4.0 RESPONSES TO COMMENTS ON THE DRAFT EIS

The Draft EIS for the 2018 Master Plan for the Consolidation of the U.S. FDA Headquarters at the Federal Research Center at White Oak located in Silver Spring, Maryland was released to the public and the Notice of Availability was published in the Federal Register on March 2, 2018. Written comments on the Draft EIS were accepted until April 17, 2018, and are addressed herein. A Public Hearing was held on the Draft EIS on March 22, 2018 . A transcript of the hearing follow the written comments. One comment was received during the public hearing from the Calverton Homeowner's Association who referenced his comment letter. The comments from the Calverton Homeowner's Association have been addressed.

The following table of contents can be referenced in order to find comments from specific people/organizations and the responses to those comments. Responses to indivisual comment letters follow after each letter.

WRITTEN COMMENTS

Federal Agencies

State of Maryland Agencies

County Agencies

Organizations

Private Citizens

Transcript from Public Hearing

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National Capital Planning Commission
401 9th Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel 202 482 7200 Fax 202 482 7272 www.ncpc.gov

IN REPLY REFER TO:
NCPC FILE No. MP201

April 18, 2018

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

Re: NCPC Comments on the Draft Environmental Impact Statement for the US Food and Drug Administration's (FDA) Headquarters Consolidation at the Federal Research Center, White Oak Campus – 2018 Master Plan

Dear Mr. Gyamfi:

I am writing in response to your request for review of the Draft Environmental Impact Statement (DEIS) dated February 2018, for the US Food and Drug Administration's (FDA) Headquarters Consolidation at the Federal Research Center (FRC), White Oak Campus, Silver Spring, Maryland prepared by the General Services Administration (GSA). The National Capital Planning Commission (NCPC) has advisory review authority for federal projects in the environs, pursuant to the National Capital Planning Act (40 U.S.C. § 8722(b)(1)). NCPC staff is providing comments on the EIS analysis due to its special planning expertise and as part of the upcoming preliminary review of the Draft Master Plan for the FDA Federal Research Center. The Commission will provide specific comments on the alternatives, and Transportation Management Plan (TMP) during its June 7, 2018 meeting.

Currently FDA has an existing campus population of 10,987 employees, with an average of 7,793 employees present on the FDA campus at any given time. The purpose of the project is to develop a master plan that accommodates future growth and further consolidates FDA operations. The master plan will provide a framework for development at the FRC to accommodate approximately 18,000 employees and support staff.

As you know, the Commission provided a scoping comment letter in September 2017. GSA provided a site visit and an information presentation to the Commission in December 2017. In general, we find that GSA has addressed the issues that we identified during the scoping process related to the environment, transportation, historic preservation, and urban design. We appreciate reviewing a DEIS that is clear, concise and prepared in a reader-friendly format. In particular, the DEIS analyzes a reasonable range of alternatives for the proposed action to avoid or minimize adverse effects upon the quality of the human environment; and evaluates appropriate environmental impacts. #1

In order to ensure that the final EIS will result in an important contribution to the decision-making process, NCPC staff offers the following comments for your consideration.

Alternatives

GSA has proposed three action alternatives. Overall, staff finds that Alternative A lacks efficiency, requires large building footprints, and results in significantly greater environmental impacts when compared to the other alternatives, specifically with regard to wetlands and streams, vegetation, impervious areas, and land disturbance. Alternative B and C are more compact, have similar

environmental impacts, but different urban design strategies. Alternatives B and C result in the same area of disturbance, impervious cover, and stream impacts. However, Alternative C will have the least amount of vegetation and stream valley buffer impacts among the three alternatives provided.

Alternative A (Mid-Rise Buildings)

Pros

- The building heights (up to 10-stories) will be in the range of the existing buildings, maintaining a sense of educational campus.
- The buildings will not be visible from New Hampshire Avenue, thus respecting the historic view of the Main Administration Building (Building 1) and the campus.
- The location of the conference center at front, in close proximity to the campus main entrance is convenient and utilizes an already disturbed parking lot.
- It requires the least amount of steep slope disturbance area when compared to the other two alternatives, resulting in 0.8 acres of steep slopes disturbance.

#2

Cons

- The buildings located at the eastern end of the commons will block the open view towards the FRC wooded area.
- It requires the largest amount of land disturbance area when compared to the other two alternatives.
- The stream impacts are greater than the other alternatives, resulting in 448 linear feet of permanent stream impacts.
- This is the only alternative impacting a wetland due to the construction of the proposed parking structure south of Dahlgren Road and the extension of Southwest Loop Road.
- The amount of impervious cover provided is greater than the other alternatives. The impervious cover will increase by 8.2 acres from proposed buildings, roads, and parking structures.
- This alternative will require the largest impacts to vegetation, including removal of 10.3 acres of forest, and 0.02 acres of wetland vegetation.
- A pedestrian bridge over a stream is needed to connect the southeast parking garage and office building to rest of the campus.

Alternative B (One Large Tower Office Building)

Pros

- The high-rise will provide an iconic building and anchor the eastern edge of the campus.
- The configuration of the conference center and L-shape office building in the northwest quadrant provides a more efficient solution than alternative A on an already disturbed parking lot.

#3

- It maintains an "open view" at the eastern end of the commons toward wooded areas of the FRC, as intended in the 2009 master plan.
- It does not have permanent impacts to wetlands, similar to Alternative C.

Cons

- The 20-story building will be visible from New Hampshire Avenue, Route 29, and the Capital Beltway, thus impacting the historic view of the Main Administration Building from New Hampshire Avenue.
- The land disturbance area is less than Alternative A, but equal to Alternative C.
- It will generate the greatest amount of steep slopes disturbance when compared to the other two alternatives, resulting in 1.3 acres.
- The impacts to streams will be the same as Alternative C, resulting in 270 linear feet of permanent stream impacts, however, Alternative A is the most impactful.
- It will result in less impervious cover than Alternative A, but the same as Alternative C, providing an additional 6.6 acres of impervious cover.
- It will require less forest removal than alternative A but more than Alternative C, resulting in 7.9 acres.

#3 Cont.

Alternative C (Two Large Tower Office Buildings)

Pros

- The height of the 14-story towers is more compatible with the existing campus scale than the high-rise option.
- The location of the dining pavilion within the commons area will help activate this open space and promote places for creative interchange and collaboration.
- The opening between the proposed buildings at the eastern end of the campus maintains the visual connection to the heavily wooded character of the FRC campus.
- The configuration of the conference center and L-shape office building in the northwest quadrant provides an efficient solution on an already disturbed parking lot, similar to Alternative B.
- It does not have permanent impacts to wetlands, similar to Alternative B.
- It will require the least amount of forest removal from all the alternatives, resulting in 7.7 acres.
- It will require the least amount of permanent stream valley buffer impacts from all the alternatives, resulting in 2.8 acres.

Cons

- The proposed towers will be visible from New Hampshire Avenue, and will affect the historic view of the campus.

#4

- The land disturbance area is less than Alternative A, but the same as Alternative B.
- It will generate less impacts to steep slopes disturbance than Alternative B, but more than Alternative A, resulting in 1.2 acres.
- It will generate less impacts to streams than Alternative A. Alternatives B and C will result in 270 linear feet of permanent stream impacts.
- It will result in less impervious cover than Alternative A. Alternatives B and C will provide an additional 6.6 acres of impervious cover.

