

Record of Decision

for the 2018 Master Plan for the Consolidation of the U.S. Food and Drug Administration at the Federal Research Center at White Oak in Silver Spring, Maryland

1. Background and Purpose and Need for the Proposed Action

1.1 Background

The U.S. General Services Administration (GSA) in cooperation with the U.S. Food and Drug Administration (FDA) has prepared a Master Plan for the consolidation of the 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, now known as the FDA Campus. In the fiscal year 2016, Congress provided funding “for FDA to complete a feasibility study and Master Plan for land inside and contiguous to the White Oak campus to address its expanded workforce and the facilities needed to accommodate them.” On August 3, 2017, Congress passed the FDA Reauthorization Act (FDARA) of 2017. This new legislation reauthorized the user fee programs necessary for continued support of the agency’s pre-market evaluation of prescription drugs, medical devices, generic drugs, and biosimilar products. Due to these Congressional mandates, FDA is projecting that there will need to be an increase in employees and campus support staff at the FDA Campus. Therefore, GSA has prepared a Master Plan to accommodate future growth and further consolidate FDA operations. The Master Plan will provide a framework for development at the FRC to accommodate up to approximately 18,000 FDA employees and support staff. GSA completed an Environmental Impact Statement (EIS) that assessed the impacts of the population increase and additional growth needed on the FRC to support the increased population.

1.2. Purpose of and Need for the Proposed Action

The purpose of the proposed action is to provide a Master Plan for the FDA Campus at the FRC to support further consolidation of FDA employees and projected growth. Since the 2006 Master Plan was completed, new authorities have been added to, and original authorities have expanded, the FDA’s mission. The result is a significant increase in the personnel projected for the FDA Headquarters. Currently, FDA has 10,987 personnel assigned to the FDA Campus with a peak daily population of 7,793. The projected growth for FDA is additional 7,018 employees, which includes funded staff vacancies, existing employees currently in leased space in suburban Maryland, FDA support staff, and future growth.

A Master Plan is needed to continue to support the FDA Headquarters consolidation at the FRC and to provide the necessary office space to conduct the complex and comprehensive reviews mandated by Congress. To accommodate an increase in personnel, office space at the FRC needs to be expanded. Infrastructure improvements are also needed to serve the increase in office space and campus

population. A Master Plan has been prepared to guide the development at the site to accommodate up to approximately 18,000 people at the FRC. The Master Plan will steer the planning, design, and construction of new buildings; improvements to roadways, utilities, and other infrastructure; and the protection of natural areas.

The proposed action assessed in the EIS is the implementation of a Master Plan for FDA, to include the following:

- Development of up to an additional 1,604,393 gross square feet (gsf) of office space and 616,756 gsf of special/shared use space to accommodate the increased population and to support FDA's mission;
- Provide parking at a ratio of 1 parking space for every 1.8 employees (1:1.8) for a total of 10,000 parking spaces for FDA employees and campus support staff;
- Increase Visitor parking from 1,000 to 1,615 parking spaces; and,
- Reconfiguration of the East Loop Road to allow for ease of access into and out of the FDA Campus.

2. U.S. General Services Administration Decision

As Regional Commissioner of the GSA Public Buildings Services, and in support of the FDA, it is my decision to approve this Record of Decision (ROD) and thereby implement the Preferred Alternative – Alternative C. This action is necessary to continue to support the FDA Headquarters consolidation at the FRC and to provide the necessary office space to conduct the complex and comprehensive reviews mandated by Congress. This ROD allows GSA to implement all portions of development as outlined in the 2018 Master Plan as analyzed in the EIS. This alternative includes the following:

- A 16-story and a 14-story office building placed on the eastern end of the FDA Campus; providing 1,920,624 gsf of new office space, shared use space, and special space;
- Two additional new office buildings 6- to 8-stories tall;
- Three new parking garages;
- A Communications Center placed with the new buildings on the eastern end of the campus;
- A Conference Center placed on the northwest quadrant and existing main campus;
- A Distribution Center located adjacent to the northeast parking garage;
- A Truck Screening Facility located at the entrance to the FDA Campus on Michelson Road; and,
- A Transit Center located on the existing northwest surface lots.

All practicable means of avoiding or minimizing environmental harm from the Preferred Alternative were adopted. **Appendix A** contains graphics that outlines the Preferred Alternative.

3. Rationale for Decision

The decision to implement the Preferred Alternative as described in the 2018 Master Plan EIS is based on balancing the likely adverse impacts to the FRC and the local community with the mission and needs of FDA. The Preferred Alternative will help create a compact walkable campus and will provide the necessary office space to conduct the complex and comprehensive reviews mandated by Congress. The configuration of buildings under the Preferred Alternative reinforces and extends the campus/courtyard concept, adds places for creative exchanges and collaboration to foster administrative and scientific innovation, creates state-of-the-art work spaces that will attract world-class scientists, stimulates public confidence in FDA's operations, and provides barrier-free accessibility to campus facilities to persons with disabilities. The Preferred Alternative will have fewer impervious surfaces and less development in the stream valley buffer than the other alternatives considered. This alternative locates the Distribution Center on the northwest side of the campus closer to the proposed location of the Truck Screening Facility with direct access to the already-developed tunnel system.

4. Alternatives Considered

4.1 Alternatives Considered in the 2018 Master Plan EIS

During the initial planning for this project, urban planners, architects, architectural historians, environmental scientists, engineers, and economists considered site constraints, traffic impacts, and the mission of FDA to develop several alternatives to support further consolidation of FDA employees and to meet the projected growth. Planning also took into consideration comments received during the scoping period for the proposed action. For the 2018 Master Plan, GSA considered a range of alternatives to accommodate an increase of approximately 7,018 FDA employees and support staff at the FDA Campus. GSA studied three action alternatives for accommodating the additional employees and support staff on the FDA Campus in addition to the No-Action Alternative.

4.1.1 No-Action Alternative

With the No-action Alternative, FDA would continue its current operations at the FRC. At present the campus includes:

- A total of 10,987 personnel assigned to the FDA Campus with a peak daily population of 7,793;
- A total of 3,766,605 gsf of office, lab, and central shared/other special spaces with 60,438 gsf of bridges and tunnels and 996,9758 gsf of parking garages for a total of 4,824,018 gsf;
- A total of 6,817 parking spaces (including visitor parking); and,

- Child Care Center located on the south side of the FDA Campus.

4.1.2 Alternative A: Mid-Rise Buildings

With Alternative A, building heights would be in the range of existing buildings, maintaining the planning principle of buildings defining a series of courtyard spaces in the tradition of great university campuses. The buildings will not be visible from New Hampshire Avenue. New buildings would be placed at the eastern end of the commons and the plaza would be extended to the new buildings to facilitate a walkable campus. Alternative A will also include the following:

- A total of 1,910,906 gsf of office buildings, shared use space, and special use space;
- Four new office buildings from two to 11-stories tall;
- Three new parking garages;
- A pedestrian bridge to connect the southeast parking garage and office building with the new office buildings on the east side of the FDA Campus;
- A Communications Center placed under the extended plaza;
- A Conference Center placed in the northwest quadrant of the existing main campus;
- A Distribution Center located adjacent to the northeast parking garage;
- A Truck Screening Facility located at the entrance to the FDA Campus on Michelson Road; and,
- A Transit Center located on the existing northwest surface lots.

4.1.3 Alternative B: One Large Tower Office Building

With Alternative B, a 20-story office building would be placed on the eastern end of the FDA Campus. The high-rise office building will be visible from New Hampshire Avenue, Route 29, and the Capital Beltway. Additional mid-rise buildings will also be placed at the eastern end of the commons and the plaza would be extended to facilitate a walkable campus. Alternative B would also consist of the following:

- A total of 1,952,627 gsf of office space, shared use space, and special space;
- Four new office buildings from 2- to 20-stories tall;
- Three new parking garages;
- A Communications Center placed under the extended plaza;
- A Conference Center placed in the northwest quadrant of the existing main campus;
- A Distribution Center located adjacent to the northeast parking garage;
- A Truck Screening Facility located at the entrance to the FDA Campus on Michelson Road; and,

- A Transit Center located on the existing northwest surface lots.

4.1.4 Alternative C: Two Large Tower Office Buildings (The Preferred Alternative).

With Alternative C, a 16-story and a 14-story office building will be placed on the eastern end of the FDA Campus. The high-rise office buildings will be visible from New Hampshire Avenue. Additional mid-rise buildings will also be placed at the eastern end of the commons and the plaza will be extended to facilitate a walkable campus. Alternative C will also consist of the following:

- A total of 1,920,624 gsf of office space, shared use space, and special space;
- Four new office buildings from two to 16-stories tall;
- Three new parking garages;
- A Communications Center placed under the extended plaza;
- A Conference Center placed in the northwest quadrant of the existing main campus;
- A Distribution Center located adjacent to the northeast parking garage;
- A Truck Screening Facility located at the entrance to the FDA Campus on Michelson Road; and
- A Transit Center located on the existing northwest surface lots.

4.2 Development Strategies Dismissed from Further Detailed Analysis

To meet the purpose of the proposed project, the GSA Master Plan team conducted a Land Use Feasibility Study to evaluate the feasibility of accommodating up to 18,000 FDA employees and support staff at the FRC. Four development strategies were examined to determine the suitability of the FRC to handle the additional employees:

- Development Strategy A: Development Adjacent to the Existing FDA Campus;
- Development Strategy B: Development in the Center of the FRC;
- Development Strategy C: Development in the Eastern Portion of the FRC; and,
- Development Strategy D: Development in the Eastern Portion of the FRC with additional Parking to Reach Existing Capacity.

From input received during Public Scoping, Development Strategy A was carried through for further analysis in the EIS and Development Strategies B, C, and D were dismissed from further analysis because they did not fully meet the purpose and need for the 2018 Master Plan and did not fully meet the goals and aspirations of the 2018 Master Plan. Specifically, development strategies B, C, and D did not:

- Create a collegial environment to foster scientific interaction due to the distance of the new buildings from the existing FDA Campus;

- Create opportunities for constant, creative interchange and collaboration; and,
- Create efficiencies through shared use.

Development Strategy A was the basis for the action alternatives studied in detail in the 2018 Master Plan EIS.

5. Environmental Consequences of the Preferred Alternative

Potential environmental consequences from implementing the Preferred Alternative have been identified by resource area and are shown in Table 1.

