a 48-acre site adjacent to the "Viva" property.

One of the most challenging aspects of turning the WOSG Master Plan’s vision into reality is ensuring that the necessary transportation infrastructure is in place to support the planned development. As noted on page 53 of the WOSG Master Plan: The transportation network serving this area will require high quality transit improvements as well as additional road infrastructure to support the potential development envisioned by this Plan. The development envisioned by the 2014 WOSG Master Plan included approximately 9,000 jobs at the FDA, based on the FDA’s 2009 campus master plan update, which limited the number of employees at the facility to 8,889. The growth and expansion of the campus that is described in the 2018 FDA Master Plan, and analyzed in the draft EIS, is a significant increase that requires careful planning for transportation in the White Oak area. It is important that the site’s growth does not outpace the development of the area’s transportation network.

The White Oak area has limited options for new vehicular connections and is particularly constrained by existing development, ownership patterns, environmental resources, and the FRC, where public access is not permitted through the campus. Because these constraints limit opportunities to provide circulation and connectivity, the WOSG Master Plan relies on a robust bus rapid transit (BRT) network, including BRT on US 29, New Hampshire Avenue, and Randolph Road, to relieve congestion and reduce single occupancy vehicle travel.

After the WOSG Master Plan was approved and adopted in July 2014, the County initiated an intensive review of options to address the traffic congestion problems. While we support the transportation mitigation strategies FDA has implemented for the current number of employees, more substantial transportation mitigation strategies will be needed if the campus and the number of employees is going to double in size.

SECTION 2: PROPOSED PROJECT

The following is a description of GSA’s three alternatives; the fourth alternative is a no-build option. Under each of the action alternatives, a distribution center would be constructed under the new plaza and a truck-screening facility would be constructed at the entrance to the FDA campus on Michelson Road. Attachment 4 of this report provides more detail for the three alternatives.

Alternative A: Mid-Rise Buildings: Under this alternative, proposed building heights are comparable to existing building heights. New buildings would be placed at the eastern end of the commons and the plaza would be extended to facilitate a walkable campus. There would be five new office buildings, four new parking garages, a Communications Center, and a Conference Center.
Alternative B: One High-Rise Office Building: Under Alternative B, a 20-story office building would be placed on the eastern end of the FDA campus. Additional mid-rise buildings would also be placed at the eastern end of the commons and the plaza would be extended to facilitate a walkable campus. Proposed building heights would be up to 20 stories. There would be four new office buildings, three to four new parking garages, a Communications Center, and a Conference Center.

Alternative C: Two High-Rise Office Buildings: With Alternative C, two 14-story office buildings would be placed on the eastern end of the FDA campus. Additional mid-rise buildings would also be placed at the eastern end of the commons and the plaza would be extended to facilitate a walkable campus. Buildings would range from 2 to 14 stories. There would be four new office buildings, three to four new parking garages, a Communications Center, a Conference Center, and a free-standing dining facility on the plaza.
SECTION 3: RECOMMENDATIONS

The Montgomery County Planning Department has reviewed the FDA Master Plan and prepared the following comments, organized by the topic areas of environment, transportation, historic preservation, and parks and open space. In addition, comments from other public agencies are attached, including the Prince George's County Planning Department, the Montgomery County Department of Transportation (MCDOT), the Maryland Department of Transportation State Highway Administration (MDOT SHA), and the Hillandale Volunteer Fire Department (see Attachment 1).

Environment
The FRC is located in the Paint Branch sub-watershed and has numerous streams and wetlands draining to the main stem of the Paint Branch. The stream valleys associated with the tributaries of the Paint Branch have steep slopes and highly erodible soils. These characteristics increase the importance of preventing grading and development and preserving and planting forest within the stream valley buffer. The current development on the FDA campus is constrained by the presence of streams and stream valleys, with their associated buffers. While all three development options focus on redeveloping the existing surface parking lots, all three impact the streams and stream valley buffers with new buildings and the associated circulation. The following comments address sewer capacity, stormwater management, forest loss, and mitigation techniques.

Sewer Capacity
WSSC has determined through its sewer modeling that 17,000 feet of sewer in the Paint Branch basin within Montgomery County, and running adjacent to the FRC, will have capacity constraints under projected future wet weather flow conditions. The additional development associated with the planned expansion of the FDA campus has the potential to create sewer overflows. Mitigation has been suggested in the draft EIS, however, GSA should coordinate with developers of neighboring properties and the County to be a part of any solution for the sewer expansion necessary for development so that no overflows occur.
Stormwater Management
Discharge from stormwater management facilities should be minimized and delayed. Due to the presence of steep slopes and highly-erodible soils, the stormwater discharge should be conveyed to the base of the slopes and not released at the top. Stormwater facilities should be located toward the interior of the campus and not in stream-valley buffers. Stormwater Management Area 3, included in all alternatives, should not be located within the stream-valley buffer.

Forest Loss
There will be a loss of forest, but no diagrams are provided to show the areas proposed for clearing. The amount of fragmentation must also be considered. When fragmentation is taken into consideration, it becomes clear that Alternative A will cause more damage to the forest than the clearing of acres indicates.

Mitigation
Staff has determined that, given the location of the development, the first preference for mitigation would be planting forest on steep slopes in stream valley buffers.

Transportation
The increase of employees described in the FDA Master Plan necessitates careful planning for transportation in the White Oak area. Following approval of the WOSG Master Plan in 2014, the County Council directed MCDOT to undertake a comprehensive traffic study for the White Oak Policy Area. The purpose of the study was to identify the transportation network improvements necessary to accommodate build-out of the Master Plan’s proposed density and recommend an equitable way to fund these enhancements. The study analyzed 61 intersections and included the proposed BRT routes within the policy area as well as the reconstruction of the Old Columbia Pike bridge. In February 2017, based on MCDOT’s comprehensive study, the County Council created the White Oak Local Area Transportation Improvement Program, which establishes a pro-rata mitigation payment that is based on peak-hour vehicle trips and will be collected from development applicants to fund the specific intersection, transit, and bikeway improvements itemized in the Council’s resolution.

Staff has provided this detailed background to illustrate the great length the County has gone to address the traffic congestion problems in the White Oak area. The draft EIS includes a Transportation Management Plan (TMP), which states that fifteen of the 27 study area intersections would operate at an overall LOS of E or F in one or more peak hours. In addition to the external intersections, internal intersections adjacent to the primary entry points on Mahan Road and Michelson Road would operate at LOS F in both peak hours. As a result, to mitigate traffic congestion, FDA should include significant contributions for the following major transportation projects:

- Bus Rapid Transit (BRT) on New Hampshire Avenue,
- Future BRT Transit Station in the White Oak Center,
- Connection from FDA’s campus to the White Oak Center, and
- MCDOT bike sharing efforts with stations on the FDA Campus.

In addition to this request for mitigation, the following comments provide more detail about the planned connection between the White Oak Center and the FDA Campus, bicycle and pedestrian connections, and parking.
Planned Connection between FDA and the White Oak Center
The WOSG Master Plan recommends a “Connection to FDA” between the White Oak Center and FDA’s campus, in the vicinity of New Hampshire Avenue and Lockwood Drive, as shown on a graphic from the Master Plan (see Figure 5 below). In the Master Plan, this connection was intended to be primarily a pedestrian and bicycle link for FDA employees, between FDA and the White Oak Center’s existing and future amenities.

Staff supports a vehicular connection in this location to improve transportation access in the White Oak Center, as suggested by MCDOT in their letter to GSA on the draft EIS (see Attachment 1). This would be a major improvement to connectivity in the area, enhancing access to the White Oak Transit Center. FDA should coordinate with MCDOT to facilitate the creation of this connection.

Bicycle and Pedestrian Connections
The TMP in the draft EIS discusses implementation of a “multi-use path” for people that walk and bike on the FDA campus, as well as providing potential connections to Montgomery County’s bikeway systems. FDA should coordinate the design and future connections with the Planning Department. The Planning Board Draft of the Bicycle Master Plan should be available this spring and the plan is expected to be approved by the County Council in fall of 2018. The final EIS should identify the proposed location of the “multi-use path” and should align with the final approved and adopted Bicycle Master Plan.

Other improvements should include, but not be limited to, the following:

- Ensure all sidewalks are upgraded to at least five feet in width;
- Create a five-foot-wide minimum buffer between shared-use paths and the street;
- Upgrade the bikeway on the FDA side of New Hampshire Avenue to a ten-foot-wide shared-use path with a minimum five-foot-wide buffer.
Parking
Currently, there are 6,817 parking spaces for 10,987 employees on the FDA campus. However, due to teleworking programs and other employee options, the average number of employees present at the FDA campus on a weekday is 7,793 employees. Therefore, the average parking ratio on the site is 1 space per 1.14 employees, not 1 space per 1.6 employees, as stated in the draft EIS.

The proposed parking in the draft EIS should follow the federal facility parking ratio policies established in the NCPC’s Comprehensive Plan, which recommends a range of 1 space for 1.5-2 employees. Consistent with the NCPC Comprehensive Plan, as teleworking trends continue to increase regionally, and to support the goals of reducing single occupancy vehicle trips and support transit ridership, the final EIS should include 1 parking space per 2 employees.

In all the alternatives, with the exception of the no-build alternative, impacts to traffic are increased by the inclusion of the East Parking Garage. In Alternative A, the location of the proposed Southeast Parking Garage causes increased impacts to congestion due to its location.

Historic Preservation and Urban Design
FDA is located within the Federal Research Center, which was formerly the Naval Ordnance Laboratory (NOL) campus. In 1979, the County Council adopted the Master Plan for Historic Preservation and the Historic Preservation Ordinance (Chapter 24A). The Master Plan includes the list of all officially-designated historic sites and districts. Sites and districts that have been added to the Master Plan have
been found to be of special historic or architectural significance and merit protection under the Historic Preservation Ordinance. A 10.5-acre environmental setting was designated on the County’s Master Plan for Historic Preservation for the NOL site. In 2002, a Memorandum of Agreement (MOA) between FDA, GSA, the Advisory Council for Historic Preservation, and the Maryland Historical Trust was created for the historic NOL site. As part of the final EIS, a revised MOA should be created to address contributing resources to the NOL site, the view shed from New Hampshire Avenue, and the amenity space within the historic golf course green buffer.

View shed from New Hampshire Avenue
The view shed from New Hampshire Avenue to the main building was not identified as a defining feature of the campus in the 2002 MOA. The County’s Locational Atlas and Master Plan for Historic Preservation encouraged the protection of this vista by designating the areas adjacent to Mahan Road, but did so without specifically identifying this area. The visual connection between New Hampshire Avenue and the traffic circle and main building is important to the character of the site. However, as the rows of oak trees planted on both sides and in the median of Mahan Road grow, the view of the main building from New Hampshire Avenue will become largely obscured. We do not encourage any remedial action related to these trees and the encroachment of the historic vista.

Historic Golf Course Buffer
There has been some discussion of, and desire for, creating an amenity space in the green buffer area along New Hampshire Avenue, which is the former golf course associated with the Naval Ordnance Laboratory. A thoughtfully-designed, low-impact, publicly-accessible feature could be considered, such as a walking trail and benches, which preserves the historic setting and character of the original golf course, but also allows access and enjoyment of the amenity. The design of this amenity and desire for amenity space should be coordinated with the Montgomery County Department of Parks (part of the MNCPPC). Any such alteration would require consultation and approval through the Section 106 process, and further review under the National Environmental Policy Act (NEPA).
Figure 6: Historic view shed from New Hampshire Avenue and golf course green buffer

Any proposed alterations within the 10.5-acre environmental setting designated on the County's Master Plan for Historic Preservation should undergo review, consultation, and comment by the County's Historic Preservation Commission, as the designated Certified Local Government entity.

Parks and Open Space
The Montgomery County Department of Parks (part of the M-NCPPC) would like to work with GSA and FDA to explore the possibilities of expanding recreational amenities in order to provide convenient opportunities for federal employees. The Montgomery County Department of Parks also requests that, during construction of the expanded FDA facility, the limits of disturbance be minimized and limited to the existing developed area in order to protect and maximize the retention of the site's natural resources.

Environmental Restoration
Mitigation, including stream restoration and afforestation/reforestation, should be focused within environmentally-sensitive areas proximate to the main stem of the Paint Branch and its tributaries. The following mitigations are identified in the draft EIS: erosion sediment control plan, subsurface engineering studies, stormwater management plans submitted to the Maryland Department of the
Environment (MDE) prior to construction, and forest management/treer conservation management plans.

There is a collapsed bridge and roadway lying within the floodplain and across the main stem of the Paint Branch on the FRC property. The collapsed bridge concrete and debris should be removed to prevent sediment release and streambank destabilization. This infrastructure appears to have been part of an old perimeter security road for the former Naval Ordnance Laboratory facility.

Open Space/Amenities
Hillandale Local Park is located along the southern boundary of the FRC, fronting on New Hampshire Avenue. The Parks chapter of the WOSG Master Plan recommends the following: Consider acquiring land or an easement from the Federal Research Center (FRC) property adjacent to Hillandale Local Park to allow needed facilities such as an adult rectangular field. The Parks Department would like to work with GSA to explore opportunities to expand recreation amenities at the park, without impacting the historic green buffer along New Hampshire Avenue.

With regard to connectivity beyond the FDA campus, the WOSG Master Plan identified a potential link between FDA and the White Oak Center, as mentioned above. In addition, proposed development of the Viva White Oak project has the potential to provide many synergies between the FDA campus and this new community. Layouts should further reflect pedestrian connections, open space design, building placement, and roadway improvements between the campus, the White Oak Center, and the Viva White Oak development.

Memorandum of Understanding
The Planning Department would like to discuss the potential for a Memorandum of Understanding (MOU) to include the mitigation recommendations outlined in this report as well as the potential strategies going forward. Staff recommends that a MOU be created after the final EIS.
SECTION 4: COMMUNITY CORRESPONDENCE

The following is a list of community meetings held by GSA for the FDA Master Plan and draft EIS:

- September 12, 2017: Scoping meeting on the FDA Master Plan and EIS.
- October 11, 2017: Preliminary Overview of the Master Plan for FDA’s Campus.
- November 14, 2017: Consulting Parties meeting for evaluation and compliance with Section 106 and Section 110 of the National Historic Preservation Act (NHPA).
- February 22, 2018: FDA briefing for the Montgomery County Planning Board.
- April 4, 2018: Consulting Parties meeting for evaluation and compliance with Section 106 and Section 110 of the National Historic Preservation Act (NHPA).

Attachment 3 provides comments staff has received from the community during the review of this Mandatory Referral for the FDA Master Plan and the draft EIS.

SECTION 5: CONCLUSION

Staff recommends approval to transmit comments and recommendations on behalf of the Montgomery County Planning Board to the full Commission of the M-NCPCC. The full Commission will review this Mandatory Referral on May 16, 2018 and will be requested to transmit comments on this item to the National Capital Planning Commission.

ATTACHMENTS
1. Agency Letters
2. Planning Department's letter to GSA on the EIS
3. Community Correspondence
4. FDA Campus Master Plan Alternatives
MEMORANDUM

April 16, 2018

TO:       Paul Gyamfi, NEPA Compliance Specialist
          United States General Services Administration

FROM:     Christopher Conklin, P.E., Deputy Director for Policy
          Department of Transportation

SUBJECT:  2018 Federal Research Center Master Plan
          MCDOT Draft Environmental Impact Statement Comments

Thank you for the opportunity to review the February 2018 Draft Environmental Impact Statement (EIS) for the 2018 Federal Research Center Master Plan, a part of a proposed further consolidation and expansion of the Food and Drug Administration (FDA) Headquarters in White Oak. Attached are our detailed technical comments, of which a few of the more critical items include:

1) **Funding & Implementation**

   It will be critical to estimate the costs for the identified needs, proposed infrastructure, programs, and facilities identified in this plan, and to identify how they will be funded and implemented.

   This also applies to infrastructure assumed in the Background condition. The WhiteOak LATR/LATIP is anticipated to be fully built over the 2040 lifetime of the program. However, the FDA consolidation and expansion is not subject to the LATIP fees and the program is not capable of providing the necessary infrastructure on a schedule commensurate with the growth of the FDA site. In these circumstances, federal funding and a continuous commitment from GSA / FDA / HHS will be critical toward ensuring that capital needs are met, and that programs and services can operate effectively.

   The phasing of the FDA’s growth will be important and is not well-detailed in this draft. Staging triggers should be considered to ensure that parking does not outpace the site’s growth, and that the site’s growth does not outpace the development of the area’s transportation network.

Office of the Director

101 Monroe St., 10th Floor • Rockville, Maryland 20850 • 240-777-7170 • 240-777-7178 FAX
www.montgomerycountymd.gov/dot

301-251-4850 TTY
2) **Major Capital Projects**

It is not immediately clear whether the proposed roadway infrastructure – particularly at the identified intersections – fully mitigates FDA traffic, or how FDA traffic would be able to effectively access the site via the I-1 intersections where conditions are still found to be failing even after mitigation is implemented.

In addition to the intersection treatments, buses/shuttles, and TMP services identified, it remains that the US 29 interchanges and Bus Rapid Transit (BRT) are among our top priorities for the area, and are important to serve the forecast growth at the FDA site. As the analysis in Appendix G continues to find intersections operating at Level of Service E and F, we feel the EIS traffic analysis only reinforces the urgent need for the interchanges and BRT to advance promptly toward implementation. Federal participation will be important toward seeing these major capital projects completed in time to serve FDA’s growth.

3) **Parking Ratio**

The ratio of 1 parking space per 1.8 employees appears to be based on the total employee capacity, and not on the actual number of employees expected to be on campus on a typical day. With this in mind, the ratio appears to be nearer to 1 space per 1.6 employees. We urge that parking needs be revised to reflect the anticipated number of employees traveling to the site on a typical day.

NCPC recommended a parking ratio of 1 space per between 1.5 to 2.0 employees. While a ratio of 1 : 1.8 is reasonable early on, we feel that as non-auto facilities and programs are implemented this ratio should be designed to approach 1 : 2.0 toward the later stages of the site’s development.

Development of the site and associated parking should be properly phased as to ensure that at no point does parking supply exceed the ratios set forth for the project.

4) **Survey Data**

There are inconsistencies between the 2017 Commuter Survey and this survey that should be addressed and reconciled. Our survey shows a significantly lower share of Drive Alone trips, and increased rates of non-auto commutes (including teleworking). A copy of our survey is attached.
Attachment 1

5) **Telework**

There have been indications that rates of teleworking within the federal government may be reduced into the foreseeable future. If this is accurate, reduced telecommuting rates should be accounted for and the traffic analysis updated accordingly to identify additional impacts, treatments, and costs.

6) **Trip Distribution**

The trip distribution appears to reflect the assumption that trip distribution will not significantly change from the home destinations of existing off-site employees. Given the survey results this is not an unreasonable assumption in the shorter-term.

However, it is likely that over the long-term (noting this analysis is for 2040): turnover in employee positions & changes in workers' residences will cause off-site home locations to shift to resemble the on-site home locations. Trip Distribution should reflect a mixture of these two patterns, weighted more toward the on-site pattern.