#4 Cont.

Environmental Impacts

As mentioned above, the DEIS includes three action alternatives. Alternative A: Mid-Rise Buildings, includes buildings up to 10-stories tall, similar to the height of the existing buildings on campus. Alternative B: One Large Tower Office Building, includes a 20-story office building. Alternative C: Two Large Tower Office Buildings, includes two 14-story office buildings. While the program for Alternative A and C consist of approximately 1.5 million gross square feet, the program for Alternative B consists of 1.7 million gross square feet, a difference of approximately 200,000 gross square feet of development. If the program for Alternative B was maintained at 1.5 million square feet (the same as A and C), would the trade-offs of "building up" versus "building out" be more apparent? Currently the environmental benefits between Alternatives B and C are very similar. Is the additional 200,000 square feet needed in Alternative B? Will the population and parking number increase with the additional 200,000 square feet? Can the 1.7 million-square-foot program be accommodated in Alternatives A and C to be consistent in the EIS analysis or at least recognize that there are variations of each alternative? For example you could add more stories to the buildings in Alternatives A and C.

#5

Wildlife

- Instead of "negligible to minor," we consider that all action alternatives will result in long-term, "minor to moderate," adverse impacts due to the removal of forest, fragmentation, and increased impervious areas.

#6

Land Use Planning and Zoning

- The analysis should consider whether the proposed alternatives are compatible with existing land use and local zoning designations. In particular, the proposed building heights should be consistent with the maximum allowable height for this area under local regulations.

#7

- In addition to the three federal elements listed that relate to the FDA master plan, including Federal Workplace, Transportation, and Federal Environment, there are two other federal elements that apply to the project and should be included in the EIS. The Urban Design Element includes policies to inspire design for individual buildings and campuses, integrate federal buildings and campuses within the surrounding community, and provide urban design and perimeter security guidance. The Historic Preservation element includes policies related to the protection of historic properties, viewsheds and settings as integral parts of the properties historic character.

#8

Cultural Resources

We recommend that the EIS analyze the visual impacts of the proposed alternatives on the historic resources identified within the Area of Potential Effects (APE), including the Main Administration Building (Building 1), the Fire Station (Building 100), the flagpole area, the circle in front of Building 1, and the historic buffer. Therefore, we recommend providing the following views: #9

- Eye level views of the campus from New Hampshire Avenue, and the green buffer zone/historic golf course looking east toward Building 1.
- Pedestrian level views looking southwest from the historic Fire Station (Building 100) towards the proposed development.

In addition, views from the surrounding neighborhoods, Route 29 and the Capital Beltway will be helpful to analyze visual impacts of the proposed alternatives. We also encourage GSA to analyze lighting impacts of the proposed alternatives to minimize potential light pollution on the surrounding residential neighborhoods. #10

Traffic and Transportation

According to the Comprehensive Plan, for suburban federal facilities beyond 2,000 feet of a Metrorail, the parking ratio will reflect a phased approach linked to planned improvements over time (1:1.5-1:2). While the proposed ratio of one parking space for every 1.8 employees (1:1.8) is within this range, we encourage GSA to monitor future changes in travel, nearby housing, transportation improvements, demographics, and adopt a 1:2 ratio as a future goal. #11

We found the TMP to be adequate and we look forward to seeing the comments from Montgomery and Prince George's counties in this issue. #12

Lastly, we have attached a matrix that includes minor edits throughout the DEIS. We look forward to continuing to participate in the Section 106 consultation process. Please see our website, at www.ncpc.gov, for the Comprehensive Plan for the National Capital and our submission guidelines. If you have any questions regarding our comments or submission requirements, please contact Vivian Lee at (202) 482-7238 or vivian.lee@ncpc.gov.

Sincerely,

Diane Sullivan
Director, Urban Design and Plan Review

cc: Gwen Wright, Montgomery County Planning Department
Andree Green Checkley, Prince George's County Planning Department
Beth Cole, Maryland Historical Trust

Enclosure

National Capital Planning Commission April 18, 2018 Diane Sullivan

Comment 1: Comment Noted

Comment 2: Comment Noted

Comment 3: Comment Noted

Comment 4: Comment Noted

Comment 5: Comment noted. Difference in cost would decrease significantly. However Alternative B would be somewhat more expensive because of the cost of high rise construction.

Comment 6: Agree. EIS has been updated.

Comment 7: Text has been added to show that the Master Plan would be consistent with local building height restrictions according to Montgomery County's zoning ordinance.

Comment 8: The Urban Design Element and the Historic Preservation Element of the Comprehensive Plan have been added to the EIS. Additional text has been added to show how the Master Plan is and is not consistent with these two elements.

Comment 9: Eye level views from New Hampshire Avenue have been added to the EIS. Building 100 is already impacted as stated in the EIS; therefore, no additional renderings will be done. In addition, MHT has not requested pedestrian level views looking southwest from the historic Fire Station towards the development.

Comment 10: Comment Noted.

Comment 11: Comment Noted.

Comment 12: Comment Noted

2018/04/18

NCPC Staff Comments on the Draft Environmental Impact Statement – US Food and Drug Administration's (FDA) Headquarters Consolidation at the Federal Research Center, White Oak Campus – 2018 Master Plan

REVIEWER/AGENCY: Vivian Lee – 202-482-7238, vivian.lee@ncpc.gov / National Capital Planning Commission

COMMENT #	PAGE	Section	REVIEW COMMENTS	ACTION TAKEN ON COMMENTS
1	iv	Executive Summary	Please correct typo "Thus, the total number of parking spaces provided on the FDA Campus would be 11,709, which would include the additional 7,436 new additional parking spaces tfor FDA and its employees."	
2	v	Executive Summary	Please correct typo "Alternative B: One Larrge Tower Office Building"	
3	v	Executive Summary	It will be helpful to include an aerial view or axonometric to illustrate each alternative summary.	
4	vii	Executive Summary	Please consider impacts to pollinators under vegetation and wildlife.	
5	xxii	List of Acronyms	ISC ~~International Security Council~~ Interagency Security Committee	
6	xxii	List of Acronyms	M-NCPPC Maryland-National Capital *Park and* Planning Commission	
7	4	1.3	Fix graphic link error "Reference source not found. *Figure 1*	
8	16	1.6.3	Include the Presidential Memo "Creating a Federal Strategy to Promote the Health of Honey Bees & Other Pollinators" under the Statues, Regulations, and Executive Orders	
9	22	2.2.2 / Figure 3	Please add road names to the existing aerial view.	
10	61	3.1.5	Please correct typo: "…by the human ~~hear~~."	
11	67	3.2.1	Fix graphic link error "Reference source not found." Figure 14	
12	75	3.2.3 / Table 9	It will be helpful to include an additional column providing the total land disturbance area under each alternative, including additional acres impacted, plus steep slopes impacted.	
13	83	3.3.3	Correct graphic reference error (Figure19~~Figure 18~~)	
14	86	3.3.4	It will be helpful to provide a table comparing the amount of impervious cover (in acres and percentages) for each alternative.	