Table 1. Comparison of Impacts

Resource	Action Alternatives
Soils, Topography, and Geology	Major, long-term, direct, adverse impacts from the clearing, grading, and excavation of 36.6 acres for new building areas and disturbance of 0.61 acres of steep slopes will occur. A minor, short-term, indirect, adverse impact from soil erosion during construction will occur.
Surface Water and Wetlands	<p>Two hundred sixty-six linear feet of permanent stream impacts and 4.66 acres of permanent impacts to stream valley buffers will result from implementation of the Master Plan. There will be no permanent impacts to wetlands. The long-term impact will, therefore, be moderate and adverse. An additional 10.22 acres of impervious cover will be added to the FRC.</p> <p>The indirect impacts will be minor to moderate, long-term, and adverse from the potential increase in stormwater runoff, which could reduce water quality and degrade the biodiversity of streams. During construction, clearing, grading, and road and building construction may result in temporary impacts to streams and wetlands due to increased soil erosion and potential spills of contaminants. The negligible, short-term, adverse impacts will be minimized using best management practices (BMPs).</p>
Vegetation	<p>Moderate, long-term, direct, adverse impacts to vegetation will occur due to the clearing of 6.7 acres of forest. In addition, approximately 3.0 acres of maintained lawn will be removed.</p> <p>Habitat fragmentation will also occur that will expose more forested areas to the potential establishment of invasive species. Removal of forest, wetland vegetation, and maintained lawn will result in long-term, moderate, adverse impacts. There will also be minor, long-term, indirect, adverse impacts to vegetation due to increased airborne pollutants.</p> <p>During construction, clearing, grading, and road and building construction may result in temporary impacts to vegetation due to the temporary removal of vegetation for staging and laydown areas. The negligible, short-term, adverse impacts will be minimized using BMPs.</p>
Wildlife	As with the impacts to vegetation, the removal of forest will result in a loss of habitat for terrestrial wildlife within the study area. Fragmentation of the forest will also affect the movement of wildlife and increase potential conflicts with humans. However, no particular species which are currently utilizing the site are

	<p>likely to be eliminated as a result of the 2018 Master Plan.</p> <p>The increased impervious surface area will increase run-off into the stream habitat of aquatic wildlife, and potential erosion and sedimentation from construction will add to the degradation of the aquatic habitat. Therefore, long-term, negligible to minor, adverse impacts to wildlife will result.</p>
Air Quality	<p>Minor, long-term, direct, adverse impacts from mobile sources due to additional traffic will occur.</p> <p>There will be negligible, long-term, direct, adverse impacts from stationary sources from the operation of additional facilities and minor, short-term, indirect, adverse impacts during construction due to fugitive dust and emissions from construction equipment.</p> <p>The Master Plan will conform to the Washington Metropolitan Region State Implementation Plan.</p>
Greenhouse Gas and Climate Change	<p>Implementation of the 2018 Master Plan will have minor, long-term, direct, and adverse impacts due to a slight increase in stationary and mobile source greenhouse gas emissions.</p> <p>Minor, short-term, direct, adverse impacts will occur during construction due to greenhouse gas emissions from construction equipment.</p>
Land Use Planning and Zoning	<p>The consolidated expansion of the FDA Campus will encourage efficiency, higher productivity, and collaboration that is consistent with the Federal Elements of the Comprehensive Plan for the Nation's Capital.</p> <p>A Transportation Management Plan (TMP) was developed that encourages alternative means of transportation. The TMP and the 2018 Master Plan are consistent with the Transportation Element and construction and operations at the FDA Campus and will occur in an energy efficient manner that is consistent with the Environmental Element.</p> <p>The 2018 Master Plan will be consistent with White Oak Science Gateways Master Plan because the expansion will attract and support new businesses to the area and will also be consistent with Prince George's County's Subregion 1 Plan's goals for green design, sustainable development, and attracting new employment opportunities. Land use within the project area will change, which will result in a negligible, long-term, adverse impact to land use planning.</p>
Community Facilities and Services	<p>Minor, long-term, indirect, adverse impacts to schools will occur from a potential increase in students due to potential relocations of FDA employees if they choose to move closer to the FDA Campus.</p> <p>Minor, long-term, indirect, adverse impacts to parks, recreation, or open space will occur due to increased usage by FDA employees. However, it is expected that the potential increased usage of parks, recreation facilities, or open space will not exceed the availability of resources in the area.</p>
Economy and Employment	<p>Increased patronage of local businesses and increased contractor and vendor opportunities will result in minor, long-term, indirect, beneficial impacts to local economy and employment.</p> <p>Due to new hires from outside the county; moderate, long-term, direct, beneficial impacts will occur from a potential increase in employment in Montgomery and Prince George's counties employment.</p> <p>During construction, minor, short-term, direct, beneficial impacts from the employment of construction workers and from purchases of materials and</p>

	<p>equipment will occur.</p> <p>There will be no significant impact to property taxes because the FRC is under Federal ownership. FDA employee income and spending will contribute to moderate, long-term, direct and indirect, and beneficial impacts to sales and income tax revenues within the counties.</p>
Safety and Security	<p>Minor, long-term, direct, adverse impacts will occur to local police, fire, and EMS stations due to an estimated increase of 75 fire/rescue/EMS incidents per year, and negligible, short-term, direct, adverse impacts will occur during construction due to potential construction site hazards.</p> <p>The proposed Montgomery County Fire and Rescue Service fire station northeast of the FRC will help to handle any increase in calls for fire and EMS service. A new centralized Visitor and Transit Center will provide a single point of entry for all visitors and will streamline visitor security screening. A centralized Truck Screening Facility will allow for trucks and delivery vehicles to be screened prior to entering the FDA Campus. These new facilities will result in moderate, long-term, direct, and beneficial impacts.</p>
Cultural Resources	<p>The placement of the Conference Center and the northwest Parking Garage will not affect the remaining historic resources on the FDA Campus (Building 1 and 100, the flagpole, and the redesigned circle in front of Building 1).</p> <p>The high-rise buildings will be taller than the existing buildings at the FDA Campus and will be visible from New Hampshire Avenue. Because the high-rises are not consistent with the height and massing of the historic buildings and subsequent FDA Campus development under the compatibility standards established in the 2002 amended MOA, their construction will result in an adverse effect to the visual setting of the façade of Building 1 in the primary Area of Potential Effect (APE) under Section 106 of the National Historic Preservation Act (NHPA).</p> <p>Negligible, long-term impacts due to the construction of the East Parking Garage will occur, which will adversely impact an ineligible archaeological site (18MO738).</p>
Traffic & Transportation	<p>The increase in employees will have major, long-term, direct, adverse impacts to traffic volumes, which will cause additional delays and queuing at multiple intersections near the FRC. Sixteen intersections will operate at an overall level of service E or F. This will require improvements to several intersections.</p> <p>There will be no significant impacts to existing transit services (bus routes, Metro, and MARC) and moderate, long-term, direct, beneficial impacts to bicycle access will result from the addition of sidewalks, secure bike parking, locker room and shower facilities, and bike repair stations.</p>
Utilities	<p>Minor, long-term, direct, adverse impacts to water service due to increased demand.</p> <p>The additional sewer flow expected under the proposed 2018 Master Plan, combined with the existing sewer flow, future flow from other large developments in the area, and peak rainwater infiltration flows during a 10-year storm event will likely exacerbate existing sewer overflows downstream in the Paint Branch Sewer Basin. The potential to contribute to offsite sewer overflows represents a long-term, indirect, major, adverse impact to sanitary sewer service. However, by implementing mitigation, the major impact to sanitary sewer service will be minimized, resulting in a long-term, indirect, minor, adverse impact.</p>

	There will also be a minor, long-term, direct, adverse impact to electrical and HVAC service because of an increased demand on the power grid.
Waste Management	Minor, short-term, direct, adverse impacts to waste management will occur due to the temporary increase in construction waste. Minor, long-term, direct, adverse impact to waste management because of the increase in the amount of solid waste, food waste, and recyclables handled at waste-receiving facilities. A Distribution Center will consolidate the waste streams of most of the existing and proposed campus buildings, which will provide a centralized, efficient system for trash and recycling sorting, storage, and removal resulting in long-term, beneficial impacts.

6. Environmentally Preferable Alternative

The Council on Environmental Quality (CEQ) Regulations § 1505.2 requires Federal agencies including GSA to identify all alternatives considered by the agency in reaching its decision, specifying the alternative or alternatives which were considered to be environmentally preferable. GSA has outlined the environmentally preferable alternative(s) by resource area to reflect the balanced approach necessary when evaluating a long-term master plan. Table 2 presents the environmentally preferable alternative by resource area as identified by the impact analyses in the EIS.

Table 2. Environmentally Preferable Alternative(s) by Resource Area

Resource Area	No-Action Alternative	Alternative A	Alternative B	Alternative C
Soils, Topography, & Geology	<input type="checkbox"/>			
Surface Water & Wetlands	<input type="checkbox"/>			
Vegetation	<input type="checkbox"/>			
Wildlife	<input type="checkbox"/>			
Air Quality		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Greenhouse Gas & Climate Change	<input type="checkbox"/>			
Land Use Planning & Zoning		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Community Facilities & Services	<input type="checkbox"/>			
Economy & Employment		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Safety & Security		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cultural Resources	<input type="checkbox"/>			

Traffic & Transportation	<input type="checkbox"/>			
Utilities	<input type="checkbox"/>			
Waste Management	<input type="checkbox"/>			

7. Public Involvement

7.1 Public and Agency Review of the 2018 FDA Master Plan Final EIS

Throughout the preparation of the EIS, GSA consulted with numerous Federal, State of Maryland, and local agencies and community groups, stakeholders, and members of the public. The intent of the consultation was to provide information on the project, solicit information on issues that could affect the outcome of the project, and seek input on alternatives and potential impacts. FDA was designated as a “cooperating agency” on the preparation of the EIS and input from them has been incorporated into the EIS.

7.2 2018 FDA Master Plan EIS Scoping

GSA issued a Notice of Intent (NOI) to prepare an EIS on August 18, 2017. 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. The letters included information on the public scoping meeting and asked for the public’s comments on the proposed FDA Master Plan. GSA held a public scoping period on the EIS from August 21, 2017, through September 25, 2017. GSA also held an Open House for the public on September 12, 2017.

The environmental issues identified through the initial scoping efforts for the EIS and the interdisciplinary team process are listed below (see **Table 3**). The indicators listed under each of the impact areas (such as transportation) are measures used in the impact analysis in Chapter 3 of the EIS to determine if there will be an impact from the alternative and the severity of the impact.