7) **Publicly Accessible Streets**

As the Paint Branch limits connectivity through this area, a publicly-accessible east-west connection could help disperse traffic loads within the area and reduce pressure on the transportation network. A connection between New Hampshire Avenue and either the VIVA site or Cherry Hill Road could reduce overall impacts of FDA's expansion by providing better public road infrastructure and provide a significant community benefit. Please evaluate whether any such connections are feasible.

8) **Non-Auto Analysis**

While there was significant analysis of vehicular conditions, there was minimal analysis of pedestrian, bicycle, and/or transit conditions as per the County's Subdivision Staging Policy (SSP).

There is limited consideration of the transit network, in particular, to identify what additional facilities and services may be necessary to serve the FDA, including shuttles, WMATA and Ride-On buses, MTA Commuter Buses, and any other related services.

There may be need for additional frequency and capacity, or for increased direct one-seat coverage, increased operating hours, etc. New vehicles or increased demands for service may necessitate additional or more effectively situated depot space, layover areas, and operator facilities.
Attachment 1

9) Transit Center

Locate the transit center as near to the monumental entrance near Mahan Road as feasible, as to reduce walking/biking distance to other points on campus. The facility should be designed to encompass a BRT station (and potentially local bus stop) located on-street along the perimeter road.

We anticipate that the routing of BRT buses will continue from the perimeter road northward across Michelson Road to Lockwood Drive, along the east property line of the existing self-storage site. It is imperative to serving FDA with BRT that the NW Loop be aligned for such a future publicly-accessible connection to Lockwood Drive, as this would provide for a bus connection directly from the FDA site to the White Oak Transit Center.

GSA may wish to also consider whether a future reconstruction of the White Oak Transit Center along Lockwood Drive would be a more ideal use of federal resources, allowing both federal and county needs to be met in a single facility rather than split across two separate facilities. While it would be more distant, last-mile connectivity could be provided through frequent campus shuttles as well as bikeshare and high-quality ped/bike paths.

At the eastern access point into the VIVA White Oak property: consider whether a transit facility may be feasible on FDA property before entering into the secured area. We currently expect this could be an end-of-the-line stop for the Randolph Road BRT, and such a facility could allow buses to turn-around and layover. This site could also provide for internal FDA circulators to ferry passengers to/from the eastern side of the property, linking FDA not only with bus connections but with the VIVA development (expected to be a prominent source of both dining and housing options).

10) Bikeshare

Consider the role of bikeshare within the campus, particularly whether docked/dockless bikes will be permitted on campus, and how they would access the campus. Would bikeshare users be able to use ped-only access points retrofitted to also accommodate bicycle access? Or would bicyclists have to use street access points, in which case how might changes to the design of security gates be made to allow bicyclists to remain separated from traffic, and to avoid queues for motor vehicle inspections?

In the case that policies are highly restrictive toward Bikeshare: consider how any policies toward bikeshare differ from policies toward any other user arriving by their own bicycle, and how policies and procedures might be modified to improve the capability to provide bikesharing options.
Attachment 1

Specifically, also consider whether Bikeshare docks would be permitted on campus, and whether they would be serviceable from both rebalancing and maintenance perspectives. Note that there has been precedent in the region for Bikeshare docks within secured federal facilities.

Should it be infeasible to accommodate existing Bikeshare programs/services on-campus, consider a separate docked or dockless system internally within the campus.

11) TMP

Our detailed comments include a multitude of suggested additions to the draft Transportation Management Plan (TMP). These include a number of suggestions toward each mode, including a suggestion to include parking treatments as a component of the TMP.

Working with area parking operators (both public and private) as well as residential developers (existing and upcoming) could be helpful for implementing new Park & Ride facilities and accompanying shuttle routes, as well as for reducing vehicle miles traveled through workers living nearer to their employment site.

It will be important to ensure that non-auto subsidies match or exceed auto-based subsidies such as those toward parking, and that workers have opt-out options from auto-based subsidies that they can reapply toward non-auto benefits. While subsidies toward transit fares are among the most typical of non-auto benefits, subsidies toward bicycles and shoes can help bolster walking/biking commutes, which place the least demand upon the transportation network.

On-site childcare services and improved Guaranteed Ride Home programs can address some of the most significant concerns in the survey for workers choosing to drive instead of utilize non-auto modes.

Consider how existing and future technologies may integrate into the secured facility, particularly if those using ride-hailing or ride-sharing services (or those seeking to meet Automated Vehicles) must congregate at specified locations.

There is strong opportunity for continuous coordination between GSA, FDA, and HHS with local authorities, particularly through partnering on annual commuter surveys as well as participation in the White Oak Transportation Management District.
Attachment 1

The attached detailed comments include many more items beyond those highlighted above. Should you have any questions regarding our comments on the plan, please feel free to contact me or Mr. Andrew Bossi, Senior Engineer, at 240-777-7200 or andrew.bossi@montgomerycountymd.gov. Our detailed comments can be made available in an Excel spreadsheet, if it would assist with action and response to our comments.

CC: AB

Attachments: Detailed technical comments
2017 Commuter Services Survey

cc: Al Rosdhieh, MCDOT
    Gary Erenrich, MCDOT
    Andrew Bossi, MCDOT
    Peter Fosselman, MCEO
    Jewru Bandeh, ECRSC
    Amy Donin, MCDGS
    Nancy Struegan, MNCPPC
    Troy Leftwich, MNCPPC
    Ed Axler, MNCPPC
    Matt Baker, SHA
April 16, 2018

Mr. Paul Gyamfi
NEPA Compliance Specialist
Office of Planning and Design Quality
Public Buildings Service
National Capital Region
United States General Services Administration
301 7th Street, SW, Room 4004
Washington DC 20407

Dear Mr. Gyamfi:

Thank you for providing the Maryland Department of Transportation State Highway Administration (MDOT SHA) the opportunity to comment on the 2018 Federal Research Center Master Plan draft environmental impact statement (DEIS). The MDOT SHA looks forward to continuing to work with the United States General Services Administration (GSA), the United States Food and Drug Administration (FDA), Montgomery and Prince George’s counties, and the Maryland-National Capital Park and Planning Commission to develop and implement transportation infrastructure to support the Federal Research Center (FRC) at White Oak. The MDOT SHA submits the following comments, addressing the DEIS and appendices G, the transportation technical report, and H, the draft transportation management plan:

General Comments

- Any mention of the “State Highway Administration,” “Maryland State Highway Administration,” “SHA,” “MSHA,” “MDSHA” or the like should be replaced with “the Maryland Department of Transportation State Highway Administration (MDOT SHA)” on first mention and “MDOT SHA,” subsequently. Similarly, any mention of “MTA” or the like should be replaced with “the Maryland Department of Transportation Maryland Transit Administration (MDOT MTA)” on first mention and “MDOT MTA,” subsequently.

- Any road included in the National Highway System (NHS), of which MDOT SHA owned-and maintained I-95, I-495 (Capital Beltway), US 29 (Columbia Pike), and MD 650 (New Hampshire Avenue) in and near White Oak are component facilities, must remain compliant with the transportation performance measure processes, goals, and targets called for in MAP-21 and the FAST Act. Many of these goals are related to traffic operations, capacity, and throughput. While MDOT SHA encourages GSA to study ways to emphasize non-auto modes, improvements at the “expense” of vehicular mobility may lead to a situation where NHS compliance is called into question by the Federal Highway Administration.
Attachment 1

Mr. Paul Gyamfi
Page Two

- This DEIS does not appear to note MDOT SHA’s in-planning I-495 and I-270 Public-Private Partnership (P3) Project announced by Governor Larry Hogan in September 2017. This $7.6 billion investment will implement express toll lanes on I-270 and I-495 in Maryland. Planning funding for these improvements is included in MDOT’s FY 2018-2023 Consolidated Transportation Program (CTP). These improvements are included in the National Capital Region Transportation Planning Board’s (TPB) in-draft long-range transportation plan (LRTP), Visualize 2043, and accompanying regional transportation modeling efforts. As this DEIS analyzes a 2040 scenario, these improvements should be assumed in any modelling that informs this DEIS. The MDOT SHA anticipates completing planning and selecting a concessionaire in 2020. The MDOT SHA requests that this DEIS consider including mention of this project as well as the transportation benefits that will result from implementation of this project.

- In general, intersection design is beyond the scope of a master plan. Nonetheless, future modifications to intersections should not result in failing levels of service on MDOT SHA roadways and will need to be supported by appropriate traffic operations studies at the time improvements are proposed to advance.

- In the development of this DEIS (and the accompanying master plan), did GSA consider implementing campus build-out thresholds whereby specific campus employment populations are accommodated only after previous thresholds’ commute/parking needs are accommodated. Such a consideration may prevent undue stress on the local roadway network and on-campus parking facilities should anticipated non-auto mode shares not be reached.

- The effectiveness of transportation demand management strategies and policy initiatives referenced in this DEIS and appendices should be evaluated comprehensively during the five-year planning phase.

2018 FRC Master Plan DEIS

- p. 43 – Under “Traffic and Transportation,” it is reported that the No-Action Alternative would have negative impacts due to traffic from current development. As the current development is there already, MDOT SHA is not sure why there would be a further negative impact from the site.

- p. 48 – The proposed transportation mitigation measures mention US 29 ITS improvements. It should be noted in this text that such measures will need to be coordinated with MDOT SHA and the Montgomery County Department of Transportation (MCDOT) as is noted for other mitigation measures on the list.
Attachment 1

Mr. Paul Gyamfi  
Page Three

- p. 65 – The report notes in subsection 3.1.7 that few home relocations are expected with the addition of almost 7,000 employees to the site. It is not noted where these people currently work to support this.

- p. 165 – In the first paragraph, it appears that the descriptions of the eastern and western study area limits are switched.

- p. 173 – The description of Michelson Road intersection mitigation describes Mahan Road left-turns.

- p. 174 – The description for US 29 mitigation at Industrial Parkway mentions changes to Old Columbia Pike in the fourth item instead of to Columbia Pike.

DEIS Appendix G – Transportation Technical Report – Project Summary

- p. ii, Conclusions and Mitigation, Transportation Demand Management – The MDOT SHA encourages GSA to work with MDOT SHA, MCDOT, and the Prince George’s County Department of Public Works and Transportation (PGDPW&T) to identify ways to optimize the current network of MDOT SHA and MCDOT park-and-ride facilities, especially by linking potential employee shuttle operations to nearby park-and-ride facilities, and to identify potential sites for network expansion.

- pp. iii-v, Conclusions and Mitigation, Additional Roadway Capacity – The MDOT SHA notes that while funding for design, right-of-way acquisition, and construction remains to be identified (MDOT SHA completed a US 29 corridor FEIS in 1995), US 29 interchanges at Stewart Lane, Tech Road/Industrial Parkway, Musgrove Road/Fairland Road, Greencastle Road, and Blackburn Road remain in MDOT’s CTP, the State’s Highway Needs Inventory, TPB’s regional transportation model, and Montgomery County’s White Oak Local Area Transportation Improvement Program. Therefore, MDOT SHA recommends these interchanges be included in any modelling that informs this DEIS. (The MDOT SHA notes that p. 61 of Appendix G states, “the Action with Mitigation [alternative] evaluates the short-term enhancements only” and not the interchanges.) The MDOT SHA anticipates these five interchanges, collectively, cost approximately $400 million-$600 million. Local transportation priorities are a key driver of MDOT’s project funding decisions. In its 2017 transportation priorities letter, Montgomery County noted that “interchanges have been identified as solution at [some US 29 locations], including Fairland/Musgrove Road and Tech Road/Industrial Parkway, but funding for design and construction has not been identified in the current CTP.” The MDOT SHA requests that GSA consider the benefit of a US 29 interchange at Industrial Parkway (and Tech Road) and consider options to partner with MDOT and Montgomery County to identify funding opportunities for this project.
Attachment 1

Mr. Paul Gyamfi
Page Four

- p. vi, Conclusions and Mitigation, Transit, Pedestrian, and Bicycle Facilities – The MDOT SHA encourages GSA to work with MDOT SHA, MCDOT, and PGDPW&T to identify ways to best accommodate bicyclists and pedestrians in areas adjacent to the FRC. The MDOT SHA maintains various funding mechanisms by which the State, solely, or in partnership with local jurisdictions can develop and implement new or upgrade existing bicycle and pedestrian infrastructure.

DEIS Appendix H – Draft Transportation Management Plan – Section 1 Introduction

- No comments.

DEIS Appendix H – Draft Transportation Management Plan – Section 2 Employee Transportation Survey

- No comments.

DEIS Appendix G – Transportation Technical Report – Section 3 Transportation System

- p. 32, Existing Roadway Network, Vehicle Study Area – In the first paragraph, it appears that the descriptions of the eastern and western study area limits are switched.

- pp. 32-36, Existing Roadway Network – Operations analyses should discuss how the Synchro models used were validated to current conditions.

- p. 36, table 5 (and other tables showing intersection LOS) – The average delays and 95th percentile queues should be reported to better differentiate between operations in separate scenarios when the LOS is the same letter grade.

- p. 44, table 12 – The intersection LOS improves for the US 29 intersection at Cherry Hill Road/Randolph Road when going from Existing Condition to the No Action Alternative. Please explain this and why the LOS remains acceptable in the Build Alternative, as well.

- p. 50 - The proposed transportation mitigation measures mention US 29 ITS improvements. It should be noted in this text that such measures will need to be coordinated with MDOT SHA and MCDOT as is noted for other mitigation measures on the list.

- pp. 50-58, Additional Capacity - See previous comment regarding US 29 interchange project development status, pp. 2-3. In addition, it remains unclear how much short-term improvements such as signal timing and additional lanes would mitigate traffic versus long-term interchange options.
Attachment 1

Mr. Paul Gyamfi
Page Five

- p. 51, New Hampshire Avenue (MD 650) and Powder Mill Road – Thought regarding significant modification requiring right-of-way may be needed for full mitigation, the improvement needed to meet the mitigation requirements should be discussed. Also, based on the results of the Synchro analysis in Exhibit 3, the proposed optimization of signal phase lengths does not appear significantly to improve operations.

- p. 53, New Hampshire Avenue (MD 650) and Northwest Drive/Michelson Road – The description of Michelson Road intersection mitigation describes Mahan Road left turns.

- p. 53, New Hampshire Avenue (MD 650) and Northwest Drive/Michelson Road – The MDOT SHA currently is reviewing local resident concerns regarding cut-through traffic from the FRC via Northwest Drive. Anticipated MD 650 traffic conditions may exacerbate future diversion to the local/residential network without proper mitigation, e.g., signage and restrictions.

- p. 53, New Hampshire Avenue (MD 650) and Lockwood Drive – The suggestion to restrict eastbound Lockwood Drive left-turn movements to northbound MD 650 seems to require difficult wayfinding for US 29 motorists.

- p. 59, Transit, Pedestrian, and Bicycle Facilities – See previous comment regarding bicycle and pedestrian infrastructure development, p. 4.

- p. 60, table 18 – The proposed mitigation is shown to keep US 29 intersection operations at Lockwood Drive at LOS F. Yet, in Exhibit 4, the evening peak-period LOS degrades from LOS E to LOS F with the addition of mitigation. Please check and revise mitigation if it will, in fact, make the intersection operate at a lesser LOS.

- General – It is unclear why these analyses did not include an analysis of the US 29 interchange at MD 650, especially the effect of increased traffic on merges and weaves.

DEIS Appendix G – Transportation Technical Report – Section 4 Conclusions

- pp. 61-65, Additional Roadway Capacity - See previous comment regarding US 29 interchange project development status, pp. 2-3.

- p. 65 - Transit, Pedestrian, and Bicycle Facilities – See previous comment regarding bicycle and pedestrian infrastructure development, p. 4.
Attachment 1

Mr. Paul Gyamfi
Page Six

DEIS Appendix G – Exhibits 1-2

- It appears that northbound US 29 morning peak-period turning volumes at Tech Road were repeated from the interchange at Randolph Road and are lower than MDOT SHA's actual counts.

- Northbound US 29 through movements in the evening peak period appear to be much higher than MDOT SHA's actual counts between MD 650 and Musgrove Road.

- The MD 650 intersection at Powder Mill Road has a relatively significant U-turn movement volume that is not shown in these counts.

DEIS Appendix II – Draft Transportation Management Plan – Executive Summary

- p. ii, Goals – The MDOT SHA supports goals and strategies that seek to lessen the single-occupant vehicles (SOV) on the roadway network and commends GSA for seeking to cut SOV mode share to 54 percent. Nonetheless, this plan does not appear to address what happens on an atypical day. Is a parking “cushion” included in this analysis for those days when the SOV target is not reached?

- p. iii, Strategies, Transit, and Shuttles – This plan, in this and other sections, speaks about increasing the use of commuter bus as a commute mode. While this plan notes that MDOT MTA Commuter Bus 204 currently stops at the FRC, the plan does not appear to note that MDTA MTA Commuter Bus routes 305 (Columbia-Washington via US 29), 315 (Columbia-Washington via US 29), and 325 (Columbia-Washington via US 29) all pass near to the FRC and that it may be a viable option to work with MDOT MTA to amend these routes also to stop at the FRC.

- p. iv, Strategies, Bike/Walk to Work – This plan should note (and does in other locations) that many roadways in the area are owned and maintained by MDOT SHA. Bicycle and pedestrian accommodations upgrades along such roads (I-95, I-495 (Capital Beltway), US 29 (Columbia Pike), and MD 650 (New Hampshire Avenue)) should be coordinated with both MDOT SHA and the applicable local jurisdiction.

DEIS Appendix H – Draft Transportation Management Plan – Section 1 Introduction

- p. 4, section 1.1.1.3 Transportation Planning Board (TPB) – Currently, Metropolitan Washington Council of Governments staff is drafting and conducting modeling activities for Visualize 2045, which TPB anticipates adopting in the Fall of 2018. This new LRTP will include TPB's policy framework to guide future regional transportation investments and a fiscally-constrained list of projects planned for implementation between 2018 and 2045.
Attachment 1

Mr. Paul Gyamfi
Page Seven

- US 29 interchanges at Stewart Lane, Tech Road/Industrial Parkway, Musgrove Road/Fairland Road, Green castle Road, and Blackburn Road are included in this draft document. This new LRTP will replace the existing Constrained Long-Range Plan (adopted 2016). This DEIS should reflect TPB’s regional transportation model.

- p. 5, section 1.1.3 Local – Currently, Montgomery County Planning Department staff is drafting a comprehensive update to the Master Plan of Highways and Transitways, the first comprehensive update to the plan since 1955. This plan is to be adopted in late 2018 or early 2019.

DEIS Appendix H – Draft Transportation Management Plan – Section 2 Transportation System

- p. 8, section 2.1 Local Roadway Network – This plan should note that I-95, I-495, US 29, and MD 650 are components of the NHS. In addition, this plan should note that these roadways are owned and maintained by MDOT SHA. Cherry Hill Road is owned and maintained by Montgomery and Prince George’s counties in their respective jurisdictions.

- p. 8, section 2.1 Local Roadway Network – This plan states that the posted speed limit on I-95 is 55 mph. North of I-495, the posted speed limit is 65 mph.

- p. 11, section 2.3.2.1 Bus Rapid Transit (BRT) – The MDOT SHA recommends this plan clarify the extent of US 29 BRT improvements. The popular conception of BRT is a bus running in a fixed, dedicated lane or lanes. Montgomery County’s planned US 29 BRT does not include all elements of full BRT.