COMMENT #	PAGE	Section	REVIEW COMMENTS	ACTION TAKEN ON COMMENTS
15	89	Figure 20, 21	It will be helpful to provide additional graphics overlaying each proposed alternative (building footprints, roads, bridges, etc.) on top of the stream and stream valley buffer impacts to better understand the analysis provided under each action alternative (section 3.3.3). Please provide a similar graphic for Alternative C, since the EIS does not include a graphic for this alternative.	
16	104	3.4.2	Fix graphic link error "Reference source not found."	
17	105	3.4.2	Fix graphic link error "Reference source not found."	
18	105	3.4.2	Under vegetation Impacts, it will be very helpful to provide graphics that illustrate the boundaries of forest impacts, maintained lawns, and wetlands, and also overlay the proposed building footprints for each alternative to understand how the proposed structures impact vegetation.	
19	146	3.12.2.1	Please remove redundant word "The Federal Research Center is surrounding by ~~suburban~~ residential suburbs…"	
20	3	Appendix H TMP	Please correct the following statement: "For the proposed FDA site, the prescribed parking ratio is 1:1.8." According to the Comprehensive Plan, for suburban federal facilities beyond 2,000 feet of a Metrorail, the parking ratio will reflect a phased approach linked to planned improvements over time (1:1.5-1:2). Therefore, the proposed parking ratio is within the range prescribed by the Comprehensive Plan.	
21		Appendix H TMP	Are the mode shares adjusted for absentees? Some campuses have daily average absentee rates of 2-3% and if that's the case here, then FDA should not provide parking for these people, thereby enabling a larger supply of parking on campus.	
22		Appendix H TMP	How many current employees are expected to retire over the life of the master plan (based on historic data)? What would the future resulting ratio be if additional parking were provided for new employees at a 1:2 rate?	
23		Appendix H TMP	The TMP states that there are 85% of the assigned employees on-campus (peak) – how long does this peak last for? Is it for a short period, or most of the day?	
24		Appendix H TMP	Are there any leased parking opportunities nearby?	
25		Appendix H TMP	What is the difference in number of spaces between a 1:1.8 and a 1:2?	

Comment 1: The EIS has been updated.

Comment 2: The EIS has been updated.

Comment 3: Aerials figures have been added.

Comment 4: The EIS has been updated.

Comment 5: The EIS has been updated.

Comment 6: EIS has been updated.

Comment 7: The EIS has been updated.

Comment 8: The EIS has been updated.

Comment 9: The EIS has been updated.

Comment 10: The EIS has been updated.

Comment 11: The EIS has been updated.

Comment 12: Additional columns have been added to include total land disturbance and area of steep slopes impacted for each alternative.

Comment 13: The EIS has been updated.

Comment 14: A new table has been added to the EIS to show these numbers.

Comment 15: Pages 115 - 117 of the master plan overlays SVB with the alternatives. The streams, wetlands, stream/wetland impacts, and impacts to the SVBs that are shown on Figures 3-20 and 3-21 of the EIS will be added.

Comment 16: The EIS has been updated.

Comment 17: The EIS has been updated.

Comment 18: Pages 115 - 117 of the master plan overlays SVB with the alternatives. The edge of the forest canopy will be added.

Comment 19: The EIS has been updated.

Comment 20: The EIS has been updated.

Comment 21: The mode shares are not adjusted for absentees. However, absentees are calculated when determining the number of additional non-auto trips that would need to be reached to meet the 46% NADMS goal.

Comment 22: While employees retiring or leaving FDA is anticipated over time, it is anticipated that these positions would be refilled. The FDA has identified a significant need for additional staff which is anticipated to continue well into the future.

Comment 23: The text will be clarified. The peak being referred to is peak onsite attendance over the year, which typically occurs in or around March. This accounts for people absentees, vacation, off-site meetings, teleworking, etc.

Comment 24: FDA has previously explored leasing parking spaces from the nearby Sears Department Store. However, an agreement could not be reached. No leased parking is being considered at this time.

Comment 25: A 1:1.8 ratio results in approximately 10,000 parking spaces, while a ratio of 1:2 would result in approximately 9,000 parking spaces.

Comment 26: Figure 11 lists improvements that would attract auto drivers to other modes. The respondents who reported barely biking to work do it occasionally during nice weather and it is not their primary commute mode. While employees retiring or leaving FDA is anticipated over time, it is anticipated that these positions would be refilled. The FDA has identified a significant need for additional staff which is anticipated to continue well into the future.

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Chesapeake Bay Field Office
177 Admiral Cochrane Drive
Annapolis, Maryland 21401
http://www.fws.gov/chesapeakebay

4/11 Stephanie H.
Paul G.

May 21, 2014

Re: Quicker and easier online project review process for Delaware, Maryland and Washington, D.C.

To whom this concerns:

Although workloads continue to increase at the U.S. Fish and Wildlife Service's Chesapeake Bay Field Office, we are dedicated to providing the public with the best, most efficient service possible. Therefore, we have developed an online project review process to identify whether a project will or will not impact federally-listed endangered or threatened species in Delaware, Maryland and Washington, D.C.

#1

We are asking all those with the capability to use this online process to go to:

http://www.fws.gov/chesapeakebay/EndSppWeb/ProjectReview/Index.html

Using this website will take approximately 15 minutes and you will receive an immediate answer regarding whether your project will potentially impact federally listed endangered or threatened species and, if need be, any further instructions. Please contact Trevor Clark of my staff at (410) 573-4527 or by email at Trevor_Clark@fws.gov if you have any questions about the online review process or are unable to use this online tool.

Sincerely,

Genevieve LaRouche
Supervisor

TAKE PRIDE IN AMERICA

U.S. Fish & Wildlife Service, May 21, 2014 Genevieve LaRouche

Comment #1: Comment noted. This review was completed in September 2017.

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

April 13, 2018

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

Re: Draft Environmental Impact Statement for FDA Federal Research Center Master Plan at White Oak—Silver Spring, Maryland (CEQ Number: 20180027)

Dear Mr. Gyamfi:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act, and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency (EPA) has reviewed the February 2018 Draft Environmental Impact Statement (DEIS) prepared by the General Services Administration (GSA) for the proposed U. S. Food and Drug Administration (FDA) Federal Research Center Master Plan at White Oak in Silver Spring, Maryland.

To accommodate future growth and further consolidate FDA operations, GSA prepared this DEIS to assess the impacts of a significant employee population increase of up to approximately 18,000 employees over a period of 15 years. The DEIS analyzes three alternatives: A, B, and C which are differentiated mainly by the number and height of buildings GSA and FDA are proposing to construct. Alternative A proposes five new buildings, at ten stories high, resulting in permanent impacts to 448 linear feet of stream impacts, 0.02 acres of wetlands, adding 8.2 acres of impervious surface, and requiring 10.3 acres of forest clearing. Alternatives B and C are similar in their impacts to natural resources including 270 linear feet of stream impacts, 6.6 acres of added impervious surface, and 7.9 acres of forest clearing. Based on the alternatives analysis presented in the DEIS, it is apparent that Alternative B and C would result in somewhat less environmental impact than Alternative A. A preferred alternative has not yet been identified.

EPA has rated the alternatives presented in the FDA FRC Master Plan as a Lack of Objections (LO). The LO rating means that our review identifies that the draft EIS adequately sets forth the environmental impacts of the alternatives reasonably available to the project. Enclosure 1 outlines some clarifying information that EPA suggests GSA include in the subsequent NEPA document. A description of our rating system can be found at: https://www.epa.gov/nepa/environmental-impact-statement-rating-system-criteria. #1

Thank you for the opportunity to review this project. If you have questions regarding suggestions including in this letter, the contact for this project is Nora Theodore; she can be reached at 215-814-2728 or theodore.nora@epa.gov.