Table 3. Summary of Scoping Comments

Area of Concern	Comment	Where addressed in the EIS
Proposed Action	Not in favor of the proposed action as it is a waste of tax dollars.	The need for the proposed action is included in Section 1.1.2.
	In favor of the proposed action as it will concentrate development at White Oak.	Comment noted.
Alternatives	Not in favor of tallest building	Impacts to viewsheds are assessed in

	alternative.	Section 3.12.2.4.
Natural Resources	Concerned with the impact on the Paint Branch tributary.	Paint Branch will not be directly impacted by the action alternatives. Impacts to surface waters are assessed in Section 3.3.3.
	Look at stormwater facilities underground – similar to ones designed in Cheverly and for the ICC.	Stormwater management is assessed in Section 3.3.5.
	Concerns with increased air pollution.	Air quality impacts are assessed in Section 3.6.
	Concerns with additional erosion and water pollution.	Impacts from erosion and stormwater runoff are assessed in Sections 3.2.4 and 3.3.5.
	Would like wooded buffer zone next to Hillandale neighborhood to remain intact.	The Action Alternatives avoid impacts to the wooded buffer along the Hillandale neighborhood.
	Concerned with loss of habitat.	Impacts to wildlife and habitat are discussed in Sections 3.4 and 3.5.
	Would like to see the incorporation of green roofs and LEED architectural features and maximize the retention of trees.	New buildings on the FDA Campus will be constructed to LEED® Gold certification and net-zero energy and water usage will be achieved. Green roofs will be used if practicable. Impacts to forested areas are discussed in Section 3.4.
Community Services/Amenities	Is there an agreement with the CHI Center to provide backup childcare or to provide shelter in the event of an emergency?	No, there is not. The comment was investigated and there is not an agreement with the CHI Center. The Childcare center has an established evacuation plan that does not include the CHI Center.
	Use of Federal land for Hillandale Volunteer Fire Department Station/12 expansion.	GSA through its Urban Planning and Good Neighbor Program is committed to exploring ways to provide public access to government lands. GSA is working with the M-NCPPC to review the inputs collected during scoping and collaborate to identify possible uses. Additionally, there are specific guidelines that must be followed in
	Hillandale Local Park – athletic fields (i.e.- Soccer.) Requesting land along the Maryland-National Capital Park and Planning Commission (M-NCPPC) southern fence. The park is also undergoing renovation scheduled to be	

	completed 2020-21.	order for non-Federal entities to acquire Federal land; the property must first be declared excess or surplus by the Federal government. Once it is declared surplus it can be made available for use through public benefit conveyances.
	Would like to see officer's houses that border Hillandale neighborhood sold so that the land could be developed with houses that would fit with the neighborhood. This would include moving the FRC fence line back. This area was previously open to the public.	
	Provide public access to trails on the FRC for hiking, walking, bicycling, etc. and access to Paint Branch Creek from Hillandale and Viva White Oak. Some neighbors want public access to proposed Fitness (walking and exercise) Trail on FRC/FDA Campus.	GSA through its Urban Planning and Good Neighbor Program is committed to exploring ways to provide public access to government lands. GSA is working with the M-NCPPC to review the inputs collected during scoping and collaborate to identify possible uses. Possible opportunities will also have to be explored and reviewed for consistency and compatibility with the Level IV Security Requirements of the FDA Campus which restrict access to public vehicles and pedestrian access beyond security checkpoints.
	Make FRC/FDA Campus more accessible to White Oak community.	
	Move security fence 50'-100' of the northern portion of FDA and repave Perimeter Road in order to provide E/W access.	
	Fitness trail should be completed as the use of the old road along the perimeter fence by pedestrians has led to an increase in noise impacts to local residents.	A fitness trail for Federal employees is currently in progress. The impacts of this trail are assessed in Section 3.16.
Economic Impacts	The proposed action should provide an incentive for eateries and restaurants to locate in the area.	Economic impacts are assessed in Section 3.10.
	The proposed action is a driver for economic development in eastern Montgomery County.	Comment noted. Economic impacts are assessed in Section 3.10.
Transportation	Cumulative traffic impacts would occur with the expansion of FDA and VIVA White Oak.	Traffic generated by area development has been included in the transportation analysis in Section 3.13.
	Would like to see employees charged for parking as an incentive to carpool and/or use mass transit.	FDA employees are provided many incentives to carpool and/or use mass transit. See Section 3.14.
	Impact on traffic would be increasingly worse and intersections are already failing.	Traffic impacts are assessed in Section 3.13.

Need to provide greater east/west access from the White Oak Science Gateway Community to New Hampshire Avenue.

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

7.3 2018 Master Plan Draft EIS, Public Review Period, and Public Hearing

A Notice of Availability (NOA) of the Draft EIS was published in the *Federal Register* on March 2, 2018. Methods similar to those used during the scoping period were used to notify the public and agencies for the public review period for the Draft EIS, including a mailing of a notification letter regarding the availability of the Draft EIS to 35 interested parties. The Draft EIS was distributed to 120 Federal, State, and local agencies having jurisdiction by law or special subject matter expertise and to any person, organization, stakeholder group, or agency that had expressed interest in reviewing the Draft EIS during the scoping process.

A public hearing on the Draft EIS was held during the public comment period on March 22, 2018, at the CHI Center in Silver Spring, Maryland to offer a forum for providing information on the environmental, cultural, and socioeconomic impacts as a result of the 2018 Master Plan to the public and agencies. It also provided a forum for receiving comments. The Draft EIS was made available in three reading locations. Notices for the hearing were published in the *Federal Register* and in the *Prince George's* and *Montgomery Sentinels* and *The Washington Post*.

As required, individuals and agencies were provided 45 days to review the Draft EIS. The comment period ended on April 16, 2018.

7.4 2018 Master Plan Final EIS, Public Review Period, and Public Hearing

A NOA of the Final EIS was published in the *Federal Register* on September 14, 2018, opening a 30-day public review period that ended on October 14, 2018. Methods similar to those used during the Scoping Period and Draft EIS were used to notify the public and agencies of the public review period for the Final EIS including mailing a notification letter regarding the availability of the Final EIS to 35 potentially interested parties. An additional 114 agencies, organizations and individuals were notified by letter. The Final EIS was made available in three reading locations. The availability of the Final EIS was

announced in the *Prince George's* and *Montgomery Sentinels* and *The Washington Post*. Issues raised through comments received on the Final EIS and responses for those issues are provided in **Appendix B**.

7.5 Consultation with Agencies, Organizations, and Affected Persons

7.5.1 General Consultation

Throughout the project planning for the 2018 Master Plan, GSA sought input from Federal, State, and local agencies, stakeholders, and Consulting Parties regarding the 2018 Master Plan and ways to avoid or minimize adverse effects. **Table 4** provides a list of the meetings held with Federal, State, and local agencies during the development of the 2018 Master Plan and EIS. Consultation has also taken place with the following:

U.S. Fish and Wildlife Service (USFWS),	Montgomery County Department of Economic Development,
Maryland Department of Natural Resources (MDNR),	Montgomery County Department of General Services,
Maryland Department of Environment (MDE),	Montgomery County Ride-On, and
Prince George's County Department of Public Works and Transportation,	Washington Metropolitan Transportation Authority (WMATA).
Montgomery County Department of Transportation,	

Table 4. Public Outreach/Coordination Meetings

Meeting Date	Organization
February 15, 2017	Early coordination meeting with National Capital Planning Commission (NCPC)
February 27, 2017	Informational Scoping meeting with M-NCPPC – Montgomery & Prince George's counties
July 27, 2017	Informational Meeting/Tour of FRC with NCPC
August 28, 2017	Informational Meeting/Tour of FRC with NCPC, M-NCPPC – Montgomery & Prince George's counties, Maryland Historical Trust (MHT), Advisory Council on Historic Preservation (ACHP)
September 1, 2017	Informational Meeting with Labquest
September 12, 2017	Scoping Meeting
September 21, 2017	Master Plan Briefing Meeting with Montgomery County Executive staff

October 5, 2017	Informational Briefing – NCPC
October 11, 2017	Informational Meeting with Hillandale & North White Oak Citizens Associations
October 14, 2017	Consulting Party Meeting 1
December 7, 2017	Master Plan update meeting with NCPC
January 22, 2018	Master plan update meeting with M-NCPPC – Montgomery County
January 23, 2018	Meeting with Montgomery County – BRT/Purple Line update
February 21, 2018	Meeting Maryland Department of Transportation, State Highway Administration (MDOT SHA)
February 22, 2018	Public Hearing presentation to Montgomery County on Draft Master Plan
March 22, 2018	Public Hearing on EIS
April 4, 2018	Consulting Party Meeting 2
May 16, 2018	Public Hearing Presentation to Montgomery & Prince George’s counties on Draft MP
May 21, 2018	Consulting Party 3
June 7, 2018	NCPC Draft Master Plan Approval Hearing

7.5.2 Section 106 Consultation

GSA has consulted with various stakeholder agencies and organizations pursuant to Section 106 of the National Historic Preservation Act (NHPA) which requires Federal agencies to afford Consulting Parties a reasonable opportunity to comment. If the evaluation of an undertaking’s impacts results in a finding of adverse effect a historic property, the proponent Federal agency will continue consultations to address those effects. A Memorandum of Agreement (MOA) with the State Historic Preservation Office (SHPO), also known as the Maryland Historical Trust (MHT), and the Advisory Council on Historic Preservation (ACHP) was completed in 2000. The MOA provided for the retention of contributing resources including the green buffer zone/historic golf course, portions of the Main Administration building (now Building 1), the flagpole with a redesigned and relocated circle in front of Building 1, and the historic fire station which is now part of Building 100. In addition, the MOA provided for recordation requirements for historic structures throughout the FRC. An amended MOA was executed in 2002, following an updated master plan, to permit modification of Building 1 for use by the FDA. Under the 2002 MOA, GSA, MHT and other signatories established compatibility standards for future development at the FRC that have

been adhered to throughout subsequent master plans. In 2003, a separate MOA was established with MHT for the demolition of structures in the 300 and 600 areas of the FRC.

The 2002 MOA encompassed work planned to design and build Phases I and II and to design Phase III of a five-phase consolidation of FDA laboratory and office space as well as subsequent phases of the project from 2002 through completion. It was understood that the 2002 amended MOA would remain in effect until it was terminated, or a new MOA was negotiated. Because this is a new Master Plan, GSA closed out the existing 2002 amended MOA.