- p. 18, section 2.5.1 White Oak Master Plan – This plan states that improvements identified in the White Oak Master Plan are assumed already to be constructed in the No Action condition. Is there any assurance that these will be completed prior to FRC build-out?

DEIS Appendix H – Draft Transportation Management Plan – Section 3 Existing Employee Behavior

- No comments.

DEIS Appendix H – Draft Transportation Management Plan – Section 4 Traffic Impact Analysis

- p. 45, section 4.0 Traffic Impact Analysis – In paragraph one, clarify that the “FDA Master Plan Traffic Technical Report (TTR)” and Appendix G are one in the same, or that one is an update to the other.

- p. 45, section 4.0 Traffic Impact Analysis, Transportation Demand Management – See previous comment regarding park-and-ride network development, p. 3.
Attachment 1

Mr. Paul Gyamfi
Page Eight

- p. 46, section 4.0 Traffic Impact Analysis, Additional Capacity – See previous comment regarding US 29 interchange project development status, pp. 3.

Thank you again for the opportunity to comment on the 2018 FRC Master Plan DEIS. If you have questions, please contact Mr. Matt Baker, MDOT SHA Regional Planner, at 410-545-5668, toll free 1-888-204-4828, or via email at mbaker4@sha.state.md.us.

Sincerely,

[Signature]

Samantha Biddle
Chief
Regional and Intermodal Planning Division

cc: Ms. Mary Gibert, Public Buildings Service Regional Commissioner, National Capital Region, GSA
Ms. Stephanie Hamlett, AICP, Chief, Planning Branch, National Capital Region, GSA
Shelly Jones, AIA, Community Planner, National Capital Region, GSA
Mr. Matt Baker, Regional Planner, MDOT SHA
TO: S. Jones, GSA  
FROM: R. Hartung, HVFD  
RE: Hillandale Fire Station 12 Expansion

Hillandale Fire Station 12, located at 10617 New Hampshire Avenue, Silver Spring, MD 20902, is a 3-apparatus bay facility that also houses the Hillandale Volunteer Fire Department (HVFD) administrative offices, meeting room and vehicle maintenance shop.

The HVFD purchased and was granted the property upon which the fire station was built in 1941. GSA provides detailed information on the history of the property, the site acquisition by the HVFD and the site layout.

In 1988 the Department of the Navy designated the HVFD as the primary fire, rescue and emergency medical services provider to Federal Government's White Oak campus, 10903 New Hampshire Avenue, Silver Spring, MD 2093.

Since that time much change and growth has occurred in the HVFD primary response area. Most recent activity includes: the proposed White Oak Campus expansion of @ 9,000 individuals; the anticipated redevelopment of the "George Meany Center; the development of the Duffy Property at Powder Mill Road and New Hampshire Avenue; the creation of a "Science Park" on Cherryhill Road; and the configuration of the M-NCPCC parkland on New Hampshire Avenue.

While the HVFD will continue to provide fire, rescue and emergency medical services to the community during and after this area expansion, the existing Fire Station 12 facility is rapidly becoming longer sufficient in size and configuration to adequately meet the expanded service area's demands.

The HVFD is in the early stages of a Fire Station 12 renovation/expansion project. Funds have been earmarked to conduct a facility assessment of the current fire station in the Spring of 2018. Once the Fire Station 12 facility assessment is completed, the HVFD will have a good understanding of what components of the existing structure can be retained and renovated.

However, a renovation alone will not allow the HVFD to continue to meet its service delivery needs.

The current 3-bay apparatus room sits above grade and does not allow for the "drive-through" of the emergency response vehicle. This requires the vehicles to stop traffic on New Hampshire Avenue, while they are backed into the fire station. The apparatus bays are of limited size and depth in relation to the size of modern fire, rescue and emergency medical services vehicles.

Critical to any upgrade and expansion to Fire Station 12 would be the inclusion of 4 additional apparatus bays of sufficient size to house modern emergency services vehicles. Therefore, the HVFD would like to engage in discussion with the GSA towards the acquisition of a 10 acre parcel on the White Oak Campus adjacent to the existing Fire Station 12 property. The acquisition of a parcel of this size will allow the HVFD to construct the additional 4 apparatus bays, provide for sufficient fire department personnel.
and public parking and meet any land development requirements (storm water management, building setbacks, etc.).

Such an expansion along with the renovation of the existing Fire Station 12 building, will allow the HVFD to continue to serve the needs of the community - including the White Oak Campus expansion, the MNCPPC park reconfiguration, the New "Science Park" and the redeveloped "George Meany" Center.

The HVFD looks forward to your comments and assistance on this project, as the HVFD continues to work with community it serves, the County, State and Federal elected officials and agencies.

Please do not hesitate to contact me, should you have any follow up questions to this email. I can be contacted at the email address and phone number listed below.

Russell Hartung, President
Hillandale Volunteer Fire Department
Attachment 1

NAVMATINST 11320.10A

MUTUAL AID FIRE FIGHTING ASSISTANCE AGREEMENT

THIS AGREEMENT, made and entered into this 12th day of Sep 1988 by and between Hillendale Volunteer Fire Department, and the Commanding Officer, Naval Surface Warfare Center White Oak, Maryland.

WITNESSETH:

WHEREAS, each of the parties hereto maintains equipment and personnel for the suppression of fires within its own areas, and

WHEREAS, the parties hereto desire to augment the fire protection available in their respective areas, and

WHEREAS, the lands or districts of the parties hereto are adjacent or contiguous so that mutual assistance in a fire emergency is deemed feasible, and

WHEREAS, it is the policy of the Navy Department and NSWC to conclude such agreements wherever practicable, and

WHEREAS, it is mutually deemed sound, desirable, practicable, and beneficial for the parties to this agreement to render assistance to one another in accordance with these terms;

THEREFORE BE IT AGREED THAT:

1. The rendering of assistance under the terms of this agreement shall be accomplished in accordance with detailed plans and procedures of operation drawn and agreed to by the technical heads of the Fire Departments involved.

2. Whenever it is deemed advisable by the senior officer of a fire department belonging to a party to this agreement, or by the senior officer of such fire department actually present at a fire, to request fire fighting assistance under the terms of this agreement, he/she is authorized to do so, and the senior officer on duty of the fire department receiving the request shall forthwith take the following action:

   a. Immediately determine if the requested apparatus and personnel are available to respond to the call.

   b. In accordance with the terms of this agreement, forthwith dispatch such apparatus and personnel, as in the judgment of the senior officer receiving the call should be sent, with instructions as to their mission.
3. The rendering of assistance under the terms of this agreement shall not be mandatory, but the party receiving the request for assistance shall immediately inform the requesting service if assistance cannot be rendered.

4. The parties hereto waive all claims against every other party for compensation of any loss, damage, personal injury, or death occurring in consequence of the performance of this agreement.

5. All services performed under this agreement shall be rendered without reimbursement of either party or parties, except that the Hillendale VFD, Co's #12 & #24 shall be entitled to seek reimbursement pursuant to the section 11 of the Federal Fire Prevention and Control Act of 1974 (15 U.S.C. 2217) and Federal regulations issued thereunder (Title 45 of the Code of Federal Regulations 2010) for all or any part of direct expenses and losses (additional fire fighting cost over and above normal operating cost) incurred in fighting fires on property under the jurisdiction of the United States.

6. The senior officer of the fire department of the requesting service shall assume full charge of the operations. However, under procedures agreed to by the technical heads of the fire departments involved, a senior officer of the department furnishing the assistance may assume responsibility for the coordination of the overall operation.

7. The various officers and personnel of the fire departments of the parties to this agreement are invited and encouraged, on a reciprocal basis, to frequently visit each other's activities for guided familiarization tours consistent with local security requirements and, as feasible, to jointly conduct pre-fire planning inspections, drills and training.

8. This agreement shall become effective upon the date hereof and shall remain in full force and effect until cancelled by mutual agreement of the parties hereto or by written notice by one party to the other party with sixty (60) days notice of said cancellation.

IN WITNESS WHEREOF, the parties hereto have executed this agreement at NSWC White Oak, MD on the day and year first above written.

FOR THE HILLENDALE VOLUNTEER FIRE DEPARTMENT, CO's #12 & #24

FIRE CHIEF, 9-12-XX

FOR THE NAVAL SURFACE WARFARE CENTER-WHITE OAK, MD FIRE DEPARTMENT

FIRE CHIEF 9-12-XX

COMMANDING OFFICER 9/12/XX
April 13, 2018

Mr. Paul Gyamfi
Office of Planning and Design Quality
Public Buildings Service
National Capital Region
U.S. General Services Administration
301 7th Street, SW, Room 4004
Washington, DC 20407

SUBJECT: 2018 FEDERAL RESEARCH CENTER MASTER PLAN
Draft Environmental Impact Statement

Dear Mr. Gyamfi:

The Montgomery County Planning Department appreciates the opportunity to review the Draft Environmental Impact Statement (EIS) for the federal Food and Drug Administration’s (FDA) headquarters, located in the White Oak community. FDA is located within the Federal Research Center (FRC), formerly the Naval Surface Warfare Center, which was closed in 1995. The FRC includes 662 acres, of which 622 acres are in Montgomery County and 40 acres are in Prince George’s County. In 1996, 130 acres of the western portion of the FRC was mandated by the federal government for construction of the FDA’s consolidated headquarters. The main entrance of the campus is at 10903 New Hampshire Avenue and the FDA site is entirely within Montgomery County. Construction of FDA’s headquarters began in 2001 and the Planning Department reviewed FDA’s campus master plans in 2006 and 2009.

The Draft EIS states that the FDA intends to substantially expand the campus to increase the total number of employees to 18,000 over the next seven to seventeen years, from 2025 to 2035. This letter provides comments regarding potential mitigation for the environmental, historical, and transportation impacts resulting from the addition of 9,000 employees to the facility.
Background

In 2014, Montgomery County completed a lengthy visioning process for the White Oak area, culminating in the approval of the 2014 *White Oak Science Gateway Master Plan*. The FDA, and most of the FRC property, is within the boundaries of the *White Oak Science Gateway Master Plan* (WOSG). The Master Plan’s vision is aspirational, anticipating that the entire area will benefit from the FDA location in White Oak. In anticipation of FDA being a catalyst for redevelopment and reinvestment in the greater White Oak area, the Master Plan allows for significant amounts of new development, including the 300-acre “Viva White Oak” project, located adjacent to the FRC’s eastern boundary.

One of the most challenging aspects of turning the WOSG Master Plan’s vision into reality is ensuring that the necessary transportation infrastructure is in place to support the planned development. As noted on page 53 of the WOSG Master Plan: *The transportation network serving this area will require high quality transit improvements as well as additional road infrastructure to support the potential development envisioned by this Plan.* The development envisioned by the 2014 WOSG Master Plan included approximately 9,000 jobs at the FDA, based on the FDA’s 2009 campus master plan update, which limited the number of employees at the facility to 8,889. The increase of employees described in the Draft EIS is a significant increase to the campus and requires careful planning for transportation in the White Oak area.

The White Oak area has limited options for new vehicular connections and is particularly constrained by existing development, ownership patterns, environmental resources, and the FRC, where public access is not permitted through the campus. Because these constraints limit opportunities to provide circulation and connectivity, the WOSG Master Plan relies on a robust bus rapid transit (BRT) network, including BRT on US 29, New Hampshire Avenue, and Randolph Road to relieve congestion and reduce single occupancy vehicle travel.

After the WOSG Master Plan was approved and adopted in July 2014, the County initiated an intensive review of options to address the traffic congestion problems. While we support the transportation mitigation strategies FDA has implemented for the current number of employees, more substantial transportation mitigation strategies will be needed if the campus and the number of employees is going to double in size.
After reviewing the Draft EIS, which includes a total of four alternatives, one of which is a no-build alternative, the Montgomery County Planning Department staff has the following comments organized by the topic areas of environment, historic preservation and urban design, and transportation.

Environment

There are sensitive environmental features that limit development on the FRC site. The following comments address sewer capacity, stormwater management, forest loss, and mitigation techniques.

Sewer Capacity
The Draft EIS acknowledges that the additional development associated with the planned expansion of the FDA campus has the potential to create sewer overflows. Some potential mitigation strategies are suggested in the Draft EIS. However, GSA should coordinate with developers of neighboring properties to be a part of any solution for the sewer expansion necessary for development.

Stormwater Management
Discharge from stormwater management facilities should be minimized and delayed. Due to the presence of steep slopes and highly erodible soils, the stormwater discharge should be conveyed to the base of the slopes and not released at the top. Stormwater facilities should be located toward the interior of the campus and not in stream valley buffers. Stormwater Management Area 3, included in all alternatives, should not be located within the stream valley buffer.

Forest Loss
The Draft EIS discusses the loss of vegetation, but no diagrams are provided to show the areas proposed for clearing. While the detailed numbers of acres being cleared is important, the amount of fragmentation is also important and should be considered. Alternative A will cause more damage to the forest than the clearing of acres indicates.

Mitigation
The Draft EIS does not include any specific areas of mitigation or types of mitigation and only includes a list of techniques in the Environmental Guidelines. Given the location of the
development, the first preference for mitigation would be planting forest on steep slopes in stream valley buffers.

**Historic Preservation and Urban Design**

FDA is located within the Federal Research Center, which was formerly the Naval Ordnance Laboratory (NOL) campus. In 1979, the County Council adopted the *Master Plan for Historic Preservation* and the Historic Preservation Ordinance (Chapter 24A). The Master Plan includes the list of all officially designated historic sites and districts. Sites and districts which have been added to the Master Plan have been found to be of special historic or architectural significance and merit protection under the Historic Preservation Ordinance. The NOL’s 10.5-acre environmental setting was designated on the County’s *Master Plan for Historic Preservation*. In 2002, a Memorandum of Agreement (MOA) between FDA, GSA, the Advisory Council for Historic Preservation, and the Maryland Historical Trust was created for the historic NOL site. As part of the Final EIS, a revised MOA should be created to address contributing resources to the NOL site, the views from New Hampshire Avenue, and the amenity space within the historic golf course green buffer.

**Contributing Resources**

In the 2002 MOA, there was a determination that the main building, the firehouse portion of Building 100, the traffic circle with the flagpole, and the green buffer historic golf course are all contributing resources to the original Naval Ordnance Laboratory campus. The Planning Department concurs with this determination. The four alternatives in the Draft EIS will avoid any impact on the identified contributing resources.

To reinforce the MOA determination, the following language and map should be included in the EIS National Environmental Policy Act (NEPA) documentation, the Section 106 review, and the consultation portions of the document as well as the revised MOA:

“The 2014 *White Oak Science Gateway Master Plan* established a 10.5-acre environmental setting for the Naval Ordnance Laboratory (NOL) as identified in red on Figure 1, below, which includes the Administration Building, the traffic circle and axial entrance drive, open spaces on both sides of the drive, and a commemorative installation along the southeast façade.”
Viewshed from New Hampshire Avenue

The viewshed from New Hampshire Avenue to the main building was not identified as a defining feature of the campus in the 2002 MOA. The County’s Locational Atlas and Master Plan for Historic Preservation encouraged the protection of this vista by designating the areas adjacent to Mahan Road, but did so without specifically identifying this area. The visual connection between New Hampshire Avenue and the traffic circle and main building is important to the character of the site. However, as the rows of oak trees planted on both sides and in the median of Mahan Road grow, the view of the main building from New Hampshire Avenue will become largely obscured. We do not encourage any remedial action related to these trees and the encroachment of the historic vista.

Historic Golf Course Buffer

There has been some discussion of, and desire for, creating an amenity space in the green buffer area along New Hampshire Avenue, which is the former golf course associated with the Naval Ordnance Laboratory. A thoughtfully designed, low impact, publicly-accessible feature could be considered, such as a walking trail and benches, which preserves the historic setting and character of the original golf course, but also allows access and enjoyment of the amenity. Any such alteration would require consultation and approval through the Section 106 process, and further review under NEPA. Any proposed alterations within the 10.5-acre environmental setting designated on the County’s Master Plan for Historic Preservation should undergo review, consultation, and comment by the County’s Historic Preservation Program, as the designated Certified Local Government entity.
Transportation

The increase of employees described in the Draft EIS necessitates careful planning for transportation in the White Oak. Following approval of the WOSG Master Plan in 2014, the County Council directed the Montgomery County Department of Transportation (MCDOT) to undertake a comprehensive traffic study for the White Oak Policy Area. The purpose of the study was to identify the transportation network improvements necessary to accommodate build-out of the Master Plan’s proposed density and recommend an equitable way to fund these enhancements. The study analyzed 61 intersections and included the proposed BRT routes within the policy area as well as the reconstruction of the Old Columbia Pike bridge. In February 2017, based on MCDOT’s comprehensive study, the County Council created the White Oak Local Area Transportation Improvement Program, which establishes a pro-rata mitigation payment, based on peak-hour vehicle trips, that will be collected from development applicants to fund the specific intersection, transit, and bikeway improvements itemized in the Council’s resolution.

We provide this detailed background to illustrate the great length the County has gone to address the traffic congestion problems in the White Oak area. The Draft EIS states that fifteen of the 27 study area intersections would operate at an overall LOS of E or F in one or more peak hours. In addition to the external intersections, internal intersections adjacent to the primary entry points on Mahan Road and Michelson Road would operate at LOS F in both peak hours. As a result, to mitigate traffic congestion, the EIS should include significant contributions for the following major transportation projects:

- Bus Rapid Transit (BRT) on New Hampshire Avenue,
- Future BRT Transit Station in the White Oak Center,
- Connection from FDA’s campus to the White Oak Center, and
- MCDOT bike sharing efforts with stations on the FDA Campus.

In addition to this request for mitigation, the following are more specific comments about the planned connection between the White Oak Center and the FDA Campus, bicycle and pedestrian connections, and parking.

**Planned Connection between FDA and the White Oak Center**
The WOSG Master Plan recommends a “Connection to FDA” between White Oak Center at the corner of New Hampshire Avenue and Lockwood Drive and FDA’s campus. In the
Master Plan, this connection was intended to be primarily a pedestrian and bicycle link for FDA employees, between FDA and the White Oak Center's existing and future amenities.

The Planning Department supports a vehicular connection in addition to a pedestrian and bicycle link in this location to improve transportation access in the White Oak area, as recently suggested by MCDOT in their review of the EIS. This would be a major improvement to connectivity in the area. FDA should coordinate with MCDOT to facilitate the creation of this connection.

Bicycle and Pedestrian Connections
The EIS Transportation Management Plan discusses implementing a multi-use path for people that walk and bike on the FDA campus and to provide potential connections to Montgomery County's bikeway systems. FDA should coordinate the design and future connections with the Planning Department. The Planning Board Draft of the Bicycle Master Plan should be available by early May 2018 and the plan is expected to be approved by the Council in the fall of 2018. The Final EIS should identify the proposed location of the multi-use path and should align with the final approved and adopted Bicycle Master Plan.

Other improvements should include, but not be limited to, the following:

- Ensure all sidewalks are upgraded to at least five feet in width;
- Create a five-foot-wide minimum buffer between shared use paths and the street;
- Upgrade the bikeway on the FDA side of New Hampshire Avenue to a ten-foot-wide shared use path with a minimum five-foot-wide buffer.