Sincerely,

Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

Enclosure (1)

Enclosure: Technical Comments
FDA Federal Research Center Master Plan at White Oak

Please find below comments to consider in preparation of the final NEPA document and in project design. We would be pleased to discuss or provide additional information, at your convenience.

- We encourage the project team to continue efforts to avoid and minimize impacts to forest and stream resources. As the project moves onto the CWA 404 process, we also encourage the project team consider mitigation for unavoidable impacts. Onsite mitigation options may include creating a forested buffer and restoring sinuosity in historically straightened stream reaches onsite and monitoring to assess the success of mitigation efforts. A functional assessment of impacted water resources may be beneficial for finalizing appropriate mitigation. #2
- EPA recommends addressing site-wide stormwater management to the maximum extent possible, which may include retrofitting stormwater ponds, particularly SWM #1. Stormwater management should comply with all applicable standards and specifications or higher. #3
- EPA recommends that the concentrations of PCBs found in groundwater at CERLIS Operable Unit (OU) 2 and concentrations of Volatile Organic Compounds (VOCs) found at OU7 be reported in the EIS. Additionally, the DEIS states that sampling of these sites was last completed in 2014. Please address if samples will be taken again in advance of construction. #4
- EPA suggests including more information about the photovoltaic array on the FDA campus including its energy output and if there are plans to expand this array in the future to meet energy needs of the campus. #5
- EPA recommends further analysis of proactive measures that could allow surrounding minority and low-income populations to benefit from the economic development opportunities of the proposed project, specifically related to new jobs. #6
- EPA suggests including a description of state and local tree ordinances that the project will comply with during and following forest clearing. Maintaining and/or creating forested buffers wherever possible is encouraged. #7
- Due to increase in impervious surface expected from all Action Alternatives, EPA suggests the use of permeable pavement wherever possible in addition to other low impact development techniques. #8

EPA April 13, 2018 Barbara Rudnick

Comment 1: Comment Noted

Comment 2: Comment Noted. GSA will consider a functional assessment during project design.

Comment 3: Stormwater management is discussed in Section 3.3.5 of the EIS. A stormwater management plan has also been provided in the Master Plan.

Comment 4: Comment Noted. Samplings are done once a year and a public meeting is held to present the results. The last public hearing was held on April 6, 2018. The EIS will be updated to reflect the new results.

Comment 5: Section 3.14.1 of the Final EIS has been updated to include the amount of photovoltaic arrays the FDA Campus currently has. GSA/FDA support the concept of renewables on campus and it should be noted the goal is for the future development to be net zero. The actual engineering will occur during project design.

Comment 6: Agree. GSA will follow the FAR in its solicitations for each project for implementing the Master Plan.

Comment 7: Text has been added to Section 3.4.3 of the Final EIS to show how GSA will comply with state and local tree ordinances.

Comment 8: Comment noted. GSA will assess each phase of the Master Plan as it is designed to ensure that they are using the most current best management practices for stormwater management, where possible.

MARYLAND DEPARTMENT OF NATURAL RESOURCES

April 4, 2018

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

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

Dear Mr. Gyamfi:

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

#1

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

Sincerely,

Lori A. Byrne

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

ER# 2018.0329.mo

Tawes State Office Building – 580 Taylor Avenue – Annapolis, Maryland 21401
410-260-8DNR or toll free in Maryland 877-620-8DNR – dnr.maryland.gov – TTY Users Call via the Maryland Relay

Maryland Department of the Environment, April 4, 2018, Lori A. Byrne

Comment #1: Comment Noted

MARYLAND DEPARTMENT OF PLANNING

Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Robert S. McCord, Acting Secretary

April 13, 2018

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

STATE CLEARINGHOUSE RECOMMENDATION

State Application Identifier: MD20180306-0135
Applicant: U.S. General Services Administration
Project Description: Draft Environmental Impact Statement (EIS): To Analyze the Potential Impacts from the Proposed Master Plan for the Food and Drug Administration (FDA) Headquarters Consolidation at the Federal Research Center at White Oak, located in Silver Spring, Maryland
Project Address: 10903 New Hampshire Avenue, Silver Spring, MD 20993
Project Location: County(ies) of Montgomery
Approving Authority: U.S. General Services Administration GSA
Recommendation: Consistent with Qualifying Comments and Contingent Upon Certain Actions

Dear Mr. Gyamfi:

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

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

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

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

1. If the applicant suspects that asbestos is present in any portion of the structure that will be renovated/demolished, then the applicant should contact the Community Environmental Services Program at (410) 537-3215 to learn about the State's requirements.

#1

301 West Preston Street - Suite 1101 - Baltimore - Maryland - 21201
Tel: 410.767.4500 - Toll Free: 1.877.767.6272 - TTY users: Maryland Relay - Planning.Maryland.gov

2. Construction, renovation and/or demolition of buildings and roadways must be performed in conformance with State regulations pertaining to "Particulate Matter from Materials Handling and Construction" requiring that during any construction and/or demolition work, reasonable precaution must be taken to prevent particulate matter, such as fugitive dust, from becoming airborne. #2

3. During the duration of the project, soil excavation/grading/site work will be performed; there is a potential for encountering soil contamination. If soil contamination is present, a permit for soil remediation is required from MDE. Please contact the New Source Permits Division at (410) 537-3230 to learn about the State's requirements. #3

4. Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land Management Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information. #4

5. If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information. #5

6. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Waste Diversion and Utilization Program at (410) 537-3314 for additional information regarding recycling activities. #6

7. The Waste Diversion and Utilization Program should be contacted directly at (410) 537-3314 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations. #7

8. Any contract specifying "lead paint abatement" must comply with Code of Maryland Regulations. If a property was built before 1950 and will be used as rental housing, then compliance with COMAR 26.16.02 is required. Additional guidance regarding projects where lead paint may be encountered can be obtained #8

The Maryland Historical Trust (Trust) stated that their finding of consistency is contingent upon the applicant taking the action summarized below.

The Trust indicated that they will work with GSA to complete the historic preservation review.

Any statement of consideration given to the comments should be submitted to the approving authority, with a copy to the State Clearinghouse. The State Application Identifier Number must be placed on any correspondence pertaining to this project. The State Clearinghouse must be kept informed if the approving authority cannot accommodate the recommendation. #9

Please remember, you must comply with all applicable state and local laws and regulations. If you need assistance or have questions, contact the State Clearinghouse staff person noted above at 410-767-4490 or through e-mail at myra.barnes@maryland.gov.

Mr. Paul Gyamfi
April 13, 2018
Page 3
State Application Identifier: **MD20180306-0135**

Also, please complete the attached form and return it to the State Clearinghouse as soon as the status of the project is known. ***Any substitutions of this form must include the State Application Identifier Number.*** **This will ensure that our files are complete.**

Thank you for your cooperation with the MIRC process.

Sincerely,

Myra Barnes, Lead Clearinghouse Coordinator

MB:MB
Enclosure
cc: Greg Golden - DNR
Amanda Degen - MDE
Tina Quinichette - MDOT
Wendy Scott-Napier - DGS
Greg Ossont - MTGM
Cathy Conlon - MNCPPCM
Joseph Griffiths - MDPL
Beth Cole - MHT

18-0135_CRR.CLS.docx

MARYLAND DEPARTMENT OF PLANNING

Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Robert S. McCord, Acting Secretary

PROJECT STATUS FORM

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

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

DATE: _____
(Please fill in the date form completed)

FROM: _____
(Name of person completing this form.)