In connection with the 2018 Master Plan, GSA has been consulting with the ACHP, the MHT, and other Consulting Parties under Section 106 of the NHPA. GSA participated in ongoing consultation under the NHPA Section 106 process with numerous agencies and organizations, including the following:

Advisory County on Historic Preservation	Montgomery County Planning Department
Air Force Arnold Engineering Development Center	Montgomery County Historic Preservation Office
Greater Colesville Citizens Association	North White Oak Civic Association
Hillandale Citizens Association	National Capital Planning Commission
Labquest	U.S. Army Research Laboratory
Maryland Commission on Indian Affairs	White Oak Laboratory Alumni Association
Maryland Historical Trust	

A Section 106 Memorandum of Agreement (MOA) has been signed by the GSA, the MD State Historic Preservation Office, and FDA to govern work to be carried out under the new 2018 Master Plan.

8. Mitigation Measures Related to the Preferred Alternative

Under NEPA, appropriate mitigation measures that have not already been included in the proposed action or alternative should be addressed. As required by 40 CFR 1508.20, mitigation measures recommended to be implemented as part of the 2018 Master Plan (per 40 CFR 1505.2(c)) and BMPs required to maintain compliance with Federal and local environmental laws and regulations are presented in the following sections. All practicable means of avoiding or minimizing environmental harm from the Preferred Alternative were adopted through the following program of mitigation, monitoring, and enforcement. It should be noted that because this is a long-term Master Plan, the mitigation outlined below will occur over a period of time as the phases of the Master Plan are implemented.

8.1 Noise

Construction will take place during normal daytime hours and will be in accordance with the Montgomery County Noise Ordinance.

8.2 Soils, Topography, and Geology

- During construction, BMPs such as silt fencing, erosion matting, inlet protection, sediment traps, sediment basins, and revegetation of exposed sediment will be implemented to minimize soil erosion and sedimentation.
- Erosion and sediment control plans will be prepared and submitted to MDE for review and approval prior to construction.
- All disturbed areas will be permanently revegetated and stabilized following construction.
- Construction in areas with steep slopes will be avoided, if possible.
- Detailed subsurface engineering studies will be undertaken prior to design and construction to ensure that sound building practices are followed.
- Soil suitability will be determined, and appropriate building foundation specifications will be developed.

8.3 Surface Water and Wetlands

- During construction, BMPs such as silt fencing, erosion matting, inlet protection, sediment traps, sediment basins, and revegetation of exposed sediment will be implemented to minimize soil erosion and stormwater pollution.
- Stormwater management plans and erosion and sediment control plans will be prepared and submitted to MDE for review and approval prior to construction. All disturbed areas will be permanently revegetated and stabilized following construction.
- Temporary impacts to streams and wetlands will be restored to pre-construction conditions to the maximum extent practicable following construction, including contour and elevation restoration, revegetation with native species, streambank stabilization, and stream substrate replacement.
- GSA will obtain authorization under Maryland State Programmatic General Permit – 5 (MDSPGP-5). Compensatory mitigation will be provided at a minimum 1:1 ratio for stream impacts exceeding 200 linear feet.
- All proposed encroachments to stream valley buffers (SVBs) will be designed in accordance with the M-NCPPC Environmental Guidelines to the maximum extent practicable. M-NCPPC will be consulted prior to final design to determine appropriate compensatory mitigation for impacts to SVBs, which

could include buffer averaging, enhanced forestation, bioengineering practices, and other environmentally beneficial techniques.

- Environmental site design/low impact design (ESD/LID) strategies will be used, including, but not limited to:
 - possible use of micro-bioretenion (structural walled micro-bioretenion in lieu of graded micro-bioretenion where space limitations dictate);
 - bioswales along roadsides; rooftop rainwater harvesting; green roofs;
 - pervious pavements;
 - submerged gravel wetlands;
 - tree planting; and,
 - stream restoration.

8.4 Vegetation

- Construction activities will be limited to areas that are to be cleared for structural components.
- Areas that are not to be developed will not be used for equipment parking and other construction related activities unless no other alternatives are feasible.
- BMPs for tree protection, including tree protection fencing and root pruning for trees with critical root zones, will be implemented.
- A Forest Management Plan/Tree Conservation Plan will be developed.
- Invasive species on the site will be removed and controlled.
- Native species will be in landscaped areas and areas to be revegetated that will also increase pollinator habitat.

8.5 Wildlife

- Areas of forest will be maintained to provide habitat and movement corridors for wildlife.
- Signage for deer crossing will be placed along the roadway throughout the FRC to mitigate for the risk of deer being struck by vehicles.
- Erosion and sediment control plans will be prepared and submitted to MDE for review and approval prior to construction.

- To protect aquatic species in Use III waters, no instream work will be conducted between October 1st and April 30th.

8.6 Air Quality, Climate Change and Energy Consumption

- Encourage employees to use public transportation, carpools, vanpools, and bicycle to work.
- Use alternative clean fuels and non-polluting sources of energy.
- Encourage use of green building materials, construction methods, and building designs.
- Maintain construction equipment to reduce emissions.
- Cover or wet exposed soils during construction.
- If it is determined at a later time, during implementation of the Master Plan, that the Central Utility Plant (CUP) will need to be expanded to provide electricity to the additional buildings, as opposed to tying into the PEPCO electrical grid, a new air quality analysis will be undertaken at that time to assess the impacts of a new Central Utility Plant.
- GSA will continue to implement its annual sustainability goals, including greenhouse gas reduction through improving building energy efficiency and installing advanced and renewable energy technologies.

8.7 Safety and Security

- A health and safety plan will be implemented to protect construction workers from construction site hazards and contamination. Employees and visitors will not have access to construction zones.

8.8 Cultural Resources

- GSA will re-evaluate the boundaries of the Naval Ordnance Laboratory (NOL) Historic District in light of the cumulative effects of approved undertakings under previous MOAs (2002 and 2003), including the evaluation of the contributing status of individual buildings, structures, sites, objects, and landscapes. The re-evaluation shall take place in consultation with the SHPO.
- Within six (6) years of the effective date of the Memorandum of Agreement, GSA will submit to the SHPO a determination of eligibility (DOE) form for the re-evaluation of the NOL Historic District. The DOE must be accompanied by supporting materials as described in *General Guidelines for Compliance-Generated Determinations of Eligibility and Standards and Guidelines for Architectural and Historical Investigations in Maryland*.
- If the NOL Historic District or portions of the NOL Historic District is deemed to retain eligibility, GSA shall nominate the re-evaluated NOL Historic District, or portions of the district as agreed to by GSA and SHPO, for listing in the National Register of Historic Places.

8.9 Utilities

- One of the following options will be implemented in coordination with the Washington Suburban Sanitation Commission:
 - Replacement of approximately 4,850 feet of downstream sewer trunk lines to accommodate the additional flow; or
 - In lieu of replacing the downstream pipe, GSA and FDA will develop a mitigation plan with WSSC to rehabilitate existing manholes and pipes on the Paint Branch sewer system (on and off the FRC) to remove excess inflow/infiltration (Clearwater) from the downstream. The exact number of manholes and pipes to be replaced will be determined during the development of the mitigation plan.
- The following water and energy conservation strategies will be used: water-efficient landscaping, low-flow plumbing fixtures, rooftop rainwater harvesting, rooftop solar panels, active and passive solar techniques, high-efficiency lighting and occupancy sensors, modern and efficient heating and cooling equipment, natural ventilation systems, and ENERGY STAR® appliances.
- LEED® Gold certification and net-zero energy and water usage will be achieved for all new buildings.

8.10 Waste Management

- New buildings on the FDA Campus will be a minimum LEED® Gold certified.
- At least 50 percent of construction and demolition waste will be diverted from landfills during construction.
- Building materials, products, and supplies will be reused or recycled to the maximum extent practicable.
- Waste collection, recycling, and composting programs implemented by GSA will continue.
- At least 50 percent of non-hazardous waste will be diverted from landfills through reuse, recycling, and composting.
- To promote waste minimization and pollution prevention, the FDA Campus will follow GSA's Green Purchasing Plan, which requires the purchase of products and materials that are bio-based, non-ozone depleting, energy efficient, water efficient, contain recycled content, and are non-toxic or less toxic alternatives.

8.11 Traffic and Transportation

Based upon the results of the Transportation Technical Report (2018 Master Plan EIS, Appendix G) GSA/FDA will undertake the following mitigation measures:

- GSA/FDA will expand the commuter shuttle system to include direct shuttle service to and from transit facilities in areas with higher concentrations of employee residences along the I-270 corridor.
- GSA/FDA will coordinate with Montgomery County to optimize cycle, phase lengths, and offsets at the following intersections:

- New Hampshire Avenue (MD 650) and Schindler Drive/Mahan Road
- New Hampshire Avenue (MD 650) and Northwest Drive/Michelson Road
- New Hampshire Avenue (MD 650) and Lockwood Drive
- Cherry Hill Road and FDA Boulevard
- GSA will be responsible for restriping westbound Mahan Road to provide two left-turn lanes, a shared through-right, and a right-turn lane. A pedestrian-actuated phase will be implemented for pedestrians wishing to cross New Hampshire Avenue.
- GSA will be responsible for restriping eastbound Mahan Road at the intersection with Northwest/Southwest Loop Road to provide one left-turn lane, one shared through/right-turn lane and one free-flow right-turn lane.
- GSA will be responsible for adding a separate right-turn lane on northbound NW Loop Road at the intersection with Michelson Road.
- GSA will be responsible for providing two right-turn lanes on westbound Michelson Road at New Hampshire Avenue. The right-turn will be overlapped with the southbound left-turn movement and the curb lane will be permitted to turn right on red. A pedestrian-actuated phase will be implemented for pedestrians wishing to cross New Hampshire Avenue.
- GSA will be responsible for posting a "No Thru Traffic" sign to avoid cut-through traffic from the FRC via Northwest Drive.
- GSA will be responsible for enhancing the existing Transportation Demand Management (TDM) program in the Transportation Management Plan (TMP) to encourage more employees to commute via modes other than driving alone.

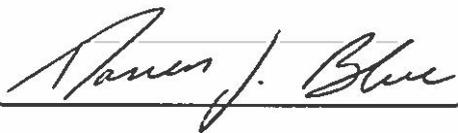
8.12 Mitigation Measures Outside the Jurisdiction of GSA

Major roadway improvements will be required at some of the intersections to bring them to acceptable levels of service under the Selected Alternative. GSA will coordinate with the MDOT SHA and Montgomery and Prince George's Counties to determine how and when the State and the counties should adopt the mitigation measures without jeopardizing ongoing or future projects in the counties.