Parking
Currently on the FDA campus there are 6,817 parking spaces for 10,987 employees. However, due to teleworking programs and other working options, the average number of employees present at the office on a weekday is 7,793 employees. Therefore, the average parking ratio on the site is 1 space per 1.14 employees, not 1 space per 1.6 employees, as stated in the EIS.

The proposed parking in the EIS should follow the federal facility parking ratio policies established in the National Capital Planning Commission’s (NCPC) Comprehensive Plan which recommends a range of 1 space for 1.5-2 employees. Consistent with the NCPC Comprehensive Plan, as teleworking trends continue to increase regionally, and to support the
goals of reducing single occupancy vehicle trips and support transit ridership, the Final EIS should include 1 parking space per 2 employees.

In all alternatives, with exception to the no-build alternative, impacts to the traffic are increased by the inclusion of the East Parking Garage. In Alternative A, the location of the proposed Southeast Parking Garage causes increased impacts to congestion due to its location and the associated circulation.

Memorandum of Understanding

The Planning Department would like to discuss the potential for a Memorandum of Understanding (MOU) to include the recommendations for mitigation and potential strategies going forward. We recommend that a MOU be created after the final EIS.

Conclusion

The Montgomery County Planning Department will continue to discuss strategies for mitigation with GSA through the final stages of the EIS. Thank you for the opportunity to review and comment on this draft. If you have any questions, please contact Troy Leftwich of the Area 2 Planning Division at 301-495-4553, or by email at troy.leftwich@montgomeryplanning.org.

Sincerely,

Gwen Wright
Director
From: Eileen Finnegan
To: Lebch, Troy
Subject: Re: Comments on Draft 2018 FDA Federal Research Center Master Plan
Date: Monday, April 16, 2018 8:59:52 PM
Attachments: connectionofFDA.JPG

FYI

----- Forwarded Message -----
From: Eileen Finnegan <finnegan20903@yahoo.com>
To: Paul G Yamfi - WPDBA <paul.gyamfi@gsa.gov>
Cc: Dawud Abdur-Rahman - WPDB <dawud.abdur-rahman@gsa.gov>; Shelly Jones - WPDBA <shelly.jones@gsa.gov>; Stephanie Hamlett - Wpdba <stephanie.hamlett@gsa.gov>
Sent: Monday, April 16, 2018, 8:58:02 PM EDT
Subject: Re: Comments on Draft 2018 FDA Federal Research Center Master Plan

Hello Mr. G Yamfi,

Thank you for the opportunity to comment on the Draft Master Plan and EIS for the further consolidation of the FDA at White Oak. I also extend my thanks to GSA staff and their consultants who have reached out to the public by holding local meetings and engaging in Q&A.

Planning for the ultimate consolidation of the FDA on the agency’s existing campus at White Oak is a very desirable goal with efficiencies for the FDA and significant cost savings over leased facilities. While in strong support of this plan, I offer a few comments to strengthen several details.

1. Acknowledging that FDA and GSA are preparing an “FDA HQ Housing Strategy/Mitigation Plan” for the near-term, I request that the rationale and need for this secondary plan be explained within the Final FDA Master Plan at the Federal Research Center. If, as anticipated in the Draft Plan, further consolidation on campus will begin in ten years and be completed in fifteen, the interim short-term housing strategy is key to understanding the implementation the Final Master Plan.

2. The on-campus transit center proposed in all three alternatives is a valuable improvement for FDA employees. A further transit improvement would be for GSA/FDA to work with the Montgomery County Department of Transportation to realize the connection directly to the White Oak Transit Center on Lockwood Drive, as detailed in the White Oak Science Gateway Master Plan (detail attached). Having pedestrian and BRT/Bus passage from the existing campus to the commercial section of White Oak would improve transit times, and facilitate employee and FDA-visitor access to the campus. This would further encourage community connections.

3. The Traffic Analysis, Appendix G, reveals the stark reality of future traffic congestion on New Hampshire Avenue, with or without additional consolidation. Thank you for providing these studies. It is clear that Montgomery County and the State of Maryland need to collaborate on infrastructure plans to address the bottlenecks and assure a high quality of transportation services in the corridor. A commitment from GSA to work with the state and local agencies to address the deficiencies on New Hampshire Avenue is critical for the existing FDA facility and the ultimate FDA campus.

4. Slanect’s Traffic Analysis used the 2015 Sabra Wang Study (for the Local Area Transportation Improvement Plan), but then, at the direction of the Montgomery County Department of Transportation, added several specific development projects (Adventist Hospital, DAR Cars, White Oak Town Center, Hillendale Gateway; see: Appendix G, page 40). Please confirm that this has not resulted in double counting for some or all of these developments, especially Hillendale Gateway.

5. Although the near-term FDA HQ Housing Strategy/Mitigation Plan undoubtedly assumes that all traffic impacts will be the responsibility of the private property owner, there is one aspect which GSA/FDA should evaluate: employees using the internal FRC roadway as a cut-through for travel to and from work.
Attachment 3

For example, consider any FDA employees at a leased facility on FDA Boulevard using the New Hampshire Avenue Beltway exit by traveling through the campus to/from work. This would certainly cut their travel time. This real world work-around is not considered in any travel model for the area.

I look forward to the release of the Final FDA Master Plan in the coming months.

Regards,
Eileen Finnegan
10404 Sweetbriar Parkway
Silver Spring, MD 20903
Attachment 3

Greater Colesville Citizens Association
PO Box 4087
Colesville, MD 20914
March 22, 2018

General Services Administration
National Capital Region
Office of Planning and Design Quality
Public Buildings Service
Attn: Paul Gyamfi
301 7th Street. SW, Room 4004
Washington DC 20407

Dear Mr. Gyamfi

I am Dan Wilhelm, President of the Greater Colesville Citizens Association (GCCA) and this testimony reflects the Association's view. I am also a member of LABQUEST focusing on transportation and therefore the transportation part of this testimony also reflects the Labquest view. I have been in the middle of all the efforts described below including the November 2013 Countywide Transit Corridors Functional Master Plan, July 2014 White Oak Science Gateway (WOSG) Master Plan (MP), November 2016 Subdivision Staging Policy (SSP), February 2017 White Oak Local Area Transportation Improvement Program (LATIP), and related county Capital Improvement Program (CIP) budget actions taken by the County Council and currently before the Council. Therefore, I have detailed knowledge on these subjects. Note that the draft Environment Impact Statement (EIS) calls the LATIP by the name Local Area Transportation Review (LATR), which is different but related.

I have organized the comments into three sections: EIS Alternatives, transportation external to the Federal Research Center (FRC) and external transportation integration with the FRC.

EIS Alternative

GCCA strongly supports expanding the FRC to accommodate the projected 18,000 workers, mostly from the FDA. We want more economic development in the eastern part of Montgomery County to provide jobs in our area to minimize the need to drive to I-270, Washington DC, Columbia or other job centers more than a half hour away. The jobs will allow a wide range of additional benefits, including restaurants and entertainment.

Until the Master Plan is approved, development allowed under the prior master plan should continue. We understand that funds may not be available at this time and as such we suggest leasing nearby facilities until then.

Our main comment on alternatives deals with visual appearance. We don't support the 20 level tower height in Alternative B because it will be highly visible above the buildings closest to New Hampshire Ave. From this aspect, we prefer Alternative A. We also prefer a compact campus to minimize the distance between facilities to foster collaboration and to be close to the transit center to encourage use of public transit. To achieve those objectives, we like the office building around the conference center near New Hampshire Ave and not having the B level office building near the southeast parking garage, as shown in Alternatives B and C. We also would want to avoid the pedestrian bridge shown in Alternative A so people can walk between buildings without the need to go outside. Overall, Alternative C is the
Attachment 3

best alternative. Ideally, the height of the two 14 level buildings should be lowered to 10-12 levels and the needed space shifted to the nearby 7 level building.

External Transportation

The draft EIS predicts that congestion will to be substantially worse even under the no-action alternative compared with the existing condition (Table 20 on page 171). It predicts that the congestion level under any of the build alternatives will be only somewhat worse than the no-action alternative. It then proposes improvements be added to the LATIP and that the implementation needs to be coordinated with the Montgomery County and/or State Highway Administration (SHA). Congestion data for the three action alternatives is shown on pages 172 and 173 and Appendix G, Part 3.

Congestion Known

According to the WOSG MP, Montgomery County realizes that the area is currently congested and that the development proposed by that plan would only make the situation worse. To address that possible congestion, the county is implementing Bus Rapid Transit (BRT) and has put the LATIP process in place.

Draft EIS Overstates Congestion

The Draft EIS assumes no transportation improvements will be made. With the implementation of the BRT, LATIP and other improvements, the no-action congestion would be much less. It is unlikely that congestion will be completely eliminated. As explained below, the implementation of transportation improvements are expected to be made before the FRC expansion can occur and therefore the draft EIS overstates the future congestion.

The report indicates that the no-action alternative used data provided by Sabra Wang & Associates that was prepared as part of the LATIP. We support use of that data. However, StanTec, the GSA Traffic consultant for transportation, apparently was unaware that the Sabra Wang traffic data already included 1,483,936 square foot of additional bioscience development on the FRC. Thus the no-action alternative congestion predictions are essentially the action alternative predictions. The no-action alternative prediction would be lower, but the area would still be congested if the WOSG MP development occurred but the implementation of the improvements didn’t occur. Nevertheless, the Draft EIS recommended approach to coordinate with Montgomery County and SHA is still valid. The detailed EIS solutions might change, but the LATIP solutions are not final anyway.

The traffic data provided by Sabra Wang probably over states the projected vehicle traffic volume. The data was developed by the Montgomery County Planning Department. They had to split the trips between vehicle, transit, walking and bicycling. The Planning Department didn’t have data about how the local bus routes would be changed and expanded as part of the Bus Rapid Transit (BRT) projects and just used existing local routes. Thus the number of transit trips is surely understated and vehicle trip overstated.

At this time, reliable transit data is not available. Montgomery County Department of Transportation presented initial concepts for changing the local bus routes related to the US29 BRT at a meeting on February 26, 2018. Actual local bus route changes related to the US29 BRT will not be firmly known until 2019. Once BRT becomes operational on New Hampshire Ave and Randolph Road, the number of vehicle trips will be further reduced. Even if the routes were known, there is no agreement on how
many trips would shift from vehicle to transit. The design of LATIP solutions will need to take that into account as they are developed and implemented over the next decade.

In addition, the road classifications for some of the roads and their speed limits are incorrectly stated as identified in the attachment 1. These errors will result in slightly higher congestion levels, but the difference is minor.

Montgomery County Processes to Avoid Congestion Getting Worse

There are five methods by which transportation improvements will be made in Eastern Montgomery County, as follows:

Approved Subdivision Approvals before January 2017. Before the latest version of the SSP was approved in late 2016, developers who received a subdivision approval had to make road improvements under the Local Area Transportation Review (LATR). As a result, White Oak Hospital Center will be making some improvements in the Cherry Hill Rd, Plum Orchard Dr and Broadbirch Dr area. Another development, known as White Oak Town Center, is planned at the intersection of Industrial Parkway and Old Columbia Pike and is expected to make some improvements on Industrial Pkwy near that intersection.

Viva White Oak. The County owns Site II, 115 acres at the current end of Industrial Pkwy. The County formed a partnership with the Global LifeSciences Development Corporation (GLDC) to develop that land and the 165 adjacent acres that GLDC owns. After GLDC obtains Planning Board approval of the subdivision plan for the combined 280 acres and the county demolishes the existing buildings on Site II, title to the county land will be transferred to GLDC. The county has already appropriated $40M as its contribution to improve FDA Blvd, extend Industrial Pkwy to FDA Blvd, and build road B5 from FDA Blvd to the property line. White Oak Medical Center will complete B5 to Plum Orchard Dr. The Council also appropriated funds to demolish the old Site II buildings and undertake any required environmental clean-up.

Bus Rapid Transit (BRT). The county Department of Transportation (DOT) will complete the U529 BRT design in June 2018 and the Council on March 20, 2018 tentatively approved the FY19-24 Capital Improvement Program (CIP) funding for its construction, which would start in July 2018. Most of the cost will pay for platforms and vehicles. It is projected to be operational in 2020. In addition, the Council approved on March 6, 2018 a change in scope and funding to explore a BRT dedicated lane on US29 south of Tech Road (it is already in the design north to MD198). Furthermore the Council tentatively approved on March 20 the CIP funding for planning to select the preferred alternative to add BRT on New Hampshire Ave for the FY22-24 period and for the North Bethesda Transitway BRT for the FY23-24 period. The New Hampshire Ave BRT would directly provide service to FDA. Lastly, the council approved designing the Veirs Mill BRT for the FY 23-25 period. We have asked the council to also fund a study to add BRT on Randolph Road, but there doesn’t appear to be sufficient funds available this year to approve it. The Randolph Road BRT is expected to provide service from White Flint Metro Station (maybe Glenmont Metro Station initially) to Industrial Pkwy and FDA Blvd. A platform near that intersection will provide a second BRT service point for the FRC/FDA. The final FY19-24 CIP decisions will be made in May 2018.

LATIP. Montgomery County updated the Subdivision Staging Policy on November 2016 to make many major changes including adding the LATIP process for White Oak, the first such policy area where it is effective. DOT undertook a study of the WOSG MP area plus a mile or so outside of it to identify where road congestion would be expected once 100% of the development allowed under the WOSG master plan is developed. The DOT study and the traffic study undertaken for the Draft EIS were essentially the
Attachment 3

same except the EIS study provides more detail as it relates to the FRC. The DOT study identified a number of road improvements. To that, transit and bikeway projects were added. DOT also developed a budgetary cost to build each project. The Council then decided which projects to include in the LATIP and the budgetary cost for each. Next the Council took the $101M total cost of all the LATIP projects and divided it by the number of vehicle trips. The resulting $5010 is the amount developers must pay for each vehicle trip as part of their approved development, typically payable 12 months after a building permit has been issued.

The default approach for using the LATIP funds is for the council to approve projects as part of the CIP process. On March 20, the council tentatively approved a CIP project to start using the funds they expect to collect over the next six years.

As an alternative, the county process allows developers to make the improvements and receive a credit against the LATIP fee and/or transportation impact tax as appropriate. The three major developers other than GSA within the Wosg MP wish to make those improvements. County DOT must approve the improvements and where state roads are affected, State Highway Administration (SHA) must also approve.

Commercial projects are working through the county approval process that would create LATIP funds – a small amount in 2018 and more starting in 2020/2021. The Hilton Hotel in Hillendale is under construction. Both the Hillendale Gateway and Viva White Oak projects have completed the sketch plan, the first of the three steps before they can apply for a building permit. The second step is the subdivision plan and third step is a site plan. GLDC will be submitting the Viva White Oak preliminary plan in either March or April 2018 and expects approval this summer. Duffie Companies expects it will submit its preliminary plan for Hillendale Gateway in early summer 2018. Duffie has already developed a solution for the New Hampshire Ave at Powder Mill area. MCDOT supports that plan and has submitted it to SHA for approval.

Transportation Impact Tax. In addition to the LATIP fee, developers must also pay a Transportation Impact Tax. The credit process created by the Council for the LATIP also allows developers to build non LATIP transportation projects in the area and receive a credit against the impact tax. Most of the Draft EIS identified needed improvements are within the LATIP but some are not. BRT is not directly included in the LATIP. The transportation impact tax could be used to pay for some of these other improvements. Developers would only want to make transportation improvements at that point in time when they would need to pay the county, as if they were not going to build them. Thus the improvements will be phased in over time to match the build phasing, which will be driven by market demands.

External Integration with the FRC

BRT Platform on NH. We agree with the Draft EIS (Main EIS page 174 and Appendix G, Part 3, Page 6) that the GSA/FDA should work with Montgomery County to provide a connection to the New Hampshire Ave BRT. The thinking has been that a BRT platform will be included on the FRC either in the circle in front of Building 1 or at the proposed transit center. The BRT platform would be only slightly different than the existing bus platform in front of Building 1 – platform raised by about 6 inches and a small off-board fare collection machine added. In our discussions with the County, they support that idea. We envision that the New Hampshire BRT corridor could be operational in 2025-2026 timeframe. We expect that GSA/FDA will need use a phased implementation – before the transit center is build and after it is built.
Attachment 3

BRT on Industrial Pkwy near FDA Blvd. As indicated above, the Randolph Road BRT would include a platform in the area of the Industrial Parkway Extended/FDA Blvd Intersection. FDA should provide shuttles to that platform.

Shuttles. GSA/FDA should provide shuttles to the White Oak BRT platform on Lockwood Dr when the US29 corridor opens in 2020 as recommended in the Draft EIS. Since a number of FDA doctors are expected to practice medicine at the White Oak Medical Center, we recommend that FDA also provide a shuttle to it, which opens in mid-2019. Once the Randolph Road BRT corridor is built, we expect there will be a BRT platform at the hospital. Once GLDC extends Industrial Parkway, we recommend the hospital/BRT shuttle also stop at the Tech Road platform (on the US29 BRT). It is expected that over time, a number of FDA employees will live in Viva White Oak and that a number of companies that FDA regulates will have offices in Viva White Oak and travel from there to FDA from time to time for meetings. The hospital/Viva White Oak shuttle should provide service to the three BRT platforms (Tech Road, Viva White Oak and Hospital). These shuttles will reduce the number of vehicles driving onto the FRC and thus reduce the need for parking spaces.

Bikeways. The LATIP includes a number of bikeways in the area, especially within Viva White Oak and existing commercial area between it and US29. We encourage GSA to provide bikeways and secure bicycle parking on the FRC as recommended in the Draft EIS (Main EIS page 174 and Appendix G, Part 3, Page 6)

In summary:

- Don’t select the no-alternative because of the apparent impact on traffic. We recommend Alternative C with maximum building height of 10-12 levels.
- It is not correct to assume that no transportation implements will be implemented. The county has already approved several key improvements (BRT and roads in Viva White Oak). They have put the LATIP process in place to implement other improvements over time as development other than FRC proceeds.
- GSA/FDA should coordinate with the county as the EIS indicates concerning improvements
- GSA/FDA should provide shuttles to nearby key off sight destinations that would benefit their employees and reduce the need for parking.

Sincerely

Daniel L. Wilhelm, President GCCA
Attachment 1.

The functional class of some of the roads listed in EIS Table 18, Page 168, don't match what Montgomery County calls them. Local county roads are secondary or tertiary residential streets and traffic congestion is not addressed on these streets by the county. The following road category changes were taken from the White Oak Science Gateway Master Plan and Montgomery County Draft Master Plan of Highways and Transitways:

- Principal arterial to major road: New Hampshire Ave and Columbia Pike (US29)
- Minor Arterial to Arterial: Randolph and Cherry Hill Rd, Fairland Road, Powder Mill
- Local Road to Business Street: FDA Blvd, Broadbirch Dr, Plum Orchard Dr,
- Local Road to Arterial: Old Columbia Pike (west of US29), Prosperity Dr, Tech Rd, Industrial Pkwy
- Local Road to Minor Arterial: Calverton Blvd, Old Columbia Pike (east of US29)
- Major Collector to Arterial: Musgrove Road
- Other Local Roads to secondary or tertiary residential

In addition some of the posted speed limits are higher than shown in Table 18. Since capacity is a function of speed, the result will be a higher capacity and thus less congestion.