PHONE: _____-_____-_____
(Area Code & Phone number)

RE: **State Application Identifier:** **MD20180306-0135**
Project Description: Draft Environmental Impact Statement (EIS): To Analyze the Potential Impacts from the Proposed Master Plan for the Food and Drug Administration (FDA) Headquarters Consolidation at the Federal Research Center at White Oak, located in Silver Spring, Maryland

PROJECT APPROVAL			
This project/plan was:	☐ **Approved**	☐ **Approved with Modification**	☐ **Disapproved**
Name of Approving Authority: _____			**Date Approved:** _____

FUNDING APPROVAL			
The funding (if applicable) has been approved for the period of: _____, 201____ **to** _____, 201____ **as follows:**			
Federal $: _____	**Local $:** _____	**State $:** _____	**Other $:** _____

OTHER
☐ *Further comment or explanation is attached*

Maryland Department of Planning • 301 West Preston Street, Suite 1101 • Baltimore • Maryland • 21201

Tel: 410.767.4500 • Toll Free: 1.877.767.6272 • TTY users: Maryland Relay • Planning.Maryland.gov

MDPCH-1F

Maryland Department of Planning April 13, 2018 Myra Barnes

Comment 1: Comment Noted

Comment 2: Comment Noted

Comment 3: Comment Noted

Comment 4: Comment Noted

Comment 5: Comment noted.

Comment 6: Comment Noted

Comment 7: Comment Noted

Comment 8: Comment Noted

Comment 9: Comment Noted

MARYLAND DEPARTMENT OF TRANSPORTATION
STATE HIGHWAY ADMINISTRATION

Larry Hogan
Governor
Boyd K. Rutherford
Lt. Governor
Pete K. Rahn
Secretary
Gregory Slater
Administrator

April 16, 2018

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

Dear Mr. Gyamfi:

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

General Comments

- Any mention of the "State Highway Administration," "Maryland State Highway Administration," "SHA," "MSHA," "MDSHA" or the like should be replaced with "the Maryland Department of Transportation State Highway Administration (MDOT SHA)" on first mention and "MDOT SHA," subsequently. Similarly, any mention of "MTA" or the like should be replaced with "the Maryland Department of Transportation Maryland Transit Administration (MDOT MTA)" on first mention and "MDOT MTA," subsequently. #1

- Any road included in the National Highway System (NHS), of which MDOT SHA owned- and maintained I-95, I-495 (Capital Beltway), US 29 (Columbia Pike), and MD 650 (New Hampshire Avenue) in and near White Oak are component facilities, must remain compliant with the transportation performance measure processes, goals, and targets called for in MAP-21 and the FAST Act. Many of these goals are related to traffic operations, capacity, and throughput. While MDOT SHA encourages GSA to study ways to emphasize non-auto modes, improvements at the "expense" of vehicular mobility may lead to a situation where NHS compliance is called into question by the Federal Highway Administration. #2

707 North Calvert St., Baltimore, MD 21202 | 410.545.5675 | 1.888.204.4828 | Maryland Relay TTY 800.735.2258 | roads.maryland.gov

- This DEIS does not appear to note MDOT SHA's in-planning I-495 and I-270 Public-Private Partnership (P3) Project announced by Governor Larry Hogan in September 2017. This $7.6 billion investment will implement express toll lanes on I-270 and I-495 in Maryland. Planning funding for these improvements is included in MDOT's FY 2018-2023 Consolidated Transportation Program (CTP). These improvements are included in the National Capital Region Transportation Planning Board's (TPB) in-draft long-range transportation plan (LRTP), *Visualize 2045*, and accompanying regional transportation modeling efforts. As this DEIS analyzes a 2040 scenario, these improvements should be assumed in any modelling that informs this DEIS. The MDOT SHA anticipates completing planning and selecting a concessionaire in 2020. The MDOT SHA requests that this DEIS consider including mention of this project as well as the transportation benefits that will result from implementation of this project. #3

- In general, intersection design is beyond the scope of a master plan. Nonetheless, future modifications to intersections should not result in failing levels of service on MDOT SHA roadways and will need to be supported by appropriate traffic operations studies at the time improvements are proposed to advance. #4

- In the development of this DEIS (and the accompanying master plan), did GSA consider implementing campus build-out thresholds whereby specific campus employment populations are accommodated only after previous thresholds' commute/parking needs are accommodated. Such a consideration may prevent undue stress on the local roadway network and on-campus parking facilities should anticipated non-auto mode shares not be reached. #5

- The effectiveness of transportation demand management strategies and policy initiatives referenced in this DEIS and appendices should be evaluated comprehensively during the five-year planning phase. #6

2018 FRC Master Plan DEIS

- p. 43 – Under "Traffic and Transportation," it is reported that the No-Action Alternative would have negative impacts due to traffic from current development. As the current development is there already, MDOT SHA is not sure why there would be a further negative impact from the site. #7

- p. 48 – The proposed transportation mitigation measures mention US 29 ITS improvements. It should be noted in this text that such measures will need to be coordinated with MDOT SHA and the Montgomery County Department of Transportation (MCDOT) as is noted for other mitigation measures on the list. #8

- p. 65 – The report notes in subsection 3.1.7 that few home relocations are expected with the addition of almost 7,000 employees to the site. It is not noted where these people currently work to support this. #9

- p. 165 – In the first paragraph, it appears that the descriptions of the eastern and western study area limits are switched. #10

- p. 173 – The description of Michelson Road intersection mitigation describes Mahan Road left-turns. #11

- p. 174 – The description for US 29 mitigation at Industrial Parkway mentions changes to Old Columbia Pike in the fourth item instead of to Columbia Pike. #12

DEIS Appendix G – Transportation Technical Report – Project Summary

- p. ii, Conclusions and Mitigation, Transportation Demand Management – The MDOT SHA encourages GSA to work with MDOT SHA, MCDOT, and the Prince George's County Department of Public Works and Transportation (PGDPW&T) to identify ways to optimize the current network of MDOT SHA and MCDOT park-and-ride facilities, especially by linking potential employee shuttle operations to nearby park-and-ride facilities, and to identify potential sites for network expansion. #13

- pp. iii-v, Conclusions and Mitigation, Additional Roadway Capacity – The MDOT SHA notes that while funding for design, right-of-way acquisition, and construction remains to be identified (MDOT SHA completed a US 29 corridor FEIS in 1995), US 29 interchanges at Stewart Lane, Tech Road/Industrial Parkway, Musgrove Road/Fairland Road, Greencastle Road, and Blackburn Road remain in MDOT's CTP, the State's Highway Needs Inventory, TPB's regional transportation model, and Montgomery County's White Oak Local Area Transportation Improvement Program. Therefore, MDOT SHA recommends these interchanges be included in any modelling that informs this DEIS. (The MDOT SHA notes that p. 61 of Appendix G states, "the Action with Mitigation [alternative] evaluates the short-term enhancements only" and not the interchanges.) The MDOT SHA anticipates these five interchanges, collectively, cost approximately $400 million-$600 million. Local transportation priorities are a key driver of MDOT's project funding decisions. In its 2017 transportation priorities letter, Montgomery County noted that "interchanges have been identified as solution at [some US 29 locations], including Fairland/Musgrove Road and Tech Road/Industrial Parkway, but funding for design and construction has not been identified in the current CTP." The MDOT SHA requests that GSA consider the benefit of a US 29 interchange at Industrial Parkway (and Tech Road) and consider options to partner with MDOT and Montgomery County to identify funding opportunities for this project. #14

- p. vi, Conclusions and Mitigation, Transit, Pedestrian, and Bicycle Facilities – The MDOT SHA encourages GSA to work with MDOT SHA, MCDOT, and PGDPW&T to identify ways to best accommodate bicyclists and pedestrians in areas adjacent to the FRC. The MDOT SHA maintains various funding mechanisms by which the State, solely, or in partnership with local jurisdictions can develop and implement new or upgrade existing bicycle and pedestrian infrastructure. #15

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

- No comments.