GSA will coordinate with Montgomery County to create a Memorandum of Understanding (MOU) with Montgomery County to consider roadway improvements near the campus; public transit connections; park-and-ride facilities near major interchanges within the vicinity of the campus; and, explore possible public access and public amenities that are consistent with the mission and security requirements of the FDA Campus. The specific terms of the MOU will be outlined at that time.

9. Record of Decision Approval

This ROD documents the specific components of my decision and the rationale for my decision of Alternative C as the Preferred Alternative. This decision is based on information and analyses contained in the 2018 FDA Master Plan Draft EIS issued in March 2018; the 2018 FDA Master Plan Final EIS issued in September 2018; the Section 106 MOA executed by GSA, the M.D. State Historic Preservation Office, and the FDA, and the comments of the Federal and State agencies, stakeholder organizations, members of the public, and elected officials, and other information in the Administrative Record.

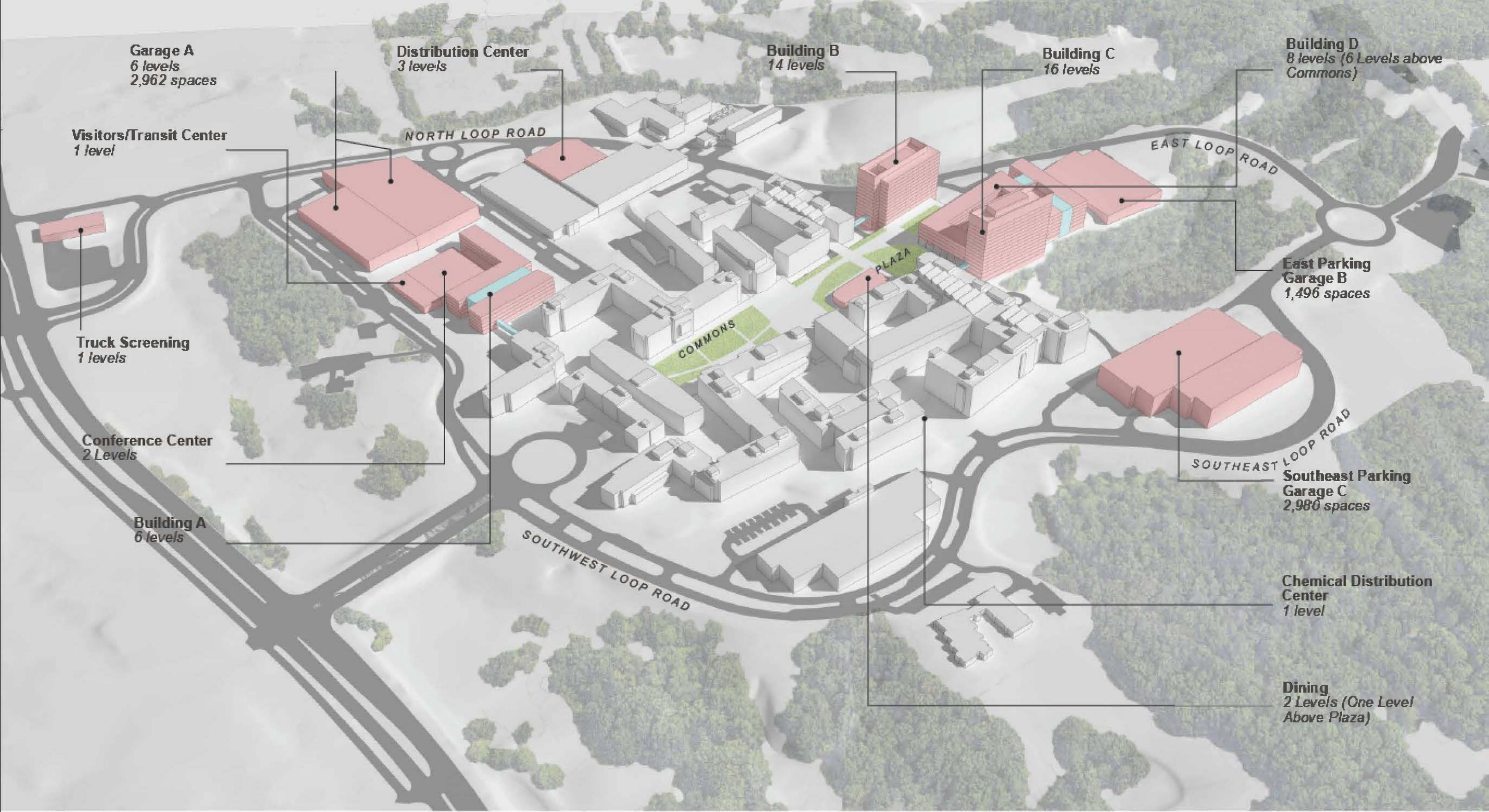


Darren J. Blue
Regional Commissioner
Public Buildings Service
U.S. General Services Administration

14 Nov 2018

Date

Appendix A: Preferred Alternative Figure



Garage A
6 levels
2,962 spaces

Distribution Center
3 levels

Building B
14 levels

Building C
16 levels

Building D
8 levels (6 Levels above
Commons)

Visitors/Transit Center
1 level

NORTH LOOP ROAD

EAST LOOP ROAD

**East Parking
Garage B**
1,496 spaces

Truck Screening
1 levels

PLAZA

COMMONS

Conference Center
2 Levels

SOUTHEAST LOOP ROAD

**Southeast Parking
Garage C**
2,980 spaces

Building A
6 levels

SOUTHWEST LOOP ROAD

**Chemical Distribution
Center**
1 level

Dining
2 Levels (One Level
Above Plaza)

Appendix B: Responses to Comments on the Final EIS for the 2018 Master Plan for the Consolidation of the U.S. FDA Headquarters at the Federal Research Center at White Oak

2018 Master Plan for the Consolidation of the FDA Headquarters at the FRC at White Oak
Final EIS Comments and Responses
October 2018

	Commenter	Comment	Response
1	EPA	As the project moves forward, a functional assessment of water resources impacted by the project could provide useful information for selecting the appropriate types of compensatory mitigation. It is recommended that on-site mitigation options be considered. Lastly, redundant stormwater management practices may be implemented during clearing, grading, and construction associated with the project in order to minimize impacts to water resources to the greatest extent practicable.	Comment Noted. GSA will continue to assess stormwater management mitigation in accordance with Federal and State laws as the project is implemented.
2	NCPC	At its June 2017 meeting, the Commission supported Alternative C because it resulted in a balanced approach that generated the least amount of adverse environmental impacts, extended the original character and urban design framework of the FDA campus, minimized adverse effects to its historic setting, and responded to the surrounding context. Since the Draft EIS, GSA has refined Alternative C massing to respond to comments from the Commission and other stakeholders. Staff finds that the massing refinements have improved the historic view and symmetry of Building 1 from New Hampshire Avenue, and opened the view toward the forested area to the east of the FRC from 72 to 135 feet. Staff continues to find that Alternative C best meets the project's purpose and need.	Comment Noted.
3	NCPC	In addition, we find that Alternative C is also the environmentally preferred alternative when compared to the other two action alternatives. Alternative C causes the least damage to the environment and best protects, preserves, and enhances historic, cultural, and natural resources. As shown in the table below, Alternative C will result in the least amount of clearing, grading and excavation; impervious cover; and vegetation clearing.	Comment Noted.
4	NCPC	In general, GSA has addressed the majority of our comments from the Draft EIS review, including program, wildlife, land use planning and zoning, and cultural resources. In particular, the action alternatives provide a more consistent program, which makes the environmental impacts and the trade-offs of building up versus building out more apparent.	Comment Noted.
5	NCPC	The action alternatives include a total of 11,615 parking spaces distributed in three parking garages (Northwest Parking Garage A, East Parking Garage B, and Southeast Parking Garage C): 10,000 parking spaces for employees and support staff; and 1,615 spaces for visitors. The traffic and transportation analysis included in the EIS indicate that 15 of the 27 study area intersections would operate at an overall level of service E or F (failing condition) in one or more peak hours. Given the site's unique environmental constraints, and impacts to traffic and transportation, we continue to have concerns about the proposed number of parking and reiterate the Commission's findings and recommendations from its June 2018 review. In particular, we find that the proposed "East Parking Garage B," with 1,496 spaces encroaches on the stream valley buffer and requires a significant amount of vegetation clearing. As such, we recommend reducing the footprint and number of parking spaces to minimize environmental impacts and achieve a 1 :2 parking ratio.	Comment Noted.

	Commenter	Comment	Response																											
6	NCPC	As mentioned in the June 2017 Commission Action, 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. Due to traffic impacts, the Commission encouraged FDA to set a long-term goal of one parking space for every two employees (1 :2) by the end of construction in 2035, limiting the number of employee parking spaces to 9,000. The Commission deferred support for the proposed footprint and number of parking spaces for Garage B (to be built in Phase 4) until GSA was able to evaluate improvements to the local/regional network and an update of the Transportation Management Plan (TMP) closer to the time of design and construction.	Comment Noted. GSA acknowledges NCPC's desire for GSA/FDA to reach a long-term goal of one parking space for every two employees.																											
7	NCPC	The 2018 Master Plan indicates that Parking Garage B has been reduced since the Draft EIS to accommodate the increased footprint of the adjacent office space (Building D), but also to minimize the impact to the tree canopy. We recommend comparing the size, parking capacity, and environmental impacts of the previous and current garage footprint. For example, it will be helpful to identify the difference in square footage and parking capacity between the previous and current layout, and describe how the parking garage footprint included in the Draft and Final EIS impact vegetation clearing and stream valley buffer disturbance (provide areas in acres).	<p>There is a 29 percent reduction from the Draft EIS to the Final EIS in the building footprint of Parking Garage B.</p> <table border="1" data-bbox="1734 572 2175 782"> <thead> <tr> <th>Parking Garage B</th> <th>Draft EIS</th> <th>Final EIS</th> </tr> </thead> <tbody> <tr> <td>Spaces</td> <td>1,794</td> <td>1,496</td> </tr> <tr> <td>Levels</td> <td>6</td> <td>7</td> </tr> <tr> <td>Space/Level</td> <td>299</td> <td>214</td> </tr> <tr> <td>SF/Car</td> <td>340</td> <td>340</td> </tr> <tr> <td>Footprint SF</td> <td>101,660</td> <td>72,663</td> </tr> </tbody> </table> <table border="1" data-bbox="1734 822 2128 923"> <thead> <tr> <th>Alternative C</th> <th>Draft EIS</th> <th>Final EIS</th> </tr> </thead> <tbody> <tr> <td>SVB</td> <td>0.017 ac</td> <td>1.219 ac</td> </tr> <tr> <td>Forest</td> <td>1.92 ac</td> <td>1.31 ac</td> </tr> </tbody> </table>	Parking Garage B	Draft EIS	Final EIS	Spaces	1,794	1,496	Levels	6	7	Space/Level	299	214	SF/Car	340	340	Footprint SF	101,660	72,663	Alternative C	Draft EIS	Final EIS	SVB	0.017 ac	1.219 ac	Forest	1.92 ac	1.31 ac
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8	NCPC	Lastly, the Comprehensive Plan for the National Capital tree replacement requirements listed in page 96 of the 2018 Master Plan (lines 4 7-56) are incorrect. The Federal Environment Element states that "significant trees (diameter greater than 10 inch) will be replaced at a rate derived from a formula of the International Society of Arboriculture, or as established by the local jurisdiction's requirements for tree replacement." As such, GSA should replace trees at a rate established by the local jurisdiction's requirements for tree replacement. In this case, GSA should complete a Forest Conservation Plan (FCP) in accordance with the Maryland Forest Conservation Act, and the Montgomery County Planning Department Environmental Guidelines.	Comment Noted.																											
9	USFWS	Please go to the following website to determine if federally endangered and/or threatened species within the Maryland, Delaware and Washington D.C. region have the potential to be impact by your proposed project.	Coordination was conducted with the U.S. Fish & Wildlife Service A review of the USFWS' Information for Planning and Consultation (IPaC) website determined that there are no federally listed threatened or endangered within the study area.																											
10	Maryland Department of Planning	We have forwarded your project to the following agencies and/or jurisdictions for their review and comments: the Maryland Departments of Natural Resources, Environment, Transportation, General Services; Montgomery County; and the Maryland Department of Planning including the Maryland Historical Trust. A composite review and recommendation letter will be sent to you by the reply due date. Your project has been assigned a unique State Application Identifier that you should use on all documents and correspondence. Please be assured that we will expeditiously process your project.	Comment Noted.																											