- Fairland Road: 40 mph west of US29 and 30 east of US29
- Randolph Road: 40 mph
- Cherry Hill Road: 40 mph in Montgomery County and 30 mph in Prince George's County
- Broadbirch Dr: 30 mph
Attachment 4

Alternative C: Two High-Rise Office Buildings
MEMORANDUM

TO: The Maryland-National Capital Park and Planning Commission

VIA: Andree Green Checkley, Planning Director
Debra Borden, Principal Counsel, Legal Office, M-NCPDC
Derick Berlage, Chief, Countywide Planning Division

FROM: Maria Ann Martin, Master Planner, Special Projects Section, Countywide Planning Division

SUBJECT: MR-1809F United States Food and Drug Administration (FDA) Federal Research Center (FRC) Draft Master Plan and Environmental Assessment

Attached for your review and approval is the Prince George’s County Planning Department staff comments on the United States Food and Drug Administration (FDA) Federal Research Center (FRC) draft Master Plan and Environmental Assessment.

Mandatory Referral case number MR-1809F was presented to the Prince George’s County Planning Board at its regularly scheduled Planning Board meeting on April 26, 2018. A copy of the staff report with staff recommendations is attached.

RECOMMENDATION

Staff recommends that the Full Commission approve the transmittal of the staff report.

Attachments:
Attachment 1 – Transmittal letter to U.S. General Services Administration
Attachment 2 – MR-1809F staff report
<table>
<thead>
<tr>
<th>Mandatory Referral</th>
<th>General Data</th>
<th>MR-1809F</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Application</strong></td>
<td><strong>General Data</strong></td>
<td><strong>MR-1809F</strong></td>
</tr>
<tr>
<td>Project Name: United States Food and Drug Administration (FDA) Federal Research Center (FRC) Master Plan and Environmental Assessment</td>
<td>Planning Board Hearing Date:</td>
<td>04/26/2018</td>
</tr>
<tr>
<td>Location: 40 acres in Hillandale area off Powder Mill Road of the Federal Research Center, 10903 New Hampshire Avenue, Silver Spring, Maryland</td>
<td>Date Accepted:</td>
<td>03/12/2018</td>
</tr>
<tr>
<td>Applicant/Address: United Stated General Services Administration 301 7th Street, SW, Suite 4004 Washington, DC 20407</td>
<td>Mandatory Action Timeframe:</td>
<td>60 Days</td>
</tr>
<tr>
<td>Property Owner: United States of America</td>
<td>Acreage:</td>
<td>40 acres</td>
</tr>
<tr>
<td>Planning Area:</td>
<td>Zone:</td>
<td>R-O-S</td>
</tr>
<tr>
<td>General Plan Designation:</td>
<td>Planning Area:</td>
<td>61</td>
</tr>
<tr>
<td>Established Communities</td>
<td>Council District:</td>
<td>1</td>
</tr>
<tr>
<td>N/A</td>
<td>Municipality:</td>
<td>N/A</td>
</tr>
<tr>
<td>200-Scale Base Map:</td>
<td>Notice Dates</td>
<td>Acceptance Mailing:</td>
</tr>
<tr>
<td>214NE03</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Purpose of Application**

The Food and Drug Administration (FDA) is planning to accommodate up to 18,000 total employees on the Federal Research Center (FRC) site in the White Oak community, with approximately 9,000 new employees moving to the campus between 2025 to 2035.

**Staff Recommendation**

Approval to transmit staff comments to the Full Commission

**Staff Reviewer:** Maria Martin, Master Planner

Phone Number: 301-952-3472

E-mail: maria.martin@ppd.mncppc.org
MR-1809F Staff Report – United States Food and Drug Administration Federal Research Center Master Plan and Environmental Assessment

PROJECT BACKGROUND
The Land Use Article §§20-301 through 305 of the Maryland Annotated Code requires the Planning Board to review public construction projects for all federal, state, county and municipal governments, and publicly and privately-owned utilities through the Mandatory Referral (MR) review process. This project is being reviewed as part of the MR review process pursuant to the Maryland Annotated Code, and Section 27-294 of the Prince George’s County Zoning Ordinance.

PROJECT SUMMARY
The U.S. General Services Administration (GSA) is currently consolidating the U.S. Food and Drug Administration (FDA) headquarters facilities at the Federal Research Center at White Oak (FRC) in Silver Spring, Maryland. The FDA headquarters currently encompasses a 130-acre piece of the FRC, also known as the FDA Campus, located at the west end of the FRC. Due to new Congressional mandates, FDA is projecting an increase in employees and campus support staff at the FDA Campus. The overall proposed draft master plan for the 130-acre FDA Campus is intended to:

- Consolidate the FDA headquarters;
- Develop an additional 1,100,000 to 1,200,000 GSF of office space and 300,000 to 400,000 GSF of special use space;
- Increase visitor parking by 615 parking spaces to a total of 1,615 spaces;
- Reconfigure the East Loop Road; and
- Implement a bus-rapid transit system.

Currently the FDA has 10,987 assigned personnel to the FDA Campus with a peak daily population of 7,793. The current projected growth for FDA at FRC is approximately 7,018 additional employees and support staff, which includes funded staff vacancies, existing employees currently in leased space in Montgomery and Prince George’s counties, FDA support staff, and future growth projected by 2022.

Approximately 40 acres of the FRC lies within Prince George’s County. The proposed development will occur around the existing development in Montgomery County.

STAFF RECOMMENDATIONS
After reviewing the environmental assessment and the draft master plan, the Prince George’s County Planning Department staff has the following comments:

- Within Prince George’s County, the FRC includes a piece of land that is best described as a pipestem connecting the intersection of MD 212 and Cherry Hill Road to the main part of the FRC. That pipestem contains a roadway known as Coffman Road. Given that this roadway connection would introduce complexity to the MD 212/Cherry Hill intersection and pass next to developed residential properties, it has been understood that access by means of Coffman Road is very restricted. However, several maps in the master plan appear to display Coffman Road with the same degree of importance as FDA Boulevard, which is a newer connection to Cherry Hill Road wholly within Montgomery County. See the attached transportation memorandum for the
graphic that shows a portion of Figure 1-17 from the master plan, and with Coffman Road highlighted. It is requested that Figures 1-17 and 1-19 in the master plan be revised to show Coffman Road within Prince George's County as a dashed line or some similar convention to convey the restricted use nature of the roadway.

- Nearly every plan within the master plan shows a "potential access road" starting at a traffic circle along the Southwest Loop Road in the vicinity of what is now known as Bowditch Road. The plan needs to indicate where this access road will go, and what the potential alignment of this road would be.

- If new construction is proposed in the eastern portion of the FDA Campus, historic resource PG:61-045, Aurora Pulled Radiation Simulator and M:33-025, Naval Ordnance Laboratory Survey District could be impacted. Any new construction should consider visual impacts on the Naval Ordnance Laboratory Survey District (M:33-025).

- If new construction is proposed in the eastern portion of the FDA Campus, impacts to archaeological site 18PR466, the Shadrack Beall Farmstead, should be considered. Archaeological site 18PR466 meets the criteria for listing in the National Register of Historic Places. The site should be preserved in place and avoided by new construction. If the archeological site cannot be avoided, Phase III archeological mitigation is recommended.

- Building massing and spatial pattern- The existing FDA campus has been developed under four different master plans and established a unique site layout that features a central green open space surrounded by a series of human-scaled open courtyard spaces enclosed by midrise buildings. The open courtyards further complement the central green. Various buildings of different building techniques and finish materials from different time periods provide visual interest surrounding the open courtyards. This unique open space/courtyard pattern should be preserved in the new master plan for future expansion to maintain the integrity, continuity and strong spatial eligibility of the FDA campus

- Viewshed- The existing FDA campus is part of the historic resources of the White Oak Naval Ordnance Laboratory Historic District. The prominent features of the primary viewshed from New Hampshire Avenue to the campus are the existing Main Administration Building and the flagpole. The development alternative that continues the building massing and clustering of the existing campus will not only preserve the organic pattern of the FDA campus, but also preserve this historic vista from New Hampshire Avenue.

- On-site circulation- Pedestrian circulation needs to be strengthened within the proposed master plan by eliminating gaps in the existing network and by providing wider sidewalks that can accommodate bicycling. The master plan proposes 10-foot wide sidewalks only for the new loop streets. Ten-foot-wide sidewalks should be implemented in phases throughout the entire campus. Vehicular circulation is building on the existing roadways and oriented toward New Hampshire Avenue. An additional access road- FDA Boulevard off Cherry Hill Road is a good addition to improve the accessibility of the FRC campus. The master plan also includes construction of a new distribution center and truck screening facility and shows two possible locations—one is located along New Hampshire Avenue and the other is located in the northeast section of the site off FDA Boulevard. The Urban Design Section supports the location off FDA Boulevard because this location will separate truck traffic from the employee traffic and help evenly distribute trips to the larger campus. In addition, this location is very close to the Interstate Highway System, where the intersection of I-95 and Beltway I-495 is located.
- Native Species-The Federal Government is a leader in sustainable development. The additional buildings on the campus will achieve LEED Gold certification. The master plan also provides some general design guidelines for future landscaping on the campus. The Urban Design Section suggests that in addition to the proposed landscaping design guidelines, all landscaping materials should be native species and all herbaceous planting materials should be pollinator friendly species.

PROJECT LOCATION, DESCRIPTION, AND SCHEDULE

Location/Description:

The Federal Research Center (FRC) at White Oak is located at 10903 New Hampshire Avenue, Silver Spring, Maryland. The FRC is located east of New Hampshire Avenue (MD 650) and west of Cherry Hill Road in Montgomery and Prince George's counties. The site is bounded to the north by commercial and residential properties, the Paint Branch Stream Valley Park, and the Percontee Quarry.

To the south of the FRC lie the U.S. Army's Adelphi Laboratory, residential properties, and the Powder Mill Community Park.

Approximately 40 acres of the FRC lies within Prince George's County and is zoned R-O-S (Reserved Open Space).
Project Schedule Overview:

The development of the draft master plan was supported by three major project components:

- The Land Use Feasibility Study (LUFS) was completed in the Spring of 2017 and put forward a series of development options and identified related costs for the FRC site to accommodate additional FDA staff.

- The National Environmental Policy Act (NEPA) compliance Public Scoping Period occurred in the Summer and Fall of 2017. At this same time, technical studies were conducted that informed a Draft Environmental Impact Statement (EIS) issued in March 2018.

- The National Historic Preservation Act (NHPA) compliance process has been tracking concurrently with the NEPA compliance process to identify, assess and resolve adverse effects to historic structures or landscapes. A Programmatic Agreement (PA) with appropriate state entities and other Consulting Parties will be completed in advance of the Final Master Plan.

Below is the work schedule that the GSA staff has developed for the project approval.

<table>
<thead>
<tr>
<th>Date</th>
<th>Activity Events</th>
</tr>
</thead>
<tbody>
<tr>
<td>May 11, 2018</td>
<td>Referral comments due for the Draft Master Plan &amp; Draft Transportation Management Plan (TMP)</td>
</tr>
<tr>
<td>May 16, 2018</td>
<td>MNCPPC Full Commission Meeting on the Draft Master Plan &amp; Draft TMP</td>
</tr>
<tr>
<td>Date</td>
<td>Event Description</td>
</tr>
<tr>
<td>--------------------</td>
<td>-----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>May 22, 2018</td>
<td>Montgomery and Prince George's Counties' referral letters due to U.S. GSA</td>
</tr>
<tr>
<td>May 23, 2018</td>
<td>Montgomery and Prince George's Counties' referral letters due to National Capital Planning Commission (NCPC)</td>
</tr>
<tr>
<td>June 7, 2018</td>
<td>NCPC Commission meeting on the Draft Master Plan &amp; Draft TMP</td>
</tr>
<tr>
<td>July 20 through August 19, 2018</td>
<td>Public comment period for the Final Environmental Impact Statement (FEIS) Counties may provide comments.</td>
</tr>
<tr>
<td>TBD</td>
<td>Montgomery and Prince George's Counties' referral letters due to Final Master Plan &amp; Draft TMP</td>
</tr>
<tr>
<td>September 28, 2018</td>
<td>Final Master Plan submitted to NCPC</td>
</tr>
<tr>
<td>TBD</td>
<td>Montgomery and Prince George's Counties Planning Board meeting on Final Master Plan &amp; Draft TMP</td>
</tr>
<tr>
<td>November 1, 2018</td>
<td>NCPC Commission meeting on the Final Master Plan &amp; Draft TMP</td>
</tr>
</tbody>
</table>

**ANALYSIS OF PROJECT IMPACT AREAS**

The Maryland-National Capital Park and Planning Commission, Prince George's County Planning Department, staff has reviewed the proposed project and provided the following comments:

**1. ENVIRONMENTAL ASSESSMENT**

After an evaluation of the site plan submitted by the applicant, the Environmental Planning Section has determined that because this is a federally owned and operated property, the project is not subject to the Prince George's County's Woodland and Wildlife Habitat Conservation Ordinance or local building and grading regulations. Nor does M-NCPDC have regulatory jurisdiction over activities, development or otherwise. The following information is provided for the benefit of the applicant.

The narrative indicates that adverse impacts to the regulated environmental features on-site and off-site during clearing, grading, and road and building construction, will be minimized by utilizing Best Management Practices (BMP) such as silt fence, erosion matting, inlet protection, sediment traps, sediment basins and revegetation of exposed sediment. The statement also indicates that stormwater management plans and erosion and sediment control plans will be prepared and submitted to the Maryland Department of the Environment (MDE) for review and approval prior to construction. Temporary impacts to streams and wetlands will be restored to pre-construction conditions to the maximum extent practicable, following construction. Additionally, GSA will obtain authorization under the Maryland State Programmatic General Permit 5 (MDSPGP-5), by the US Army Corps of Engineers and provide compensatory mitigation at a minimum of 1:1 ratio for stream impacts exceeding 200 linear feet.

Long term impacts are proposed to be minimized by implementing mitigation, reduction, and elimination, as necessary. The plan states that M-NCPDC will be consulted prior to final design to determine appropriate compensatory mitigation for impacts to the stream valley buffers. Increases in impervious coverage will be mitigated through the implementation of environmental site design/low impact design (ESD/LID) strategies including bioretention, bioswales along roadsides, rooftop rainwater harvesting, green roofs, pervious pavement, tree planting and stream restoration efforts. All remaining stormwater volume is proposed to be directed to structural BMPs such as stormwater management ponds.

**2. TRANSPORTATION ASSESSMENT**

1. Within Prince George's County, the FRC includes a piece of land that is best described as a pipestem connecting the intersection of MD 212 and Cherry Hill Road to the main part of the FRC. That pipestem contains a roadway known as Coffman Road. Given that this roadway
connection would introduce complexity to the MD 212/Cherry Hill intersection and pass next to
developed residential properties, it has been understood that access by means of Coffman Road is
very restricted. However, several maps in the master plan appear to display Coffman Road with
the same degree of importance as FDA Boulevard, which is a newer connection to Cherry Hill
Road wholly within Montgomery County. See the attached transportation memorandum for the
graphic that shows a portion of Figure 1-17 from the master plan, and with Coffman Road
highlighted. It is requested that Figures 1-17 and 1-19 in the master plan be revised to show
Coffman Road within Prince George's County as a dashed line or some similar convention to
convey the restricted use nature of the roadway.

2. Nearly every plan within the master plan shows a "potential access road" starting at a traffic circle
along the Southwest Loop Road in the vicinity of what is now known as Bowditch Road. The
plan needs to indicate where this access road will go, and what the potential alignment of this
road would be.

3. HISTORIC PRESERVATION/ARCHEOLOGY

Historic Preservation

Findings: The eastern portions of the FRC campus (areas 300, 500, 600, and 700) are characterized by the
former explosives research area of the Naval Ordnance Laboratory. Most of the facilities have been
removed or demolished since the closure of the Laboratory in 1997. Some facilities continue to exist in a
decaying state.

Recorded historic resources within the Prince George's County section of the FDA campus include
PG:61-045, Aurora Pulsed Radiation Simulator and M:33-025, Naval Ordnance Laboratory Survey
District, the eastern portion of which lies in Prince George's County.

Conclusions: If new construction is proposed in the eastern portion of the FDA Campus, PG:61-045,
Aurora Pulsed Radiation Simulator and M:33-025, Naval Ordnance Laboratory Survey District could be
impacted. Any new construction should consider visual impacts on the Naval Ordnance Laboratory
Survey District (M:33-025).

Archeology

Findings: The property is located within the Atlantic Coastal Plain, a relatively flat topographical region.
The Paint Branch and West Branch stream valleys are in the eastern part of the property. The FDA
campus has been surveyed for archeological resources.

Five archeological sites have been recorded in the Prince George's County portion of the FDA Campus.
Site 18PR436 is an early twentieth century house foundation. Site 18PR437 is also an early twentieth
century house foundation. Site 18PR438 is a prehistoric lithic scatter. Site 18PR465 is Late Archaic short-
term camp or base camp and lithic quarry/extraction site. Site 18PR466 was identified as the Shadrack
Beall Farmstead, an eighteenth- to twentieth-century farm site. Site 18PR466 was the only site that was
determined to be eligible for listing in the National Register of Historic Places.

Conclusions: If new construction is proposed in the eastern portion of the FDA Campus, impacts to
archeological site 18PR466, the Shadrack Beall Farmstead, should be considered. Archeological site
18PR466 meets the criteria for listing in the National Register of Historic Places. The site should be
preserved in place and avoided by new construction. If the archeological site cannot be avoided, Phase III
archeological mitigation is recommended.
4. CONSISTENCY WITH DEVELOPMENT/REGULATORY STANDARDS

The Urban Design Section offers the following observations relating to the Master Plan as proposed within Montgomery County. The Master Plan proposes three development alternatives, adjacent to the existing FDA campus with a combination of various types of architecture. The general proposed campus layout is compact development that grows organically out of the existing FDA campus. Given the size of the existing FRC campus of 660 acres, integration with the surrounding community is not occurring because the site is isolated. In addition, the Urban Design Section has suggestions regarding building massing, viewed, on-site circulation, and planting materials.

- **Buildings and spatial pattern:** The existing FDA campus has been developed under four different master plans and established a unique site layout that features a central green open space surrounded by a series of human-scaled open courtyard spaces enclosed by midrise buildings. The open courtyards further complement the central green. Various buildings of different building techniques and finish materials from different time periods provide visual interest surrounding the open courtyards. This unique open space/courtyard pattern should be preserved in the new master plan for future expansion to maintain the integrity, continuity and strong spatial eligibility of the FDA campus.

- **Viewshed:** The existing FDA campus is part of the historic resources of the White Oak Naval Ordnance Laboratory Historic District. The prominent features of the primary viewed from New Hampshire Avenue to the campus are the existing Main Administration Building and the flagpole. The development alternative that continues the building massing and clustering of the existing campus will not only preserve the organic pattern of the FDA campus, but also preserve this historic vista from New Hampshire Avenue.