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

- No comments.

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

- p. 32, Existing Roadway Network, Vehicle Study Area – In the first paragraph, it appears that the descriptions of the eastern and western study area limits are switched. #16
- pp. 32-36, Existing Roadway Network – Operations analyses should discuss how the Synchro models used were validated to current conditions. #17
- p. 36, table 5 (and other tables showing intersection LOS) – The average delays and 95th percentile queues should be reported to better differentiate between operations in separate scenarios when the LOS is the same letter grade. #18
- p. 44, table 12 – The intersection LOS improves for the US 29 intersection at Cherry Hill Road/Randolph Road when going from Existing Condition to the No Action Alternative. Please explain this and why the LOS remains acceptable in the Build Alternative, as well. #19
- p. 50 - The proposed transportation mitigation measures mention US 29 ITS improvements. It should be noted in this text that such measures will need to be coordinated with MDOT SHA and MCDOT as is noted for other mitigation measures on the list. #20
- pp. 50-58, Additional Capacity - See previous comment regarding US 29 interchange project development status, pp. 2-3. In addition, it remains unclear how much short-term improvements such as signal timing and additional lanes would mitigate traffic versus long-term interchange options. #21

- p. 51, New Hampshire Avenue (MD 650) and Powder Mill Road – Thought regarding significant modification requiring right-of-way may be needed for full mitigation, the improvement needed to meet the mitigation requirements should be discussed. Also, based on the results of the Synchro analysis in Exhibit 3, the proposed optimization of signal phase lengths does not appear significantly to improve operations. #22

- p. 53, New Hampshire Avenue (MD 650) and Northwest Drive/Michelson Road – The description of Michelson Road intersection mitigation describes Mahan Road left turns. #23

- p. 53, New Hampshire Avenue (MD 650) and Northwest Drive/Michelson Road – The MDOT SHA currently is reviewing local resident concerns regarding cut-through traffic from the FRC via Northwest Drive. Anticipated MD 650 traffic conditions may exacerbate future diversion to the local/residential network without proper mitigation, e.g., signage and restrictions. #24

- p. 53, New Hampshire Avenue (MD 650) and Lockwood Drive – The suggestion to restrict eastbound Lockwood Drive left-turn movements to northbound MD 650 seems to require difficult wayfinding for US 29 motorists. #25

- p. 59, Transit, Pedestrian, and Bicycle Facilities – See previous comment regarding bicycle and pedestrian infrastructure development, p. 4. #26

- p. 60, table 18 – The proposed mitigation is shown to keep US 29 intersection operations at Lockwood Drive at LOS F. Yet, in Exhibit 4, the evening peak-period LOS degrades from LOS E to LOS F with the addition of mitigation. Please check and revise mitigation if it will, in fact, make the intersection operate at a lesser LOS. #27

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

DEIS Appendix G – Transportation Technical Report – Section 4 Conclusions

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

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

DEIS Appendix G – Exhibits 1-2

- It appears that northbound US 29 morning peak-period turning volumes at Tech Road were repeated from the interchange at Randolph Road and are lower than MDOT SHA's actual counts. #31

- Northbound US 29 through movements in the evening peak period appear to be much higher than MDOT SHA's actual counts between MD 650 and Musgrove Road. #32

- The MD 650 intersection at Powder Mill Road has a relatively significant U-turn movement volume that is not shown in these counts. #33

DEIS Appendix H – Draft Transportation Management Plan – Executive Summary

- p. ii, Goals – The MDOT SHA supports goals and strategies that seek to lessen the single-occupant vehicles (SOV) on the roadway network and commends GSA for seeking to cut SOV mode share to 54 percent. Nonetheless, this plan does not appear to address what happens on an atypical day. Is a parking "cushion" included in this analysis for those days when the SOV target is not reached? #34

- p. iii, Strategies, Transit, and Shuttles – This plan, in this and other sections, speaks about increasing the use of commuter bus as a commute mode. While this plan notes that MDOT MTA Commuter Bus 204 currently stops at the FRC, the plan does not appear to note that MDTA MTA Commuter Bus routes 305 (Columbia-Washington via US 29), 315 (Columbia-Washington via US 29), and 325 (Columbia-Washington via US 29) all pass near to the FRC and that it may be a viable option to work with MDOT MTA to amend these routes also to stop at the FRC. #35

- p. iv, Strategies, Bike/Walk to Work – This plan should note (and does in other locations) that many roadways in the area are owned and maintained by MDOT SHA. Bicycle and pedestrian accommodations upgrades along such roads (I-95, I-495 (Capital Beltway), US 29 (Columbia Pike), and MD 650 (New Hampshire Avenue)) should be coordinated with both MDOT SHA and the applicable local jurisdiction. #36

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

- p. 4, section 1.1.1.3 Transportation Planning Board (TPB) – Currently, Metropolitan Washington Council of Governments staff is drafting and conducting modeling activities for *Visualize 2045*, which TPB anticipates adopting in the Fall of 2018. This new LRTP will include TPB's policy framework to guide future regional transportation investments and a fiscally-constrained list of projects planned for implementation between 2018 and 2045. #37

- US 29 interchanges at Stewart Lane, Tech Road/Industrial Parkway, Musgrove Road/ Fairland Road, Greencastle Road, and Blackburn Road are included in this draft document. This new LRTP will replace the existing *Constrained Long-Range Plan* (adopted 2016). This DEIS should reflect TPB's regional transportation model. #38

- p. 5, section 1.1.3 Local – Currently, Montgomery County Planning Department staff is drafting a comprehensive update to the *Master Plan of Highways and Transitways*, the first comprehensive update to the plan since 1955. This plan is to be adopted in late 2018 or early 2019. #39

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

- p. 8, section 2.1 Local Roadway Network – This plan should note that I-95, I-495, US 29, and MD 650 are components of the NHS. In addition, this plan should note that these roadways are owned and maintained by MDOT SHA. Cherry Hill Road is owned and maintained by Montgomery and Prince George's counties in their respective jurisdictions. #40

- p. 8, section 2.1 Local Roadway Network – This plan states that the posted speed limit on I-95 is 55 mph. North of I-495, the posted speed limit is 65 mph. #41

- p. 11, section 2.3.2.1 Bus Rapid Transit (BRT) – The MDOT SHA recommends this plan clarify the extent of US 29 BRT improvements. The popular conception of BRT is a bus running in a fixed, dedicated lane or lanes. Montgomery County's planned US 29 BRT does not include all elements of full BRT. #42

- p. 18, section 2.5.1 White Oak Master Plan – This plan states that improvements identified in the White Oak Master Plan are assumed already to be constructed in the No Action condition. Is there any assurance that these will be completed prior to FRC build-out? #43

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

- No comments.