	Commenter	Comment	Response
11	Montgomery County Planning	<p>The Final EIS for the proposed FDA expansion includes a Transportation Management Plan (TMP), which states that 15 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, Montgomery County strongly recommends that, if the proposed expansion of the FDA happens, the federal government should provide significant contributions to mitigate traffic congestion, particularly for the following major transportation projects:</p> <ul style="list-style-type: none"> • 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. 	<p>The impacts of the BRT and the Transit Station are discussed in greater detail in the TMP (2018 Master Plan Final EIS Appendix H). The impact of the BRT is accounted for in the trip reduction credits assumed in the traffic study (2018 Master Plan Final EIS Appendix G). The TMP text has (Appendix H) has been revised to discuss possible connection to the White Oak Center and bike sharing efforts.</p>
12	Montgomery County Planning	<p>The FDA consolidation and expansion project is not subject to the County's transportation fees and programs, therefore, federal funding and a continuous commitment from the GSA/FDA will be essential to ensure that capital needs are met, including the implementation and construction of the BRT. The Montgomery County Planning Board and the MCDOT agree that federal participation, particularly funding for BRT on New Hampshire Avenue, is essential to ensure that FDA's growth does not outpace and overwhelm the area's transportation network.</p>	<p>Comment Noted.</p>
13	Montgomery County Planning	<p>The WOSG Master Plan recommends a "Connection to FDA" between the White Oak Center and FDA's campus, near New Hampshire Avenue and Lockwood Drive. 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.</p>	<p>Comment Noted.</p>
14	Montgomery County Planning	<p>We support a vehicular connection in this location to improve transportation access in the White Oak Center, as suggested by the MC DOT in their April 16, 2018 letter to the GSA on the Draft EIS. This would be a major improvement to connectivity in the area, enhancing access to the White Oak Transit Center. The FDA should coordinate with the MCDOT to facilitate the creation of this connection. We raised this issue in our April 13, 2018 letter and your response was that "a connection to the White Oak Center is not part of this Master Plan and therefore, has not been analyzed in the EIS." Your response also stated that the "GSA will continue to work with Montgomery County to explore access and joint/shared use options that are compatible with the security requirements of the FDA campus," which we appreciate. You also noted that the TMP text in Appendix H has been revised to discuss the connection to the White Oak Center, as well as bike sharing efforts.</p>	<p>Comment Noted.</p>
15	Montgomery County Planning	<p>The TMP in the Final 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. The FDA should coordinate the design and future connections with the Planning Department. The Final EIS should identify the proposed location of the multi-use path and should align with the final Bicycle Master Plan, which is expected to be approved by the County Council in the fall of 2018. In response to our previous comments, the GSA has stated that the FDA will continue to coordinate with the County on potential pedestrian and bicycle connections. We appreciate that the GSA, through its Urban Planning and Good Neighbor Program, is committed to exploring ways to provide public access, within the security limitations of the federal facility.</p>	<p>Comment Noted.</p>
16	Montgomery County Planning	<p>Other [bicycle and pedestrian] improvements should include the following:</p> <ul style="list-style-type: none"> • 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. 	<p>The mitigation that GSA/FDA has committed to can be found in the Record of Decision.</p>

	Commenter	Comment	Response
17	Montgomery County Planning	Currently, there are 6,817 parking spaces for 10,987 employees on the FDA campus, which is approximately 1 space for every 1.6 employees. 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, which is approximately 1 space for every 1.4 employees. We understand the FDA's position that the parking ratio should accurately reflect and accommodate the total amount of employees that could possibly come to the FDA campus on any given weekday. However, as teleworking trends and options continue to increase regionally, and to support the goals of reducing single occupancy vehicle trips and increasing transit ridership, we encourage the GSA/FDA to consider a ratio of 1 parking space per 2 employees. At a minimum, the proposed parking in the Final 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.	Comment Noted. The FDA Master Plan follows the federal facility parking ratio policies established in the NCPC Comprehensive Plan. The parking ratio will be 1 space for every 1.8 employees.
18	Montgomery County Planning	While the White Oak area is not currently served by high-capacity transit, BRT is planned in the near-term along Colesville Road/US 29 and in the long-term along New Hampshire Avenue. We appreciate the TDM programs that the FDA has utilized on the campus to date and expect that a similarly robust program will be in place in the future to support the potential expansion of the campus. As stated in your response, "FDA will be using a robust TOM plan to achieve an NADMS goal of 46%," which we appreciate.	Comment noted.
19	Montgomery County Planning	The 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 Final EIS, however, the 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.	Comment noted.
20	Montgomery County Planning	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 should not be located within the stream-valley buffer. We appreciate your response to these comments and understand that site constraints are challenging but reiterate that stormwater facilities and discharge should not be placed adjacent to or within stream valley buffers, to the greatest extent practicable.	Comment noted.
21	Montgomery County Planning	There will be a loss of forest and we understand that specific locations for mitigation will be determined at the time of development. However, given the location of the proposed new development, our first preference for mitigation would be planting forest on steep slopes in stream valley buffers.	Comment noted.
22	Montgomery County Planning	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.	Comment noted.

	Commenter	Comment	Response
23	Montgomery County Planning	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. 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). 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.	Comment noted.
24	Montgomery County Planning	When the Montgomery County Planning Board reviewed the FDA Mandatory Referral on May 3, 2018, they understood the Section 106 review process, but the Board does not want to limit potential options for recreational opportunities within the buffer. The Planning Board is also aware that a stream runs through the green buffer area. The Board emphasized that when the MOA is revised, they do not want to constrain the Department of Parks from asking for something more ambitious in the buffer area, or adjacent to Hillandale Local Park, that would allow for increased recreational opportunities, as noted below. The Planning Board supports maximizing access of this space if, at some future point, the GSA/FDA will accommodate recreational use of this area. In the M-NCPPC's letter to the GSA (dated May 22, 2018), the Commissioners agreed 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 encourages coordination of recreational efforts with the Montgomery County Department of Parks.	Comment noted.
25	Montgomery County Planning	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. (Page 89 of the WOSG Plan.) The Parks Department would like to work with the GSA to explore opportunities to expand recreation amenities at the park, without impacting the historic green buffer along New Hampshire Avenue. Since active recreational opportunities appear to be limited on the FDA campus, and Hillandale Local Park is scheduled for renovation, this WOSG Master Plan recommendation should be pursued.	Comment noted.
26	Montgomery County Planning	Regarding 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.	Comment noted.
27	Montgomery County Planning	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 Final EIS: erosion sediment control plan, subsurface engineering studies, stormwater management plans submitted to the Maryland Department of the Environment (MOE) prior to construction, and forest management/tree conservation management plans.	Comment noted.
28	Montgomery County Planning	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.	Comment noted.
29	Montgomery County Planning	Further archeological investigation will be required if there is going to be an impact in the Secondary Areas of Potential Effect. Previous archaeological investigations cover the Primary Area of Potential Effect. The Secondary Areas of Potential Effect include proposed parkland. If any of the FRC proposed alternatives requires ground disturbing activities (stream restoration, utilities) on adjoining parks, an assessment to evaluate the impact to potential archaeological resources is recommended.	Comment noted.