- **On-site circulation:** Pedestrian circulation needs to be strengthened within the proposed master plan by eliminating gaps in the existing network and by providing wider sidewalks that can accommodate bicycling. The master plan proposes 10-foot wide sidewalks only for the new loop streets. Ten-foot-wide sidewalks should be implemented in phases throughout the entire campus. Vehicular circulation is building on the existing roadways and oriented toward New Hampshire Avenue. An additional access road—FDA Boulevard off Cherry Hill Road is a good addition to improve the accessibility of the FRC campus. The master plan also includes construction of a new distribution center and truck screening facility and shows two possible locations—one is located along New Hampshire Avenue and the other is located in the northeast section of the site off FDA Boulevard. The Urban Design Section supports the location off FDA Boulevard because this location will separate truck traffic from the employee traffic and help evenly distribute trips to the larger campus. In addition, this location is very close to the Interstate Highway System, where the intersection of I-95 and Beltway I-495 is located.

- **Native Species:** The Federal Government is a leader in sustainable development. The additional buildings on the campus will achieve LEED Gold certification. The master plan also provides some general design guidelines for future landscaping on the campus. The Urban Design Section suggests that in addition to the proposed landscaping design guidelines, all landscaping materials should be native species and all herbaceous plating materials should be pollinator friendly species.

5. CONSISTENCY WITH APPROVED PLANS

In the 2010 Approved Subregion I Master Plan and Sectional Map Amendment, the subject property is designated as an Institutional land use.
In the 2014 Plan Prince George's 2035 Approved General Plan, the subject property is located inside the boundaries of the Established Communities.

6. EXISTING PUBLIC FACILITIES

The proposed project is in Police District VI station, which is located at 6707 Groveton Drive in Clinton.

The property is served by Beltsville Fire/EMS Station 841 which is located at 4321 Sellman Road, Beltsville.

The 2008 Approved Water and Sewer Plan places this property in Water and Sewer Categories 5, Future Community System.

7. COMMUNITY OUTREACH

Planning Department: On April 17, 2018, notification letters were mailed to adjoining property owners and area civic association.

The Applicant: GSA issued a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) on August 18, 2017. The letters included information on the public scoping meeting and asked for the public's comments on the proposed FDA Master Plan. The NOI was published in the Federal Register, as well as The Washington Post, the Montgomery Sentinel, and the Prince George's Sentinel. NOI letters were mailed to approximately 125 federal, state, and local agencies, public officials, community groups, special interest groups, and area residents.

GSA held a public scoping period on the EIS/Master Plan from August 21, 2017 through September 25, 2017. GSA also held an Open House for the public on September 12, 2017 from 6:30 to 8:30 pm. Approximately 50 people attended the public meeting, including FDA employees and staff from the following offices:

- Senator Van Hollen and Congressman Sarbanes' offices,
- Montgomery and Prince George's County Councils,
- Maryland Department of Commerce,
- Montgomery and Prince George's County governments,
- Prince George's County Police Department, and,
- Maryland Park Police.

In addition, several organizations (Strengthen FDA, LabQuest, North White Oak Civic Association, Perconte, Inc., Eyes of Paint Branch, Greater Colesville Civic Association, Whitehall Square Homeowner's Association, and the Alliance for a Stronger FDA) and members of the local communities were in attendance.

Poster boards were displayed showing the site plan; a history of the FDA consolidation; the Environmental Impact Statement (EIS) and National Historic Preservation Act (NHPA) processes; the Area of Potential Effect (APE); preliminary Master Plan alternatives; and environmental features. In addition, a continuously running slide presentation was shown. The public was invited to comment on the proposed project and twenty-four comments were received from organizations, government agencies, and individuals.
MEMORANDUM

TO: Maria Martin, Special Projects Section, Countywide Planning Division
FROM: Masog, Transportation Planning Section, Countywide Planning Division

SUBJECT: 2018 FDA Federal Research Center Master Plan and Draft Environmental Impact Statement

The Transportation Planning Section has reviewed the items referenced above. The U.S. General Services Administration (GSA) is currently consolidating the US Food and Drug Administration (FDA) headquarters facilities at the Federal Research Center at White Oak (FRC) in Silver Spring, Maryland. The FDA headquarters currently encompass a 130-acre piece of the FRC, now known as the FDA Campus. The Master Plan's purpose is to plan for future growth to further consolidate FDA operations. The Master Plan will provide a framework for development at the FRC to accommodate another 7,018 FDA employees and support staff on site for a total population of 18,000 FDA employees and support staff.

Review Comments
The overall FRC is 662 acres, with the majority of the site within Montgomery County and about 40 acres within Prince George's County. The proposed master plan affects the 130-acre site of the FDA Headquarters which is entirely within Montgomery County. As such, our comments are very limited, and highlight a couple of key items:

1. Within Prince George's County, the FRC includes a piece of land that is best described as a pipestem connecting the intersection of MD 212 and Cherry Hill Road to the main part of the FRC. That pipestem contains a roadway known as Coffman Road. Given that this roadway connection would introduce complexity to the MD 212/Cherry Hill intersection and pass next to developed residential properties, it has been understood that access by means of Coffman Road is very restricted. However, several maps in the master plan appear to display Coffman Road with the same degree of importance as FDA Boulevard, which is a newer connection to Cherry Hill Road wholly within Montgomery County. See below, which is a portion of Figure 1-17 from the master plan, and with Coffman Road highlighted. It is requested that Figures 1-17 and 1-19 in the master plan be revised to show Coffman Road within Prince George's County as a dashed line or some similar convention to convey the restricted use nature of the roadway.
2. Nearly every plan within the master plan shows a “potential access road” starting at a traffic circle along the Southwest Loop Road in the vicinity of what is now known as Bowditch Road. The plan needs to indicate where this access road will go, and what the potential alignment of this road would be.
April 2, 2018

MEMORANDUM

TO: Maria Martin, Supervisor
    Special Projects Section
    Countywide Planning Division

FROM: Howard Berger, Supervisor
      Jennifer Stabler, Archeology Planner Coordinator
      Historic Preservation Section
      Countywide Planning Division

SUBJECT: 2018 FDA Federal Research Center Master Plan

Background

The Federal Research Center (FRC) at White Oak is located at 10903 New Hampshire Avenue in Silver Spring, Maryland. The campus is located east of New Hampshire Avenue (MD 650) and west of Cherry Hill Road in Montgomery and Prince George’s counties. Approximately 40 acres of the FRC lies within Prince George’s County Planning Area 61. The portion of the FRC that is located within Prince George’s County is surrounded by residential development. The portion of the campus located within Prince George’s County is zoned R-O-S (Reserved Open Space).

The U.S. General Services Administration (GSA) is currently consolidating the U.S. Food and Drug Administration (FDA) headquarters facilities at the Federal Research Center at White Oak in Silver Spring, Maryland. Due to new Congressional mandates, FDA is projecting an increase in employees and campus support staff at the FDA Campus. The master plan will provide a framework for development at the FRC to accommodate another 7,018 FDA employees and support staff for a total population of 18,000 FDA employees and support staff.

The implementation of the Master Plan for FDA is to include the following:

- Development of an additional 1,100,000 to 1,200,000 GSF of office space and 300,000 to 400,000 GSF of special use space to support FDA’s mission;
- A total of 11,709 parking spaces for FDA employees and campus support staff;
- Increasing visitor parking from 1,000 to 1,615 parking spaces;
- Reconfiguring the East Loop Road to allow for ease of access into and out of the FDA Campus.

Findings

Historic Preservation

The eastern portions of the FRC campus (areas 300, 500, 600, and 700) are characterized by the former explosives research area of the Naval Ordnance Laboratory. Most of the facilities have been removed or demolished since the closure of the Laboratory in 1997. Some facilities continued to exist in a decaying state.
Recorded resources within the Prince George's County section of the FDA campus include PG:61-045, Aurora Pulsed Radiation Simulator and M:33-025, Naval Ordnance Laboratory Survey District, the eastern portion of which lies in Prince George's County.

Archeology

The property is located within the Atlantic Coastal Plain, a relatively flat topographical region. The Paint Branch and West Branch stream valleys are in the eastern part of the property. The FDA campus has been surveyed for archeological resources.

Five archeological sites have been recorded in the Prince George's County portion of the FDA Campus. Site 18PR436 is an early twentieth century house foundation. Site 18PR437 is also an early twentieth century house foundation. Site 18PR438 is a prehistoric lithic scatter. Site 18PR465 is Late Archaic short-term camp or base camp and lithic quarry/extraction site. Site 18PR466 was identified as the Shadrack Beall Farmstead, an eighteenth- to twentieth-century farm site. Site 18PR466 was the only site that was determined to be eligible for listing in the National Register of Historic Places.

Conclusions

Historic Preservation

If new construction is proposed in the eastern portion of the FDA Campus, PG:61-045, Aurora Pulsed Radiation Simulator and M:33-025, Naval Ordnance Laboratory Survey District could be impacted. Any new construction should consider visual impacts on the Naval Ordnance Laboratory Survey District (M:33-025).

Archeology

If new construction is proposed in the eastern portion of the FDA Campus, impacts to archeological site 18PR466, the Shadrack Beall Farmstead, should be considered. Archeological site 18PR466 meets the criteria for listing in the National Register of Historic Places. The site should be preserved in place and avoided by new construction. If the archeological site cannot be avoided, Phase III archeological mitigation is recommended.
MEMORANDUM

TO: Maria Martin, Supervisor, Special Project Section
VIA: Susan Lareuse, Master Planner, Urban Design Section
FROM: Henry Zhang, Master Planner, Urban Design Section
SUBJECT: 2018 FDA Federal Research Center Master Plan

The Urban Design Section has reviewed the U.S. Food and Drug Administration (FDA) Federal Research Center (FRC) Master Plan. This Master Plan provides for the consolidation of the FDA headquarters campus at the Federal Research Center at White Oak to accommodate the anticipated workforce of 18,000 employees and support staff. The FRC campus covers approximately 660 acres of land (previously used as Naval Ordnance Laboratory) and is generally rectangular in shape. Its address is 10903 New Hampshire Avenue, on the east side of New Hampshire Avenue and west of Cherry Hill Road, and spans both Montgomery and Prince George’s County. The 130-acre portion of FRC fronting Hampshire is developed with FDA headquarters facilities. The 2018 Master Plan proposes a number of alternatives that are adjacent to the existing FDA campus and west of both the Paint Branch and the West Branch, streams that bisect the middle of the site. The most recent improvement for the development is the roadway of FDA Boulevard, located within Montgomery County. The existing Coffman Road, located off of Cherry Hill Road within Prince George’s County, is closed and will remain so in the Master Plan. There are 40 acres of the FRC in Prince George’s County that is located within a broader triangular area created by the County Line, Cherry Hill Road (C-201) and Powder Mill Road (C-112). Both roadways are designated as “Collector” roadways in the County’s 2009 Approved Master Plan of Transportation. The portion of the campus in Prince George’s County is surrounded by properties in the R-18 Zone with multifamily development, in the R-80, R-R Zones with single-family detached homes, and in the R-O-S Zone as open space. The 2010 Approved Subregion I Master Plan and Sectional Map Amendment identified four focus areas, none of which includes the FRC campus. The proposed 2018 FDA Master Plan focuses on the existing site of the FDA campus, fronting New Hampshire Avenue. No new improvements are proposed on the 40-acre portion of the FRC, therefore the 2018 Master Plan will have little to no impact in Prince George’s County.

The Urban Design Section offers the following observations relating to the Master Plan as proposed within Montgomery County. The Master Plan proposes three development alternatives, adjacent to the existing FDA campus with a combination of various of types of architecture. The general proposed
campus layout is compact development that grows organically out of the existing FDA campus. Given the size of the existing FRC campus of 660 acres, integration with the surrounding community is not occurring because the site is isolated. In addition, the Urban Design Section has suggestions regarding building massing, viewed, on-site circulation, and planting materials.

- **Buildings and spatial pattern** - The existing FDA campus has been developed under four different master plans and established a unique site layout that features a central green open space surrounded by a series of human-scaled open courtyard spaces enclosed by midrise buildings. The open courtyards further complement the central green. Various buildings of different building techniques and finish materials from different time periods provide visual interest surrounding the open courtyards. This unique open space/courtyard pattern should be preserved in the new master plan for future expansion to maintain the integrity, continuity, and strong spatial eligibility of the FDA campus.

- **Viewshed** - The existing FDA campus is part of the historic resources of the White Oak Naval Ordnance Laboratory Historic District. The prominent features of the primary viewshed from New Hampshire Avenue to the campus are the existing Main Administration Building and the flagpoles. The development alternative that continues the building massing and clustering of the existing campus will not only preserve the organic pattern of the FDA campus, but also preserve this historic vista from New Hampshire Avenue.

- **On-site circulation** - Pedestrian circulation needs to be strengthened within the proposed master plan by eliminating gaps in the existing network and by providing wider sidewalks that can accommodate bicycling. The master plan proposes 10-foot wide sidewalks only for the new loop streets. Ten-foot-wide sidewalks should be implemented in phases throughout the entire campus. Vehicular circulation is building on the existing roadways and oriented toward New Hampshire Avenue. An additional access road - FDA Boulevard off Cherry Hill Road is a good addition to improve the accessibility of the FRC campus. The master plan also includes construction of a new distribution center and truck screening facility and shows two possible locations - one is located along New Hampshire Avenue and the other is located in the northeast section of the site off FDA Boulevard. The Urban Design Section supports the location off FDA Boulevard because this location will separate truck traffic from the employee traffic and help evenly distribute trips to the larger campus. In addition, this location is very close to the Interstate Highway System, where the intersection of I-95 and Beltway I-495 is located.

- **Native Species** - The Federal Government is the leader of the sustainable development. The additional buildings on the campus will achieve LEED Gold certification. The master plan also provides some general design guidelines for future landscaping on the campus. The Urban Design Section suggests that in addition to the proposed landscaping design guidelines, all landscaping materials should be native species and all herbaceous planting materials should be pollinator friendly species.
TO: Maria Martin, Special Projects Section, Countywide Planning Division

FROM: Thomas Burke, Senior Planner, Environmental Planning Section

SUBJECT: 2018 FDA Federal Research Center Master Plan and Draft Environmental Impact Statement

The Environmental Planning Section has completed the review of the subject master plan and environmental impact statement. The site, known as the US Food and Drug Administration (FDA) headquarters at the Federal Research Center at White Oak (FRC), in Silver Spring. The 130-acre section known as the FDA Campus resides within the 662-acre FRC Property. The majority of the property is located within Montgomery County with approximately 40 acres within Prince George’s County. Although each of the alternatives discussed in the master plan are located outside of Prince George’s County, the entire site is located within the Paint Branch watershed, ultimately flowing to the Anacostia River. Therefore, all drainage from this site ultimately flows through Prince George’s County.

After an evaluation of the site plan submitted by the applicant, the Environmental Planning Section has determined that because this is a federally owned and operated property, the project is not subject to Prince George’s County’s Woodland and Wildlife Habitat Conservation Ordinance or local building and grading regulations. Nor does M-NCPPC have regulatory jurisdiction over activities, development or otherwise. The following information is provided for the benefit of the applicant.

The narrative indicates that adverse impacts to the regulated environmental features on-site and off-site during clearing, grading, and road and building construction, will be minimized by utilizing Best Management Practices (BMP) such as silt fence, erosion matting, inlet protection, sediment traps, sediment basins and revegetation of exposed sediment. The statement also indicates that stormwater management plans and erosion and sediment control plans will be prepared and submitted to the Maryland Department of the Environment (MDE) for review and approval prior to construction. Temporary impacts to streams and wetlands will be restored to pre-construction conditions to the maximum extent practicable, following construction. Additionally, GSA will obtain authorization under the Maryland State Programmatic General Permit 5 (MDSFGP-5), by the US Army Corps of Engineers and provide compensatory mitigation at a minimum of 1:1 ratio for stream impacts exceeding 200 linear feet.

Long term impacts are proposed to be minimized by implementing mitigation, reduction, and elimination, as necessary. The plan states that M-NCPPC will be consulted prior to final design to determine appropriate compensatory mitigation for impacts to the stream valley buffers. Increases in impervious coverage will be mitigated through the implementation of environmental site design/low impact design (ESD/LID) strategies including bioretention, bioswales along road sides, rooftop rainwater harvesting, green roofs, pervious pavement, tree planting and stream restoration efforts. All remaining stormwater volume is proposed to be directed to structural BMPs such as stormwater management ponds.

Thank you for the opportunity to review this project. If you have questions regarding the information presented, please contact the Environmental Planning Section at 301-952-3650.
MEMORANDUM

TO: Maria Martin, Supervisor, Countywide Planning Division

FROM: Jay Mangalvedhe, Senior Planner, Countywide Planning Division


Project Description
The Federal Drug Administration (FDA) is planning to accommodate up to 18,000 total employees on the Federal Research Center (FRC) site in the White Oak community, with approximately 9,000 new employees moving to the campus between 2025 to 2035. Currently the site has 7,793 employees. 300 acres of the Federal Research Center (FRC) is in Montgomery County and approximately 40 acres are in Prince George’s County.

The proposed site is in Council District 1 and is inside the Established Communities boundary as classified in the 2014 Plan Prince George’s 2035 Approved General Plan.

Evaluation of Existing Public Facilities
The proposed project is in Police District VI station, which is located at 6707 Groveton Drive in Clinton.

The property is served by Beltsville Fire/EMS Station 841 which is located at 4321 Sellman Road, Beltsville.

The 2008 Approved Water and Sewer Plan, places this property in Water and Sewer Categories 5, Future Community System.
Attachment 1

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION
Office of the Planning Director
Prince George's County Planning Department
14741 Governor Oden Bowie Drive
Upper Marlboro, Maryland 20772
www.mncppc.org/pgco
301-952-3595

April 4, 2018

Mr. Troy LeFewich
Senior Planner, Area 2 Planning Division
Montgomery County Planning Department
8787 Georgia Avenue
Silver Spring, MD 20910

RE: U.S. Food and Drug Administration
Environmental Impact Statement

Dear Mr. LeFewich:

The Prince George's County Planning Department appreciates the opportunity to review and provide comments to the Montgomery County Planning Department for their mandatory referral review of the Environmental Impact Statement for the proposed 2018 U.S. Food and Drug Administration (FDA) Federal Research Center (FRC) master plan on the White Oak campus in Silver Spring, Maryland. A small portion of the site is located in Prince George's County off Powder Mill Road. The overall master plan for the 130-acre FDA is intended to:

- Consolidate the FDA headquarters;
- Develop an additional 1,100,000 to 1,200,000 GSF of office space and 300,000 to 400,000 GSF of special use space;
- Increase visitor parking by 615 parking spaces to a total of 1,615 spaces;
- Reconfigure the East Loop Road; and
- Implement a bus-rapid transit system.

After reviewing the EIS and the master plan, the Prince George's County Planning Department staff has the following comments:

- Within Prince George's County, the FRC includes a piece of land that is best described as a pipsystem connecting the intersection of MD 212 and Cherry Hill Road to the main part of the FRC. That pipsystem contains a roadway known as Coffman Road. Given that this roadway connection would introduce complexity to the MD 212/Cherry Hill intersection and pass next to developed residential properties, it has been understood that access by means of Coffman Road is very restricted. However, several maps in the master plan appear to display Coffman Road with the same degree of importance as FDA Boulevard, which is a newer connection to Cherry Hill Road wholly within Montgomery County. See the attached transportation memorandum for the graphic that shows a portion of Figure 1-17 from the master plan, and with Coffman Road highlighted. It is requested that Figures 1-17 and 1-19 in the master plan be revised to show Coffman Road within Prince George's County as a dashed line or some similar convention to convey the restricted use nature of the roadway.