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

- p. 45, section 4.0 Traffic Impact Analysis – In paragraph one, clarify that the "FDA Master Plan Traffic Technical Report (TTR)" and Appendix G are one in the same, or that one is an update to the other. #44

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

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

#46

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

Sincerely,

Samantha Biddle
Chief
Regional and Intermodal Planning Division

cc: Ms. Mary Gibert, Public Buildings Service Regional Commissioner, National Capital Region, GSA
Ms. Stephanie Hamlett, AICP, Chief, Planning Branch, National Capital Region, GSA
Shelly Jones, AIA, Community Planner, National Capital Region, GSA
Mr. Matt Baker, Regional Planner, MDOT SHA

Maryland Department of Transportation April 16, 2018 Samantha Biddle

Comment 1: The EIS has been updated.

Comment 2: Comment Noted

Comment 3: The TTR has been updated to mention these projects (see page 47).

Comment 4: Comment Noted

Comment 5: Phasing and thresholds were not considered at the master-plan level. The TTR is intended to assess transportation impacts of the full master plan. Because phasing was not identified in the master plan, it is not considered in the TTR or DEIS.

Comment 6: As stated in Chapter 7 of the TMP, the TMP will be updated at a minimum every two years. An implementation plan is also provided in Chapter 6.

Comment 7: Sentence will be revised to say "planned developments"

Comment 8: The Traffic and Transportation Mitigation in Section 2.5 and 3.13.3.4 of the Final EIS has been updated.

Comment 9: As stated in Section 1.1 of the EIS, the purpose of the proposed action is to provide a master plan to support further consolidation of FDA employees and projected growth. The projected growth includes funded staff vacancies, existing employees currently in leased space in Montgomery and Prince George's counties, FDA support staff, and future growth. In addition, based upon survey results of employees that will be relocated to the White Oak Campus, most would not move their residence. However, new hires may choose to live closer to campus, particularly after the development of nearby sites such as Viva White Oak. Additional text has been added to Section 3.1.7 to clarify.

Comment 10: Section 3.13.1.1 of the EIS has been updated.

Comment 11: Table 23 of the EIS has been updated.

Comment 12: Table 23 of the EIS has been updated.

Comment 13: GSA/FDA is currently coordinating and will continue to work with MDOT SHA, MCDOT, PGDPW&T to identify ways to optimize the current network.

Comment 14: Comment noted. There is no timeline for implementation of the changes to the interchanges; therefore the traffic analysis must assume that these interchanges would not be constructed and thus what mitigation measures could be implemented to manage traffic in their absence. The text will be revised to change "short-term" to alternative enhancements and a discussion of the importance of the interchanges will be provided. It should also be noted that this was the general approach used in the White Oak Local Area Transportation Improvement Program (LATIP) which also looked at future mitigation without the interchanges.

Comment 15: Comment Noted

Comment 16: Page 34 of the TTR has been updated.

Comment 17: Queue observations were conducted during peak periods to identify locations of unmet demand. Where unmet demand was encountered, volume was added to the TMC data.

Comment 18: Average delays is being added to the table for comparison purposes.

Comment 19: The No Action Alternative assumes local network improvements identified in the White Oak Science Gateway Master plan, as well as routine signal timing enhancements. The combination of these improvements result in both changes to existing traffic patterns, as well as improvements to intersection operations that result in a slight improvement at some intersections, including the US 29 interchange at Cherry Hill/Randolph Road. This interchange continues to work at an overall acceptable LOS given that the FDA project is adding vehicles to only two approaches (SB L in the AM) and the NB on-ramp in the PM, which is a low-conflict movement.

Comment 20: The TTR has been updated (see page 56).

Comment 21: See response to comment 14.

Comment 22: The County has identified this intersection as needing significant improvements as part of overall traffic growth in the area but has not developed a plan at this time. However the text has been revised to reference additional turn lanes and/or grade separation.

Comment 23: TTR has been updated (see page 59).

Comment 24: Text has been revised to include recommendation for no through-movement sign. However, this will likely be an enforcement issue unless residents are in favor of significant modifications such as converting to one-way.

Comment 25: Comment noted.

Comment 26: Comment noted.

Comment 27: There was an error in the signal timing for this intersection. The table has been revised.

Comment 28: The study area was defined during the scoping process in coordination with M-NCPPC Montgomery and Prince George's counties. An analysis of the weaving areas was not requested at that time.

Comment 29: See response to comment 28.

Comment 30: Comment noted.

Comment 31: The Tech Road volumes are revised. During scoping with MNCPPC, the project team was directed to utilize volumes from Sabra, Wang & Associates' White Oak Local Area Transportation Review Intersection Improvement Cost Evaluation Memo, with the approval of the Montgomery County Planning Department, to ensure that the studies were consistent. Furthermore, it is our opinion that the volumes provide a reasonable representation of peak period traffic through the study area and that volumes likely change over time and from day to day with some volumes increasing, while others decrease.

Comment 32: See response to comment 31.

Comment 33: During scoping with MNCPPC, the project team was directed to utilize volumes from Sabra, Wang & Associates' White Oak Local Area Transportation Review Intersection Improvement Cost Evaluation Memo, with the approval of the Montgomery County Planning Department, to ensure that the studies were consistent. High U-Turn volumes were not noted during scoping and were not observed during field visits. Incorporation of the U-turn movements would likely not change the overall findings of the study for this intersection as it currently experiences heavy levels of congestion that are not easily mitigated without signficant intersection modifications.

Comment 34: No additional parking beyond what is programmed will be provided.

Comment 35: Text will be revised to note this possibility in Section 5.2.3.2

Comment 36: The TMP has been updated (see page iv).

Comment 37: The TMP has been updated (see page 4).

Comment 38: The TMP has been updated (see page 4).

Comment 39: The TMP has been updated (see page 6).

Comment 40: The TMP has been updated (see page 8).

Comment 41: The TMP has been updated (see page 8).

Comment 42: The TMP has been clarified (see page 11).

Comment 43: Based on coordination with Montgomery County, it was determined that the study should assume the already-planned County improvements identified in the White Oak Master Plan.

Comment 44: The TMP has been revised (see page 48).

Comment 45: As the TMP is implemented FDA/GSA will work with the County and other stakeholders to provide additional connections to park-and-ride facilities and/or new facilities.

Comment 46: Please see response to Comment 14.