	Commenter	Comment	Response
30	Montgomery County Planning	We understand that a Record of Decision will be signed by the GSA Regional Commissioner that will outline the mitigation that the GSNFDA will be responsible for carrying out for the proposed FDA campus expansion. The Planning Department would also like the GSA/FDA to consider a Memorandum of Understanding (MOU) with the County that includes the mitigation recommendations outlined in this letter as well as the potential strategies going forward.	GSA will enter into a MOU with Montgomery County.
31	Montgomery County Planning	Specific Planning Board comments have been reflected throughout this letter, but it is important to conclude with a summary of the Board's concerns. 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 NCPC's role in determining the final ratio for the FDA campus. The M-NCPPC looks forward to working with the GSA on the implementation of Bus Rapid Transit on New Hampshire Avenue and US 29. The Commission also requests that the 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.	Comment noted.
32	Montgomery County Fire & Rescue	<ul style="list-style-type: none"> Page 14, Section 1.6.2, 3rd paragraph, 2nd sentence: Suggest referring to the fire station located in Building 1 as the "historic fire station" to be consistent with how the former, on-site fire station facility is referenced elsewhere in the document (e.g., p. 152). This will clarify that the fire station within Building 1 is no longer operational. 	The EIS has been changed to the following: The MOA provides for the retention of contributing resources, including Building 1, the historic fire station portion of Building 100, and the flagpole with the redesigned circle to be located in front of Building 1.
33	Montgomery County Fire & Rescue	<ul style="list-style-type: none"> Page 21, Table 3, Community Services/ Amenities heading, 3rd column, 151 entry: Clarify to which "fire station" (i.e., Hillendale Station 12 or the historical fire station within Building 1) the pathway would be extended. 	The EIS has been changed to the following: No, there is not. The comment was investigated and there is not an agreement with the CHI Center. The Childcare center has an established evacuation plan that does not include the CHI Center.
34	Montgomery County Fire & Rescue	Page 140, Section 3.11.1, 1st paragraph, 4th sentence: Change "40 fire stations and two rescue stations" to "35 fire stations and two rescue stations." [MCFRS has Fire Stations #1-26, #28-35, and #40. Presently, there are no operational Fire Stations designated as #27, 36, 37, 38 or 39; therefore, we have 35 fire stations plus the two rescue stations.]	The EIS has been updated to reflect 35 fire stations.
35	Montgomery County Fire & Rescue	In the last sentence of the first paragraph, a period is missing following "(MCFRS, 2017b)." The latter portion of the last sentence in the first paragraph regarding Montgomery County Police would be more appropriately placed in the 2nd paragraph addressing police department services.	Comment noted.
36	Montgomery County DOT	<p>It will be important 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. We understand from the response to our comment on the previous draft that this information is in development.</p> <p>The White Oak 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.</p> <p>In these circumstances, and noting other needs such as the BRT and interchanges, 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. We suggest a payment-in-lieu of LATIP fees and/or that implementing agencies construct and implement necessary capital investments and programs.</p>	This is a planning-level study for a Master Plan. Therefore, the exact funding sources and implementation plan is not known. An order of magnitude cost is being prepared for the master plan that will include the off-site roadway improvements identified in the traffic report. Federal funding cannot be used for off-site roadway improvements.

	Commenter	Comment	Response
37	Montgomery County DOT	<p>The analysis does not conform to the methodologies outlined in the County's 2016 Subdivision Staging Policy, particularly regarding the vehicular thresholds as well as analysis of pedestrian, bicycle, and transit modes.</p> <p>With the analysis provided, several intersections continue to have levels of service of E or F even after mitigation, with conditions worsened under the Build Alternative versus the No Build. Furthermore, several intersections have other issues identified, including issues between pedestrians and right-turns and the need for a wider analysis in cases where cycle lengths are changed.</p> <p>Additional analysis remains necessary to ensure adequacy according to the Subdivision Staging Policy, and that any identified treatments are feasible to safely implement. Financial commitment will be necessary to implement these treatments as part of development of the FDA campus.</p>	<p>The TTR study area and scope was coordinated with all stakeholders, including Montgomery County, MDOT SHA, and Prince George's County during the EIS scoping process to develop a master-plan level assessment of potential transportation impacts and mitigation measures. The TTR generally follows the intent and requirements of the sub division staging policy. However, given that a area-wide transportation study was already conducted prior to the proposed master plan update, the TTR focuses on how the proposed campus expansion effects the study area intersections and recommendations in the White Oak LATR. Mitigation measures were chosen to compliment the improvements already recommended in the LATR to address deficiencies as outline in the subdivision staging policy thresholds, as well as to address needs that were identified in the analysis that should be addressed even if not specifically meeting a staging policy threshold. Furthermore, in most cases the recommended mitigation measures match No Action conditions.</p> <p>We are aware of the subdivision staging policy requirements for more detailed pedestrian, bicycle, and transit analysis and it is our opinion that the recommendations contain in the TTR and TMP for pedestrian, bicycle, and transit services and infrastructure are consistent with the ultimate goal of the analyses required in the subdivision staging policy. Given that this is a higher-level master planning effort, and that there are significant transit (BRT), pedestrian and bicycle projects proposed by the County, but with uncertain timelines, a detailed analysis of pedestrian, bicycle, and transit LOS would be difficult to accurately predict and would likely lead to any new recommendations. The focus was on how to integrate the site from a broader perspective rather than trying to predict individual intersection pedestrian operations, future bicycle comfort levels, or transit system loads in 2040. For example, the TMP and TTR recommends upgrades that are consistent with the intent of the subdivision staging policy such as upgrades to ADA ramps, crosswalks, and pedestrian signal heads at nearby intersections, coordination with the County to provide improved connections to regional bike and pedestrian facilities, improvements to on-campus amenities for these modes (bicycle paths, wider sidewalks, pump and tool station, bikeshare, etc.), connections to developments such as VIVA White Oak, an on-campus transit center, and improved FDA shuttle services to supplement public transit. All of which would likely be recommendations regardless of the results of a more detailed analysis.</p> <p>Furthermore, the impact of the proposed BRT and other regional pedestrian and bicycle facilities as well as future nearby developments may result in significant employee travel pattern changes. FDA has always been committed, and will remain committed, to working with the County and other stakeholder to implement strategies to reduce drive-alone mode share. Including the pedestrian, bicycle, and transit recommendations in the TMP will ensure that they are updated to reflect changing needs.</p>
38	Montgomery County DOT	<p>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.</p> <p>Using a ratio the is not reflective of actual daily usage will make it difficult to effectively implement the TMP and improve the non-auto driver mode share. The parking ratio should reflect the anticipated number of employees traveling to the site on a typical day.</p> <p>Phasing of the project also appears to be such that in some phases the ratio is significantly shifted as to provide a larger share of parking per employee. In addition, we request that FDA preserve the 1: 1.8 ratio through each phase of construction. If a phase should add a surplus of parking, we suggest that access to excess parking spaces be restricted as necessary to preserve the target ratio.</p>	<p>NCPC requires a parking ratio of between 1:1.5 (for sites outside of high-capacity transit) and 1:2.0 (for sites with high-capacity transit) for the FDA campus. A median figure of 1:1.8 was developed for the campus based on a sensitivity analysis as well as acknowledgement of the potential of the BRT. The ratio requires a 45% NADMS. The daily data which would indicate an effective ratio of 1:1.6 includes teleworking employees as well as employees assigned to the campus but that work in off-campus locations. Once consolidated it is anticipated that daily attendance ratios would increase (excluding the maintenance of teleworking as part of the TMP). It is our opinion that 45% is a reasonable NADMS goal given that the BRT, which would be the only high-capacity transit service would still require multi-seat rides for most employees. GSA/FDA is willing to consider closing off portions of constructed parking facilities in order to maintain the required ratio during construction.</p>

	Commenter	Comment	Response
39	Montgomery County DOT	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. We suggest that consideration be given toward straightening the perimeter road (shown below in red) such that the on-street bus stops (shown in green) can be shifted southward to be in front of Building 21, Building A, and the Conference/ Visitors/ Transit Center.	The location of the transit hub has been shifted to be located closer to Building 1. An external or periphery transit center combination with the White Oak transit center is not being considered at this time. However, GSA/FDA remains committed to working with the County to identify methods to connect the on-campus transit center with the White Oak Transit Center on Lockwood Drive.
40	Montgomery County DOT	<p>We strongly urge that the perimeter road be realigned as to allow a continuous through movement onto the Lockwood Connector, aligned along the east side of the storage facility property (shown below in green).</p> <p>Such an alignment would ease acquisition of right-of-way, and would also provide for ideal BRT operations. Buses could turn left from the connector into the Lockwood transit center, and from the transit center right onto the connector.</p> <p>An alignment through the middle of the self-storage facility (shown in red) could split the site into two difficult-to-develop lots, would require completely taking several other properties, and buses would arrive into the middle of the Lockwood transit center --rendering it difficult to locate how buses would serve the transit center. Such an alignment may be unlikely to ever be implemented.</p>	GSA/FDA is aware of the request and will work with Montgomery County to assess the feasibility of this connection. Adjustments would be made to the internal roadways if a connection is ultimately provided.
41	Montgomery County DOT	<p>While we appreciate the inclusion of language for Bikeshare at the campus entrance, we suggest that the plan more widely 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.</p> <p>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?</p> <p>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.</p> <p>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.</p> <p>Should it be infeasible to accommodate existing Bikeshare programs/services on-campus, consider a separate</p>	A bikeshare or scooter-share system is being considered on-campus. The details of the program will be refined outside of the master planning process. Bikeshare and/or dockless bikes are listed under the bike/walk to work category in the most current iteration of the TMP.
42	Woodmoor-Pinecrest Citizens Association	We are concerned that this data was not available to Montgomery County during their recent comprehensive planning and study of transportation for the area and the fact that the FDA additional expansion was not considered during the White Oak Science Gateway Master Plan process.	The current FDA expansion was not considered in the WOSG Master Plan. The WOSG Master Plan was completed in July 2014. Congress did to pass the FDA Reauthorization Act until 3017. The Reauthorization Act reauthorized the user fee programs for FDA. Due to these Congressional mandates, FDA determined there would need to be an increase in employees and campus support staff.
43	Woodmoor-Pinecrest Citizens Association	Generally we are concerned about the amount of impact on the surrounding transportation infrastructure, impact on utilities such as sewer and electric and impact on environmentally sensitive areas of the Paint Branch, particularly in light of the lack of stormwater management capacity.	Comment noted. GSA has identified mitigation measures for impacts in the ROD.
44	Woodmoor-Pinecrest Citizens Association	We would also like GSA to consider opening a public road as an outlet from the VIVA White Oak project to either Lockwood Drive or New Hampshire Avenue.	Comment noted.