- Nearly every plan within the master plan shows a "potential access road" starting at a traffic circle along the Southwest Loop Road in the vicinity of what is now known as Bowditch Road. The plan needs to indicate where this access road will go, and what the potential alignment of this road would be.
Attachment 1

Mr. Troy Leftwich
Page 2
April 4, 2018

The Historic Preservation Section has the following comments regarding historic preservation and archaeology for the site:

- **Historic Preservation Findings** - The eastern portions of the FRC campus (areas 300, 500, 600, and 700) are characterized by the former explosives research area of the Naval Ordnance Laboratory. Most of the facilities have been removed or demolished since the closure of the Laboratory in 1997. Some facilities continued to exist in a decaying state.

Recorded resources within the Prince George's County section of the FDA campus include PG:61-045, Aurora Pulsed Radiation Simulator and M:33-025, Naval Ordnance Laboratory Survey District, the eastern portion of which lies in Prince George's County.

- **Historic Preservation Conclusions** - If new construction is proposed in the eastern portion of the FDA Campus, PG:61-045, Aurora Pulsed Radiation Simulator and M:33-025, Naval Ordnance Laboratory Survey District could be impacted. Any new construction should consider visual impacts on the Naval Ordnance Laboratory Survey District (M:33-025).

- **Archeology Findings** - The property is located within the Atlantic Coastal Plain, a relatively flat topographical region. The Potomac Branch and West Branch stream valleys are in the eastern part of the property. The FDA campus has been surveyed for archeological resources.

Five archeological sites have been recorded in the Prince George's County portion of the FDA Campus. Site 18PR436 is an early twentieth century house foundation. Site 18PR437 is also an early twentieth century house foundation. Site 18PR438 is a prehistoric lithic scatter. Site 18PR465 is Late Archaic short-term camp or base camp and lithic quarry/extraction site. Site 18PR466 was identified as the Shadrack Beall Farmstead, an eighteenth- to nineteenth-century farm site. Site 18PR466 was the only site that was determined to be eligible for listing in the National Register of Historic Places.

- **Archeology Conclusions** - If new construction is proposed in the eastern portion of the FDA Campus, impacts to archeological site 18PR466, the Shadrack Beall Farmstead, should be considered. Archeological site 18PR466 meets the criteria for listing in the National Register of Historic Places. The site should be preserved in place and avoided by new construction. If the archeological site cannot be avoided, Phase III archeological mitigation is recommended.

In addition, the Urban Design Section has the following suggestions regarding building massing, viewsheds, on-site circulation, and planning materials:

- **Building massing and spatial pattern** - The existing FDA campus has been developed under four different master plans and established a unique site layout that features a central green open space surrounded by a series of human-scaled open courtyard spaces enclosed by midrise buildings. The open courtyards further complement the central green. Various buildings of different building techniques and finish materials from different time periods provide visual interest surrounding the open courtyards. This unique open space/courtyard pattern should be preserved in the new master plan for future expansion to maintain the integrity, continuity and strong spatial eligibility of the FDA campus.

- **Viewshed** - The existing FDA campus is part of the historic resources of the White Oak Naval Ordnance Laboratory Historic District. The prominent features of the primary viewshed from
New Hampshire Avenue to the campus are the existing Main Administration Building and the flagpole. The development alternative that continues the building massing and clustering of the existing campus will not only preserve the organic pattern of the FDA campus, but also preserve this historic vista from New Hampshire Avenue.

- **On-site circulation:** Pedestrian circulation needs to be strengthened within the proposed master plan by eliminating gaps in the existing network and by providing wider sidewalks that can accommodate bicycling. The master plan proposes 10-foot wide sidewalks only for the new loop streets. Ten-foot-wide sidewalks should be implemented in phases throughout the entire campus. Vehicular circulation is building on the existing roadways and oriented toward New Hampshire Avenue. An additional access road—FDA Boulevard off Cherry Hill Road is a good addition to improve the accessibility of the FRC campus. The master plan also includes construction of a new distribution center and truck screening facility and shows two possible locations—one is located along New Hampshire Avenue and the other is located in the northeast section of the site off FDA Boulevard. The Urban Design Section supports the location off FDA Boulevard because this location will separate truck traffic from the employee traffic and help evenly distribute trips to the larger campus. In addition, this location is very close to the Interstate Highway System, where the intersection of I-95 and Beltway I-495 is located.

- **Native Species:** The Federal Government is a leader in the sustainable development. The additional buildings on the campus will achieve LEED Gold certification. The master plan also provides some general design guidelines for future landscaping on the campus. The Urban Design Section suggests that in addition to the proposed landscaping design guidelines, all landscaping materials should be native species and all herbaceous planting materials should be pollinator friendly species.

Thank you for allowing us the opportunity to review this proposed project. The memoranda from the Planning Department staff are attached. If you have any questions or need additional information, please contact Maria Ann Martin, Special Projects Section, Countywide Planning Division, at 301-952-3472 or via email at Maria.Martin@ppd.mncppc.org.

Sincerely,

Andrea Green Checkley
Planning Director

Enclosures

c: Redis C. Floyd, Clerk of the Council, Prince George's County Council  
Gwen Wright, Planning Director, Montgomery County Planning Department  
Debra Borden, Principal Counsel, Legal Office  
Matthew Mills, Acting Principal Counsel, Legal Office  
Derick Berlage, Chief, Countywide Planning Division  
Carrie Sanders, Chief, Planning Area 2  
Patrick Butler, Acting Supervisor, Regulatory Review, Planning Area 2  
Maria Ann Martin, Planning Supervisor, Special Projects Section, Countywide Planning Division
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
ATTACHMENT 4
Good afternoon Ms. Lee.

I am a resident of the White Oak Science Gateway area and live directly across from the FDA campus. I am new in the area, and have been digging in to all the development, and lately the FDA expansion.

I was planning to testify before the Montgomery County planning board on May 3rd, but accidentally translated that date into May 13th, so missed my opportunity to testify. I have attached my analysis in the hopes that you might find it useful and I hope to testify in June at the upcoming board meeting.

Essentially, my concern is that the FDA Master Plan/EIS does little to help Montgomery County/Maryland taxpayers and the community understand the fiscal and social costs of the expansion, or any possible mitigation measures (along with any attendant costs). The analysis is completely inadequate, and I'm unclear how anyone is to understand the cost/benefits and also am concerned that the implied increase in costs is not being considered during design.

In the attached you will find that I did a back of the envelop calculation on the fire station expansion and came out with a rough operational increase in costs of around $2M a year. That means that the 10,000 people that are moving from Rockville to White Oak would need to eat around $50M more in lunches in order to recoup the $2M operational costs through the 6% tax. However the design does not contemplate the addition of any retail or food outlets by which to increase employee spending.

The FDA Master Plan and EIS also do not consider any public benefit that might be derived which could 'offset' the real operational cost burden of supporting the expansion. For example, the creation of a public plaza where the FDA could hold their farmer's market might be placed next to New Hampshire Blvd, along with the transit center (which might have food/retail space available), food truck parking, a band pavilion, a shared bike/walk path inside their fence line. Additionally the FDA could connect the Paint Branch trail north-south through their property. These benefits might reduce the projected costs for the county to build a bike path along New Hampshire Ave (estimated at $6.6M), and provide on-going public benefit that would offset the operational costs of the fire station expansion, for example.

I also have included screen shots from FermiLab in Illinois which is a Federal Property with a publicly accessible prairie and bison herd, trail network, science lab for school groups, and so forth. So, "it can be done"!

Finally, the GSA/FDA EIS does not contemplate real traffic distribution or parking alternatives. New Hampshire Ave is loud and congested, and will only get worse with the increased service and maintenance vehicles required by an expanded campus and conference center. The EIS didn't provide any analysis of creating a public-private partnership where they would use the Vi/va White Oak conference center- risks/cost-benefit would have been useful. Or lease current parking at the Sears White Oak store. There is a huge partially used parking lot already built. It also did not develop an analysis of spreading traffic throughout the White Oak Science Gateway Master Plan area, instead focusing ALL traffic onto New Hampshire Ave which is already overburdened and practically NOT expandable. The FDA has not provided real numbers for how many transportation vans (they are loud), trucks, delivery vehicles and so forth will be coming and going on a daily basis and what kind of noise and pollution these vehicles will pump onto New Hampshire Ave. No baseline noise tests have been done. Instead the EIS re-hashes the problem of intersection throughput-- certainly a dimension of the traffic problem, but not the whole picture.

I thank you in advance for your time. Please feel free to contact me with any questions you might have.

Gail Fisher
Hillandale Resident
757-619-9079
Comments on FDA Expansion and Environmental Impact Statement

Gail Fisher
Gail.fisher@gmail.com
Montgomery County and the State of Maryland should demand better data and analyses. There is no way to interpret what has been presented to make good decisions. There appears to be no data-driven analysis and design.

The design choices and discussion should be data driven in part. Preliminary analysis shows that the FDA expansion will cost the County and State more than $2M a year on an ongoing basis, but the design and EIS do not contemplate alternatives (and their costs/benefits) for generating the $2M. Likewise, the EIS and design do not contemplate alternatives that contribute to the community, county or State and examine costs/benefits. Montgomery County planning and the NCPCC cannot possibly make considered decisions given the lack of appropriate data and analysis.

Missing:

• Investment analysis to the taxpayer to include opportunity cost analysis, and an examination of the potential economic reward in the short/long term vice the short and long term costs along with any alternatives that should be considered
• Social cost/benefit analysis to the community
• Risk analysis to both the FDA as well as the Federal taxpayer and the community,
• An analysis of alternatives other than the 2 in the Master Plan
• Displacement costs—costs that the county/state will accrue to meet various emissions, run off and transit goals in OUTSIDE locales due to the FDA expansion
• Strategic planning and objectives analysis – will the expansion at the FDA help the community, county and State reach its goals?
The public and community costs of the FDA expansion are significant. The offset is not guaranteed nor even discussed in the Environmental Impact Statement (EIS) nor the County response to the EIS.

The public and community costs of the FDA expansion:

- Increased taxpayer burden for improved sewer service and maintenance over time
- Increased taxpayer burden for improved water service and maintenance over time
- Increased taxpayer burden for fire and safety upgrades and maintenance
- Potential for individual homeowner increase in property tax if fire station is removed
- Increased taxpayer burden for road and transit operation and maintenance due to increased traffic volume
- Taxpayer portion of cost to support a White Oak TMD
- Increased congestion as development outpaces mitigation solutions
- Local residents’ burden of increased noise due to higher employee, visitor and truck/heavy service vehicle traffic—probable reduction in property values of current homes given the age/condition of homes, non-walkability, current traffic/transit issues, noise. Viva White Oak will further devalue current homes because of desirability in comparison.
- Loss of tax revenue because the Federal Government does not pay taxes
- Loss of access to critical geography that is central to the neighborhood—a geographic divide
- Increased water pollution downstream into the Anacostia and then the Chesapeake Bay
- Loss of forest and natural area
- Displacement of costs as through the move/consolidation, the miles travelled per single employee in a vehicle will increase, making it more difficult for the county and state to achieve reductions in emissions and transportation, and water runoff cleaning/mitigation

Potential benefits of current plan—GSA does not pay taxes:

- Moves jobs from Rockville to White Oak—though migration of residency from Rockville to White Oak unlikely. Also hiring from local community is not guaranteed because no Federal rules would allow putting in place hiring practices to increase hiring from neighborhood.

*One underlying community issue relates to the schools which need additional resources and a better Socio-economic mix of students to increase the potential for all. This indicates the need for an opportunity cost analysis—do we invest the money to support an FDA expansion or do we invest the money in our schools?

- Assume a local multiplier effect—
  - “induced effect” (long term) where more employees means they will eat out/use local shops thereby creating jobs. However the effect is uncertain against the cost—particularly given design which creates difficulty moving to/from campus, with no public access nor any commercial opportunity
  - “direct/indirect effect” (short term) where construction will stimulate spending in local economy on trades, materials, hiring
Here is the Economic Analysis of the GSA EIS. Where are the data?

In general, an economic analysis includes numbers. This analysis neither provides any data nor provides an adequate description of how the conclusions are derived.

Furthermore, there are gross inaccuracies. There are no “new employees” being contemplated – the FDA consolidation at White Oak involves shifting existing employees from current leased offices to the White Oak campus. That means no new economic inputs are generated in the long run for the county/state.

Therefore, the design must strive to achieve economic stimulation in order to pay for itself.
Preliminary Investment Analysis Example
Investment analysis example: Estimated of costs for fire station expansion to support FDA expansion:
$23.2M in investment and nearly $2M a year in ongoing operational costs for increased staff

Cost to build a new 5-bay fire station at Rockville/White Flint: $29M*
Average cost per bay: $5.8M
Current fire station at Hillandale: 3 bays
Request by Hillandale VFD to support FDA expansion: 4 additional bays on 10 acres of land
Approximate cost to build 4 bays: $23.2M (not including land)

Current number of FTEs at Hillandale station 24: 12
Approximate operating cost per FTE in Montgomery County MD: $166,995*
Approximate operating cost for adding another 12 FTE to Hillandale FVD 12: $2,003,940

* Montgomery County budget website
Estimated of costs for transportation directly related to FDA expansion - $193M in investment and $900,000 a year in ongoing operational costs (transit not included)

Montgomery County estimate of cost to taxpayers to improve Hwy 29-Industrial Parkway intersection for FDA employees: $100M****

Estimate of cost to taxpayers to improve New Hampshire Ave-Powder Mill Dr. intersection: $5M

Estimate of cost to taxpayers to create Old Columbia Pike extension through White Oak shopping center: $23.4M

Estimate of capital cost to taxpayers to build BRT on New Hampshire Ave: $64.1M

Estimate for cost to build Hillandale transit center: $500,000

Total costs to taxpayers for road improvements directly attributable to the FDA expansion: $193M

Average cost in 2016 for road maintenance in Maryland, per mile: $81,912**

Average administrative costs in 2016 for road maintenance in Maryland, per mile: $19,773

Total average cost per mile in 2016 for road maintenance in Maryland (excluding new construction): $101,685

No. of miles of New Hampshire Ave included in White Oak Science Gateway master plan area (WOSG): 1.8

Total no of miles for primary road network in WOSG: 7

Total average cost per year for maintenance in 2016 dollars for primary road network in WOSG: $793,143

LATIP estimated costs for a Transportation Management Division: $13M (duration unspecified)

One-sixth of the cost (there are six developments in the White Oak Science Gateway Master Plan area): $2.2M

Average annual cost to run a TMD: $700,000.

FDA’s proportionate cost for running a TMD: $116,000

---


*** Attachment 1 to MDOT SHA response to GSA EIS

**** Page 8 "Cost Estimates" of the White Oak Science Gateway LATIP Cost Estimating Analysis Updated December 2017
The FDA expansion will cost ~ $216M in fire and road investments (only costs considered for this example) – will construction inputs offset this amount?

Federal Government does not pay taxes—no commensurate fiscal contribution to the community, county or state taxpayers

Total number of acres of FDA campus, White Oak: 710  
Total federally owned acreage in Montgomery County: 2,592*  
Total Federal payments in lieu of taxes to Montgomery County: $6,875* (not in thousands or millions – plain figure)  
Total Federal payment per acre to Montgomery County: $2.65

Let’s look at the Multiplier Effect - for every dollar spent on construction of new building, economy will be stimulated (short term); for every dollar spent on employee, they will spend money in local economy (long term)

Short term analysis:
Industry multiplier for construction projects to determine short term effect of construction: 2.33*  
Total cost of construction of FDA expansion per gross sf: $155 (using 2010 cost summary average and adjusting for 2018 dollars)  
Total gross sf planned expansion: 1.5M gsf in office and 400,000 gsf in other = 1.9M gsf  
Total cost for construction= $310M  
Hypothetical construction effect on the economy in the short term: $722M

Potentially a good deal for the tax payer in terms of benefits versus costs when ONLY using costs for roads and fire/safety in analysis (not including displacement or social costs or opportunity costs). May not be a good deal when adding other improvement costs.

*https://www.ccim.com/cire-magazine/articles/estimating-economic-impact/?gmSsoPc=1  
**In 2010 dollars:
The FDA expansion will cost about $2.9M a year in transportation and fire support on an ongoing basis. Is the expansion going to be self-sustaining?

There are NO NEW EMPLOYEES contemplated for the FDA expansion at White Oak – they are still taxpaying to Mtgmy County and Maryland. Therefore the Multiplier Effect is not useful. However....

Average salary of a federal employee in DC: $116,000*
Net pay based on married status, with 4 deductions: $51,515
Approximate state tax paid on $116,000, married with 4 deductions: $10,290
Total approximate taxes paid to Maryland by 10,000 FDA employees: $102.9M
Multiplier for economic stimulation generated by salaried employee: 2**
Total economic input created by 10,000 employees at an average wage: $1.03B
Tax revenue generated on $1.03B at 6%: $61M
Average amount Americans spend eating out at lunch per week: $11 ***
Total annual estimated lunch expenditures in White Oak for 10,000 additional employees: $5.7M
Maryland state sales tax: 6%
Total annual revenue to Maryland for lunch sales shifted from Rockville to White Oak:$342,000
Amount that each of the 10,000 employees would have to spend eating lunch out every week in order to create $2.9M a year in new tax revenues: $93 per week per employee
Total annual increase in lunch expenditures at White Oak required to generate $2.9M in tax revenue: ~ $48.3M

THE DEVELOPMENT ALTERNATIVES NEED TO EXAMINE WHETHER THEY WILL GENERATE ABOUT $50M IN FOOD REVENUES OVER AND ABOVE CURRENT BASELINES TO CONTRIBUTE TO THE COUNTY COSTS OF MAINTAINING THE CAMPUS!

**The actual multiplier is controversial. I used 2 as a number that rests between a variety of developed multipliers for this example: https://www.washingtonpost.com/blogs/ezra-klein/post/did-the-stimulus-work-a-review-of-the-nine-best-studies-on-the-subject/2011/08/16/gIQAThblb1_blog.html?utm_term=.7adab766a785
***https://www.bls.gov/opub/mlr/2000/05/art3full.pdf
Preliminary Social Cost Analysis
Traffic: Montgomery County must take ‘livability’ into account when examining the traffic issues relative to the SIX development projects in the White Oak Master Plan and attempt to mediate burdens across all six developments. The FDA plan and EIS are not helpful in this regard.

Every public document examines Level of Service at intersections – this is only ONE aspect of traffic that relates to congestion. In no document is the livability of the streets examined in relationship to all developments and communities.

Some relationships of importance:
- Vehicle travel rates decrease more slowly than density increases, creating congestion, noise, pollution
- Congestion, noise and pollution are KNOWN to decrease property values
- Land uses like commercial centers concentrate traffic; dispersed land uses spread traffic and decrease the density of vehicle travel

The FDA plan distributes more traffic onto HWY 650:
✓ New Hampshire Ave is fronted by residences – yet the FDA plan is to put more truck and heavy service vehicle traffic on HWY 650 by placing the screening facility on that side of the campus
✓ New Hampshire Ave already handles more traffic than it was designed for and CANNOT BE WIDENED – although the County LATIP includes a cost estimate for widening
✓ Cherry Hill Rd is not fronted by residences – an analysis of the vehicle distribution across all roads must be made
✓ Noise on New Hampshire already exceeds Montgomery County’s regulated levels at times – the EIS did not discuss noise levels that will likely increase due to heavy vehicle traffic, nor does the FDA TMP discuss remediation measures for the truck and heavy service vehicle burden
✓ New Hampshire Ave is currently 7 lanes at 12’ wide, 40 MPH, straight traffic (meaning speeding is common and likely given the configuration of the street) – the cross walk at the fire station has no pedestrian sanctuary in the median. Yet the transportation node is proposed as being ½ mile from road on FDA property
✓ The FDA plans to put the Conference Center, transit center, visitor entrance screening and visitor entrance all off New Hampshire Ave. Why?
Strategic Goals for White Oak – are they being met by the FDA expansion?

White Oak Science Gateway Master Plan says:
The Plan envisions White Oak’s major centers – Hillandale, White Oak, and Life Sciences/FDA Village evolving from conventional, auto-dependent suburban shopping centers, business parks, and light industrial areas into vibrant, mixed-use, transit-served nodes. Redevelopment of the centers must be carefully integrated with existing residential neighborhoods and designed to enhance the entire area’s quality of life, appearance, walkability, and sense of place. Existing residential neighborhoods will be maintained and enhanced within a physical environment that meets the community’s needs and aspirations.

Goal for natural area: The overall environmental goal for this Plan is to allow development at higher densities without compromising the environmental quality of this unique area. Development should respect and incorporate the natural environment, including the topography. (pg. 69)
Analysis of Strategic Goals for White Oak – are they being met by the FDA expansion? Here’s the score card.

-Do the FDA Master Plan alternatives carefully integrate the FDA property with existing residential neighborhoods? No. None offer integrative solutions that promote the area’s quality of life, and in fact the increase in traffic will be sure to degrade the livability of the existing community and further the geographic divide presented by the major highways and the inaccessibility of the FDA campus.

-Do the Alternatives enhance the appearance, walkability and sense of place for the existing community? No. None of the alternatives offer benefits to appearance, walkability and sense of place for the existing community. One of the alternatives offers a very tall building, out of scope with the current campus, and therefore detracts from the overall appearance of the campus to the community. All alternatives place a transit center far from the current residential area and offer no accommodation for foot traffic over/under New Hampshire Ave.

-Do the FDA Master Plan alternatives maintain and enhance the residential neighborhoods within a physical environment that meets the community’s needs and aspirations? No. The increase in vehicular, truck and heavy service vehicle traffic will cause significant decrease to the physical environment, and none of the alternatives contemplate mitigation. The FDA has not contemplated allowing public access to the Paint Branch Creek watershed, nor developing a running/bike trail along the inside of the perimeter of the property that would create a pleasant thoroughfare for the neighborhood to move to the proposed transit center, or to the community center. No accommodation is made for providing an over/under pass at New Hampshire for foot/bike travel to the transit center/campus. The FDA plan does nothing to enhance the existing residential neighborhood.

- Do the FDA Master Plan alternatives allow development at higher densities without compromising the environmental quality of this unique area? Development should respect and incorporate the natural environment, including the topography. All three alternatives return roughly the same effects upon the immediate environment on the FDA campus. No alternatives were developed that describe the effects of leasing existing office buildings and parking lots near the FDA campus as opposed to creating new structures. The effects on the Paint Branch Creek and Anacostia Rivers is unclear for all three alternatives. Noise pollution generated from increased vehicle and heavy truck/service vehicle traffic is not addressed, although will increase from today’s baseline. No baseline assessment has been provided. Public access to the natural areas of the FDA campus is not contemplated in any of the three alternatives, nor did the FDA contemplate developing public-private restoration activities for the Paint Branch Creek watershed given its steep topography.
In sum, the FDA Master Plan and EIS do not provide enough data and analysis to fully understand the implications of the expansion. Preliminary analysis suggests that the Master Plan will burden County and State taxpayers with no return or compensation either in terms of financial compensation through taxes or in terms of recreational/social improvements.
The FDA expansion offers opportunities to create “walking distance” shops and cafes for employees and the community, but these alternatives are not being considered/analyzed making ROI more difficult.

The FDA expansion is being considered absent any increased social/investment returns to the existing community, County, or State. There are precedents and support for design which would support increased investments on all fronts.
For an example, check out Fermilab in Illinois. They have an art gallery, a science center, and a prairie with Bison! All publicly accessible with a driver’s license or ID.

Fermilab in Illinois has a natural area where school groups learn about prairie ecosystems, a world class science center open for tours and classroom experiences, and an art gallery. It’s a great example for us to emulate!
The FDA is geographically central to the White Oak Science Gateway area, yet does not include any plans for public access, recreation or education.

White Oak residents will need somewhere to walk/ride their bikes to that is safe and local for work and recreation. Right now, the neighborhood is characterized by housing areas that are separated from commercial and recreation areas. Bike trail plans show paths that run along the major highways. There is nowhere to bike “to”, and the proposed paths would be unpleasant.

Paint Branch Creek trail from Montgomery County ends just north of HWY 29 at the Martin Luther King Rec Park.

Paint Branch creek trail from Prince George’s county ends just south of the Beltway.

GSA/FDA could provide public access via the existing Hillandale public park to a trail connection (red line) and still maintain its security perimeter. This would connect the community to the two recreation centers via a trail network.
The FDA could improve upon proposed bike/walking paths by developing a bike/run/walk path along the front property line that would connect the community and provide employees additional possibilities.

White Oak residents will need somewhere to walk/ride their bikes to that is safe. Right now, the neighborhood is characterized by housing areas that are separated from commercial and recreation areas by major highways. Bike trail plans show paths that run along the major highways (dashed lines on map). There is nowhere to bike “to”, and the proposed paths would be unpleasant, running alongside major highways. FDA could develop a bike/running/walking path that would run along its perimeter but off HWY 650 for employee and community recreation, which would connect the community to the recreation parks and center.

COST SAVINGS TO TAXPAYER: $6.6M in initial investment

Dashed lines: Proposed bike/walking paths running right along the highways. Paid for by taxpayers.

Orange line: Possible FDA provided path running just inside fence line, but outside security perimeter.
The FDA Master Plan can integrate the property with the community and create opportunities to capture a return on investment, increase property values, make employees happier, and in the long run produce a wonderful place to live and work.

Idea: Move the transit center forward to be near New Hampshire so local residents can walk to it, and create retail shops, cafes, and a central public plaza nearby that becomes a hub:

- Create a space near shops for FDA farmers’ market with public access
- Provide bike racks for the bike rental to take off
- Create a space for local food trucks to park near the transit center
- Create a ‘band pavilion’ for afternoon concerts/events that the neighborhood could access/enjoy on weekends or at night for movies and concerts, local food
- Create a local ‘art walk’ along ‘front lawn’
- Create a public garden/urban farm demonstration plot for the community and FDA employees with water conservation or new ‘green’ ideas demonstrated
- Create a childrens’ play ground and connect it to the local park with interesting play and exercise stations to promote exercise.
Orange: Shared bike/run/walk path on FDA property, inside fence, that links Hillandale Park to Martin Luther Rec Park and Hillandale Community Center. Part of path is an “art walk” displaying local artists work. Purple: Public access walking path on FDA property, linking Paint Branch Creek trails.

Leased/shared conference center with Viva White Oak would reduce risk to both entities. Also, truck screening area off Cherry Hill to distribute heavy traffic away from New Hampshire Ave.

Shared transit center with food and beverage retail area, parking for food trucks, a band pavilion, an outdoor plaza for the farmers’ market, and a childrens’ play area. Accessed via an over/underpass at the Hillandale Park stop light and again at the Michelson intersection.
The purpose of Montgomery County land use and development planning and zoning is to ensure equitable distribution of benefits and burdens between existing and future residents, developers, and public/commercial entities in a neighborhood.

The GSA/FDA Environmental Impact Statement does not adequately develop and analyze alternatives, and drives public attention to one sole issue of building height. The EIS sets up either an ‘expansion’ or ‘no expansion’ equation that is false. The inadequacy of the GSA/FDA planning and analysis makes Montgomery County’s/MNCPCC jobs nearly impossible.

The following alternatives must be analyzed and explained:

✓ The potential use of currently available vacant local office/parking space from tax-paying commercial property owners for office, conferencing or parking uses over the short-mid term or even as a long-term plan that reduces footprint, adds flexibility for FDA, and directly contributes to the local economy.

✓ The possibility of additions to the existing infrastructure on the campus for a portion of the required development and those possibly diminished effects on the environment, reduced costs to the taxpayer.

✓ The possibility of creating a public-private partnership with the Viva White Oak development to develop a conference center, parking lot or office space – TWO conference centers are currently being contemplated – one at Viva and one for FDA.

✓ Traffic distribution such as moving the truck screening facility to the Cherry Hill Road side of the campus which would unburden New Hampshire Ave or to an offsite area, with deliveries scheduled through an alternative entrance.

✓ Creating public benefit to offset public burden – for example creating access to a trail network up Paint Branch Creek.

✓ Creating public benefit by adding to the resilience of the surrounding community in the event of natural or man-made disaster.

✓ Creating a self-sustaining fire and safety capability as opposed to depending upon publicly-funded services as primary response.

✓ Creating a geographic connection between various portions of the neighborhood by using the FDA campus as a connector.
FYI

Stephen

-----Original Message-----
From: Bernard H. Berne <info@ncpc.gov>
Sent: Thursday, May 24, 2018 3:53 PM
To: NCPC General Information <info@ncpc.gov>
Subject: NCPC Website Email

Comment for June 7, 2018, National Capital Planning Commission Meeting

File No. MP201: United States General Services Administration, Federal Research Center, White Oak Campus, 10903 New Hampshire Avenue, Silver Spring, Maryland – US Food and Drug Administration Headquarters Consolidation Draft Master Plan

I ask the National Capital Planning Commission (NCPC) to disapprove the United States General Service Administration’s (GSA’s) FDA headquarters consolidation draft master plan. This environmentally unsound plan proposes three "Action" alternatives (Alternatives A, B and C). Each of these alternatives would place most of the proposed new buildings on the east side of the present FDA campus, which is located in the White Oak area of Montgomery County, Maryland, approximately three miles northeast of the Silver Spring Metro Station.

These new buildings will be more than 2000 feet from New Hampshire Avenue, which presently contains a number of Metrobus and Ride-On Bus Routes that operate frequently. Further, GSA plans to locate a new FDA transit center would be located at the west side of the campus. This transit center will be at least a quarter of a mile from most of the new buildings.

In addition, the new buildings will be more than 0.5 miles from the Montgomery County Department of Transportation’s White Oak Transit Center, which is located near the intersection of New Hampshire Avenue and Lockwood Drive. A substantial number of bus routes presently converge at this Transit Center. Further, the Department of Transportation is planning to construct at this Transit Center a station for its US 29 Bus Rapid Transit (BRT) line. The BRT line is scheduled to begin operations in early 2020 (see https://www.montgomerycountymd.gov/brt/us29project.html and pages 11-13 in the Draft Transportation Management Plan that Stantec Consulting Services, Inc., has prepared for the GSA).

The location of these proposed new buildings contradicts Section A (Policies Related to Locating Federal Workplaces), FW.A.3, on page 12 of NCPC’s 2016 Federal Workplace Element of the Comprehensive Plan for the National Capital, which states:

“1. Locate federal facilities within walking distance of existing or planned fixed route transit services, such as Metrorail, MARC, VRE, light rail transit; streetcar, or bus rapid transit.”

Intra-campus shuttles within the FDA headquarters facility presently operate infrequently. As a result, nearly everyone will drive automobiles when commuting to the new buildings. Few people will use public transportation.

FDA’s new facilities will therefore add traffic congestion and air pollution to the National Capital Region. This is especially true because nearly all of the FDA offices that will relocate to the consolidated FDA headquarters facility are presently located near Metro stations or are adjacent to major traffic arterials on which major bus routes with frequent service presently operate.
GSA’s March 2, 2018 draft FDA Federal Research Center Master Plan fails to discuss the decrease in public transportation usage that will result from each of the three "Action” alternatives. NCPC needs to address this.

The draft master plan also fails to evaluate an alternative that would place new buildings in the portion of the Federal Research Center (FRC) that is located west of the FDA campus’ existing buildings. This now-vacant open space once contained a golf course.

This area is adjacent to New Hampshire Avenue. The area is within a tenth of a mile of the White Oak transit center described above that will contain a bus rapid transit station in 2020. Locating the new buildings in this area would conform to FW.1A.3 in the Federal Workplace Element.

It appears that GSA is keeping this area vacant to enable the area to serve as a buffer between New Hampshire Avenue and the FDA campus. This buffer once separated the Naval Ordinance Laboratory’s (NOL’s) industrial and military facilities from New Hampshire Avenue.

GSA has removed nearly all of the NOL’s facilities from the area that is near this vacant open space, leaving only the NOL’s main administration building (FDA Building 1) and a former fire house. Therefore, the open space is no longer serving its historical purpose.

Further, the FDA headquarters has no need for a buffer that is as wide as FRC’s open space near New Hampshire Avenue. The security needs of the FDA’s headquarters are considerably less than are those of the NOL. Further the FDA’s facilities do not have the visual appearance of an industrial facility and do not produce the explosive noises that the NOL did.

The open space presently contains an environmentally-sensitive small stream valley. However, the GSA can relocate the stream and the valley to the portion of the FRC that is immediately adjacent to New Hampshire Avenue. This would permit the stream valley to serve as a security buffer for the FDA’s new buildings.

Page 70 of the GSA’s draft master plan proposes in Alternative B the location of a 20-story office building on the eastern end of the FDA Campus. GSA could instead locate one or more such 20-story buildings in the FRC’s present open space near New Hampshire Avenue.

Locating such high buildings in this area would be consistent with existing neighborhood conditions. A high-rise residential complex (“The Enclave”) containing three 20-story building presently occupies a space near the northwest corner of Lockwood Drive and New Hampshire Avenue. The Enclave’s buildings are within 0.25 miles of the open space within the FRC that is near New Hampshire Avenue.

The GSA’s failure to consider locating FDA’s new buildings within the area of the FRC that lies between FDA’s existing buildings and New Hampshire Avenue has resulted from an extremely deficient GSA planning process. Each of GSA’s three “Action” alternatives will discourage the use of public transportation for everyone working at or visiting the FDA headquarters facility. This situation is completely avoidable, as the area appears to be large enough to accommodate most or all of the new buildings near the east side of FDA’s campus that each of GSA’s three "Action” alternatives propose.

I therefore suggest that NCPC ask the GSA to construct most of its proposed new buildings in the open space between New Hampshire Avenue and the west side of the present FDA campus, rather than near the east side of the campus.

Further, the project contradicts NCPC’s goal of restoring the historic distribution of federal employees within the National Capital Region. The Federal Workplace Element states on page 3:

“A 1968 Comprehensive Plan policy stated that 60 percent of the region’s federal employees should work in the District of Columbia with 40 percent located elsewhere in the region. This “60-40” policy remains in effect today. …. By 1990, the District of Columbia’s share of the region’s federal employment was reduced to approximately 52 percent. It has remained at this general level through 2013.”

To comply with the Federal Workplace Element and with Executive Order 12072 (Federal Space Management)
(cited on page 7 of the Federal Workplace Element), GSA needs to relocate FDA’s offices to a new facility that is located within the District of Columbia, rather than to relocate the offices to White Oak. The lack of any such alternative is a major setback to the goals that Federal Workplace Element sets forth.

I therefore suggest that the NCPC ask the GSA to comply with the NCPC’s “60-40” policy and with Federal Space Management requirements that Executive Order 12072 sets forth by consolidating within the District of Columbia those FDA facilities that the GSA is planning to consolidate at White Oak.

Bernard H. Berne
4316 N. Carlin Springs Road, #26
Arlington, VA 22203-2035
bberne@yahoo.com
FYI. I will confirm receipt of this request.
Thanks,
Julia

-----Original Message-----
From: info@ncpc.gov <info@ncpc.gov>
Sent: Tuesday, May 22, 2018 6:22 PM
To: NCPC General Information <info@ncpc.gov>
Cc: Koster, Julia <julia.koster@ncpc.gov>
Subject: Speaker Registration for US Food and Drug Administration Headquarters Consolidation Draft Master Plan

Registration to speak at the next meeting on NCPC Website

Full Name: Bernard Berne
Email: bbberne@yahoo.com
Phone: 703-243-0179

Project Name: US Food and Drug Administration Headquarters Consolidation Draft Master Plan Project Number: MP201
Representing:
Organization:

Comment:

I ask NCPC to disapprove the General Service Admistration's (GSA's) FDA headquarters consolidation draft master plan. This environmentally unsound plan proposes three "Action" alternatives. Each of these alternatives would place most of the proposed new buildings on the east side of the present FDA campus, which is located in the White Oak area of Montgomery County, Maryland.

These new buildings will be more than one-quarter of a mile from New Hampshire Avenue, which contains a number of Metrobus and Ride-On Bus Routes. Further, a proposed FDA transit center would be located at the west side of the campus, also at least a quarter of a mile from most of the new buildings.

Intracampus shuttles presently operate infrequently. As a result, nearly everyone will drive automobiles when commuting to the new buildings. Few will use public transportation.

The new facilities will therefore add traffic congestion and air pollution to the National Capital Region. This is especially true because nearly all of the FDA offices that will relocate to the consolidated FDA headquarters facility are presently located near Metro stations or are adjacent to major traffic arterials on which major bus routes with frequent service presently travel.

GSA's draft environmental impact statement for the FDA headquarters consolidation fails to discuss the decrease in public transportation usage that will result from each of the three "Action" alternatives. NCPC needs to address this.

The draft Environmental Impact Statement for the headquarters expansion also fails to evaluate an alternative that would place new buildings in a large federally-owned area that is located near the west side of the FDA campus. This now-vacant area once contained a golf course.

This area is adjacent to New Hampshire Avenue. The area is within a tenth of a mile of a Montgomery County transit center located near the corner of Lockwood Drive and New Hampshire Avenue.
It appears that GSA is keeping this area vacant to enable the area to serve as a visual buffer between New Hampshire Avenue and the FDA campus. This is extremely poor planning, as it discourages the use of public transportation for everyone working at or visiting the FDA headquarters facility. The area appears to be large enough to accommodate most or all of the new buildings that each of GSA's three "Action" alternatives propose.

Further, the project does not comply with NCPC's goal of restoring the historic distribution of federal employees within the National Capital Region. That goal specifies that 60% of federal employees in the Region will work in the District of Columbia, while 40% will work in Maryland and Virginia. At present, fewer than 55% of federal employees in the Region work in D.C.

To comply with NCPC's goal and with Executive Order 12072 (Federal Space Management), GSA needs to begin to make plans to develop a new FDA headquarters facility within the District of Columbia. GSA's failure to consider any such alternative is a major setback to the goals set forth in the Federal Element of NCPC's Comprehensive Plan for the National Capital Region.