	Commenter	Comment	Response
45	Global Lifesci Development Group	<p>The GSA's 2018 Final EIS fulfills two essential mandates from Congress. First, from the very beginning of process of consolidating the FDA HQ --- which was previously located in more than forty different outdated buildings inefficiently scattered across the Washington Capital Region --- Congress made clear its bi-partisan/non-partisan support to consolidate the FDA Headquarters operation in White Oak, with new state-of-the-art laboratory equipment and facilities, to: (a) create greater efficiencies for FDA's health innovation mission; (b) speed up FDA's decision-making processes relating to the safety and efficacy of medical devices, drugs, vaccines, and other health initiatives; and (c) be most cost-effective for the federal taxpayers and the nation's consumers. Specifically, in 1996, Congress noted that it "strongly supports the consolidation of FDA facilities at White Oak, Maryland" (Sen. Rep 104-284) and that, according to Congress, consolidating the FDA in White Oak would enable the FDA to "do its job faster and more efficiently, benefiting the taxpayer and the consumer." (Sen. Rep 104-284). Second, when Congress gave its direction to review and update the FDA HQ Master Plan in 2016, Congress specifically recommended that GSA consider the "land inside and contiguous to the [existing FDA] White Oak campus" (Congressional Consolidated Appropriation Act of 2016, Public Law 114-113, Division A, Explanatory Statement at p. 30). The GSA, therefore, should be commended for all its tireless efforts to fulfill these two fundamental Congressional mandates.</p>	Comment noted.
46	Global Lifesci Development Group	<p>Up until the time of this 2018 Master Plan update, the GSA and FDA have faithfully preserved the designated Historic Building 1 view-shed, by not placing any buildings on the White Oak campus that would be visible from New Hampshire Avenue above the roof top of the Historic Building 1. The GSA's preferred Alternative C proposed in the 2018 Final EIS, however, is not faithful to the original commitment to preserve the view-shed of the designated Historic Building 1. While the GSA's selected Alternative C has lower building heights than the other Alternatives A and B, the proposed buildings under Alternative C will still be visible over the view-shed from New Hampshire Avenue to Historic Building 1.</p>	Comment noted. As noted on page 37 of the Final EIS, BSA studied additional development areas within the FRC. These development areas were dismissed from further analysis because they did not fully meet the purpose and need for a Master Plan and do not fully meet the goals and aspirations of the FDA Master Plan.
47	Global Lifesci Development Group	<p>By way of example, one option that would preserve the Historic Building 1 view-shed, could be relocating office space --- (as needed to be removed from the Alternative C buildings to keep those buildings' view-shed below the roof top of Historic Building 1) --- to one or more of the other developable land bay areas on the Federal Research Center Central Campus along Dahlgren Road (such as either Building 130, or the Dahlgren Road surface parking lot). While this developable land bay would not be "inside" the current FDA White Oak campus, it would, at least, be "contiguous" to the FDA White Oak campus within the FRC Central Campus (and would thus be consistent with the Congressional recommendation for the updated master plan, as noted above).</p>	See response to Comment 49
48	Global Lifesci Development Group	<p>This example of a revision to Alternative C, is merely one example, and is not the only way to meet the Congressional recommendations for the updated master plan and simultaneously remain faithful to the commitment to preserve the Historic Building 1 view-shed. Both of those objectives could also be achieved if some of the office space in proposed Alternative C buildings were relocated to other lands "contiguous" to the FRC/FDA campus in White Oak, such as on one or more of the numerous available lands noted in the 2018 Final EIS as within the White Oak Science Gateway Master Plan area. Thus, for additional examples, within a delineated area of the White Oak Science Gateway Master Plan area, there are many other separately owned parcels of land available for such a potential relocation of some of the Alternative C building office space, which could then cause the Alternative C building heights to be below the visible roof line of Historic Building 1 (and from which the GSA could receive a number of competitive bids --- including directly from Montgomery County, Maryland --- to build office space to serve the needs of FDA, as noted in the 2018 Final EIS, but in an even more cost-effective "total value" way for the federal taxpayers).</p>	Comment noted.

	Commenter	Comment	Response
49	Global Lifesci Development Group	While all of the new vehicle trips that are expected to be generated by the new private development within WOSG Master Plan have been accounted for and allocated, none of the additional vehicle trips that would be generated by the additional 9,000 FDA personnel on the FRC property were accounted for or factored into Montgomery County's \$900 Million new transportation infrastructure plans. Accordingly, the GSA 2018 Final EIS has to account for (and the federal taxpayers would be responsible for the direct costs relating to) these new FDA personnel vehicle trips associated with the expanded FDA HQ master plan consolidation. On the other hand, to whatever extent the 9,000 additional FDA personnel were located on any of the private properties within the WOSG Master Plan area "contiguous" or proximate to the FRC (e.g., if the "Delineated Area" of any GSA procurement for the FDA was limited to the -3,000 acres of the WOSG Master Plan area --- within which the GSA could receive multiple competing procurement bids), the federal taxpayers would not have pay any direct transportation infrastructure costs associated with those new FDA personnel located on those properties, because all vehicle trips originating to or from those surrounding private properties within the WOSG Master Plan were already factored into the State and County's planned -\$900 Million of transportation infrastructure improvements in the area.	Comment noted. The Transportation Impact Study that was conducted by GSA for the 2018 Master Plan took into consideration the existing developments along with the development that would occur as a result of the 2018 Master Plan. The TIS outlined measures that should be taken to reduce the amount of single occupancy vehicles. GSA has outlined the mitigation that they will be responsible for in this Record of Decision.
50	Greater Colesville Citizens Association	Speaking for myself and GCCA, we have reviewed and master plan/EIS and have no comments on the documents. The documents are well written.	Commented noted.
51	Labquest	1. While we agree that the Preferred development Alternative (Alternative C) has certain positive attributes, we are disappointed that the 16-story and 14-story office buildings would be visible from New Hampshire avenue. As Stated in the Master Plan (p. 11), " ... construction of the high-rise towers under the Preferred development Alternative will create an adverse effect to the historic visual setting of Building 1." We would prefer an alternative in which tall buildings could not be seen from New Hampshire Avenue. Alternative A (mid-rise office buildings)-perhaps with certain adjustments-seems to be more fitting to the historic visual setting.	Comment noted.
52	Labquest	2. We expect, and highly recommend, that the Preferred Development Alternative will maintain the existing security arrangements and restrictions for the U.S. Air Force Wind Tunnel.	Yes, the existing security arrangement and restrictions for the U.S. Air Force Wind Tunnel will be maintained.
53	Labquest	In the likely event that appropriated funds are not available to implement the master plan recommendations, we believe it is of utmost importance to house FDA employees and support staff in facilities located as close as possible to the white oak campus. We note that the congressional language directing the FDA Master Plan revision stated that consideration should be given to "land inside and contiguous to the White Oak campus." (Consolidated Appropriations Act of 2016, P. Law 114-113, Division A, Explanatory Statement, p. 30). It is not apparent that the Master Plan has considered leased space or other arrangements on land contiguous to the FDA campus. We strongly recommend that such consideration be given if lack of funding dictates that the No-Action Alternative be followed. Not doing so would be inconsistent with the fundamental purpose of the consolidation - to achieve efficiencies in FDA's vital work protecting the American public and advancing global health.	Comment noted.
54	Eileen Finnegan	GSA's choice of "Alternative C" as the Preferred Development Option for the further consolidation of FDA is to be applauded. This meets all the goals and provides the expansion desired.	Comment noted.
55	Eileen Finnegan	1. When the 2018 Master Plan/EIS is approved, please begin to improve the existing conditions on the campus by completing the much-needed parking garages quickly. As detailed in GAO Report 17-87, garages will ameliorate stormwater management problems AND begin to resolve the short-term difficulties that employees manage daily.	Comment noted.

	Commenter	Comment	Response
56	Eileen Finnegan	2. Please engage with Maryland's SHA, Montgomery County Department of Transportation and Prince George's Department of Public Works and Transportation to determine solutions to the on-going and future transportation difficulties in the area of the Federal Research Center immediately. This 2018 EIS/Master Plan should not be put on the shelf; it should be a call for action to deal with the short-comings in the area and begin to line up future funding for the necessary improvements. Firm modeling and planning for New Hampshire Ave must begin now to allow for a smooth growth of FDA and the area.	Comment noted.
57	Eileen Finnegan	3. Please consider modifying Master Plan Figure 1-20, page 35 (attached) to address the following: a. Coffman Road is shown as a potential new FDA Headquarters Entrance. This roadway's problematic relationship to the Cherry Hill/Powder Mill intersection has been acknowledged for years. In fact, GSA closed this entrance despite the objections of the Army Adelphi Laboratory. Attached is information and pictures of Coffman. b. There is an opportunity to have the New Hampshire BRT truly serve the FDA Campus, and not be a 2000' walk to the front entrance (and then further to specific offices). Please allow the New Hampshire BRT to stop at the planned on-site FDA Transit Center. Planning for this BRT line is scheduled to begin in FY22 with completion in FY24. c. And finally, please illustrate the future connection from the FDA Campus with the White Oak Transit Center.	Comment noted.
58	Eileen Finnegan	As the Montgomery County Planning Department requested, please enter into a MOU (like the one with NIH) to facilitate transportation coordination. A better working relationship with planners will improve coordination with the many local and state agencies along with the community at large.	GSA/FDA will be entering into a MOU with Montgomery County.
59	Jean Public	this agency is a pawn to big pharma and big medicine.it is not giving us the help we need to stay healthy in America. it works for big pharma and big medicine and not for the people of America. we don't want to employee 18000 of such traitors to the American citizen. this agency has been letting huge huge profits happen for big pharma and big medicine and in fact not helping the American consumer of medicine any better off. we are having major epidemics of autism so that America will be unable to compete with out of 25 boys now being autistic. the vaccines they put out are harmful. it approves crap chemical in our foods instead of making decisions that attack the USDA for using all the toxic chemicals so that they put out toxic food. this agency is powerful enough to fight against the USDA but instead sits on its butt and does nothing to tell the USDA they are producing toxic food that is giving us cancer. American live lengths are going down every single year with American bodies harmed by toxic chemicals invading our guts, our brains, etc. this agency is a real do nothing. I cant see keeping their numbers at 18,000 when they don't lift a finger to help the American people. they seem to take and take and take and help us not at all. I am very much opposed to this increase in headquarters. none of thememployees working at this agency have any spine or any brains or they would not be allowing the poisoning of America. this comment is for the public record. stop taxing us. let them all stay where they are. and cut the numbers from 18,000 down to 12,000 and look for more work from them to truly help America. Please receipt. jean public jean public1@gmali.com, everybody in America is losing out because of big	Comment noted.
60	Indira Konduri	GSA and FDA should work with Montgomery County (and other surrounding counties) to establish more Park and Ride spaces for commuters. I live in Montgomery County and yes, there are park and ride spaces near my home. However, with the morning commute traffic, they are not close enough for me – it takes too long to get to the park and ride.	Comment noted.

	Commenter	Comment	Response
61	Indira Konduri	Proposal – If Montgomery county facilities such as libraries, and federal facilities such as local post offices would allow car pool/van pools to park and ride, we could establish more vanpools. I have tried to establish a vanpool near my house for the past year and a half, and I have enough interested riders, but we do not have a place to park and ride. I asked Montgomery County library and the local USPS, but both have not come through with positive responses.	Comment noted.
62	Indira Konduri	Proposal 2 – provide incentive to local business to allow vanpool/carpools to park. I have tried to ask local businesses, churches to allow us to park, but again, no one has agreed to-date.	Comment noted.
63	Indira Konduri	The documents show concentration of employees in different zip codes. Direct bus service to white oak from some of these concentrated areas with FREE park and ride facility would be very helpful.	Comment noted.