MONTGOMERY COUNTY FIRE AND RESCUE SERVICE

Isiah Leggett
County Executive

Scott E. Goldstein
Fire Chief

April 5, 2018

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

Dear Mr. Gyamfi:

Thank you for the opportunity to provide comments concerning the Draft Environmental Impact Statement (EIS) for the Master Plan of the Food and Drug Administration (FDA) Headquarters Consolidation at the Federal Research Center (FRC) at White Oak. Upon reviewing the Draft EIS, the Montgomery County Fire and Rescue Service (MCFRS) has the following suggested changes to increase accuracy concerning fire, rescue and emergency medical services (EMS) provided by MCFRS to the FRC-FDA facility:

- Page X (Executive Summary), Action Alternatives heading, 1st sentence: Change "stations" to "services," and insert "approximately" before "75…." #1
- Page 20, 2nd comment under "Community Services/Amenities" heading: Reword as: "Hillandale Volunteer Fire Department Station 12 expansion." #2
- Page 133, Section 3.11.1, 1st sentence: Insert "emergency" before "medical." #3
- Page 133, Section 3.11.1, 2nd sentence: insert "EMS" after "fire protection" (i.e., "MCFRS provides fire protection, EMS and rescue services …"), and change "100,000" to "120,000 emergency calls." #4
- Page 133, Section 3.11.1, 3rd sentence: Reword as: "The MCFRS is staffed by approximately 1300 uniformed and civilian career personnel plus approximately 900 volunteers who provide direct emergency services." #5
- Page 133, Section 3.11.1, 4th sentence: Change "40" to "35 fire stations and two rescue stations." #6

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www.montgomerycountymd.gov/mcfrs

- Page 134: #1 in the map legend should be reworded as: "Hillandale Volunteer FD Station 12." #7
- Page 136, Section 3.11.2, Action Alternatives heading, 2nd sentence: Insert the word "approximately" before "75…." #8
- Page 136, Section 3.11.2, Action Alternatives heading, 3rd sentence: Insert after the word "which," the words "along with Station 12," would address the anticipated call load. [Need to insert a period after "call load."] #9
- Page 136, Section 3.11.2, Action Alternatives heading, 4th sentence: Begin new sentence with "At…." #10
- Page 136, Section 3.11.2, Action Alternatives heading, 5th sentence: Change "safety" to "emergency" vehicles. #11
- Page 154, 3rd paragraph under Alternative A: Starting here and going forward in the document, refer to the former on-site fire station (Building 100) as the "**historic** fire station" as done on page 153, 2nd paragraph, or refer to it as the "**former** fire station." Otherwise, it gives the impression of an operational fire station on site. #12

Thank you for considering our comments. Should you have any questions or require additional information or clarification, please contact Mr. Scott Gutschick, Planning and Accreditation Section Manager, at scott.gutschick@montgomerycountymd.gov or on 240-777-2417.

Sincerely,

Scott E. Goldstein
Fire Chief

SEG/sg

Montgomery County Fire and Rescue April 5, 2018 Chief Scott Goldstein

Comment 1: The EIS has been updated.

Comment 2: The EIS has been updated.

Comment 3: The EIS has been updated.

Comment 4: The EIS has been updated.

Comment 5: The EIS has been updated.

Comment 6: The EIS has been updated.

Comment 7: The EIS has been updated.

Comment 8: The EIS has been updated.

Comment 9: The EIS has been updated.

Comment 10: The EIS has been updated.

Comment 11: The EIS has been updated.

Comment 12: The EIS has been updated.

0	Agency	Division	Team	Commenter	Page	Section	Comment
1	MCDOT	DO	Policy	GE	Appx G	General	What is the estimated cost of the identified needs, proposed infrastructure, programs, and facilities? And how will these be funded and implemented?
2	MCDOT	DO	CSS	SLB	General	General	It is not clear from the document what the plan is for phasing in the expansion - i.e. over what period of time til full build-out, and how much space/increase in # employees at intervals along the way. This is critical to know in terms of assessing how well the infrastructure matches up with the expansion and what will be necessary to have in place to accommodate the planned growth - i.e., to comply with the County's APF approach.
3	MCDOT	DO	Policy	AB	General	General	Have any staging triggers been considered for implementation? Such triggers might help ensure that the pace of parking infrastructure does not exceed the pace of growth (maintaining the ratio), and that the pace of growth does not exceed the pace of off-site infrastructure (ensuring the transportation network is capable of supporting growth).
4	MCDOT	DO	Policy	AB	General	General	Replace all references to White Oak LATR with either "White Oak LATIP" or "White Oak LATR / LATIP"
5	MCDOT	DO	Policy	CC	General	General	Consider whether any publicly accessible street connections (perhaps along Perimeter Road?) may be feasible through the site, particularly between New Hampshire Ave and either the VIVA development or Cherry Hill Road.
6	MCDOT	DO	Policy	AB	ii	Purpose of the Proposed Action	Confirm how the number of employees in the 1 : 1.8 ratio is derived, considering the significant difference between the employee capacity of the facility and the actual number of employees on campus on a typical day. Based on analysis by MNCPPC it appears this actual ratio -- based on daily data -- may be nearer to 1 : 1.6
7	MCDOT	DO	Policy	AB	ii	Purpose of the Proposed Action	Consider the feasibility of utilizing a parking ratio of 1 space per 1.8 typical daily employees earlier in the implementation process, but reducing relative parking supply by approaching a ratio of 1 space per 2 typical daily employees later in the implementation process, as non-auto facilities and programs become fully functional. [note that in Appx A (Appx Part 1 p12) it is noted that between 1.5 to 2.0 is typical, and NCPC recommended that a rate be used nearer to 1 : 2.0]
8	MCDOT	DO	CSS	SLB	xi	Impacts to Traffic & Transportation	Beneficial impacts to bicycle access from Action Alternatives should reference addition of bike infrastructure not just sidewalks.
9	MCDOT	DO	Policy	AB	120, 205		White Oak Town Center (#4) is incorrectly located. It is actually located in the block surrounded by Tech Rd, Industrial Pkwy, and Prosperity Dr.
10	MCDOT	DO	Policy	AB	174-175		US 29 Corridor Interchanges - While we understand this analysis' intent with not considering the interchanges, it is important to be aware that the remain in the applicable master plans as well as in the Constrained Long Range Plan (CLRP). They are also acknowledged in the White Oak LATR/LATIP as the ultimate treatment for the intersections along US 29. The identified at-grade mitigation treatments do not fully address the traffic needs of the intersections, and the mitigation treatments themselves create physical impacts that can adversely affect non-auto users. We feel that this analysis reinforces the need for grade separation.

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11	MCDOT	DO	CSS	JJC, SLB	188	Biking	Section 3.13.2.3 states (on p187) that "bicycle facilities are relatively limited within the study area" and details some existing off-site facilities as well as their limitations, but on p188 the Action Alternatives only address on-site sidewalks and a general bike compatibility (without any further elaboration). Consider elaborating on the definition used for "bike compatible" (we urge that protected bikeways be provided throughout the campus) and also consider the needs and adequacy of bike facilities outside of the campus.
12	**MCDOT**	**DO**	**Policy**	**AB**	**Appx G**	**General**	**While there was significant analysis of vehicular conditions, there was minimal analysis of pedestrian, bicycle, and/or transit conditions as per the County's Subdivision Staging Policy (SSP).**
13	MCDOT	DO	Policy	AB	Appx G	General	Were there any evaluation of security gate processing capacity, and whether the gates as envisioned will be adequate without queueing into preceding transportation facilities?
14	**MCDOT**	**DO**	**Policy**	**AB**	**Appx G page ii**	**Employee Survey**	**Are telecommuting rates anticipated to change into the foreseeable future? Recent indications have been that telecommuting may be significantly curtailed in the federal sector. If so: reduced rates should be accounted for and the TIS updated accordingly.**
15	MCDOT	DO	Policy	AB	Appx G page iii	Additional Roadway Capacity	Much of White Oak is located in a Bicycle/Pedestrian Priority Area (BPPA), and accordingly: separated free-right movements are to be avoided to the fullest extent feasible. This may conflict with a number of proposed right-turn treatments.
16	**MCDOT**	**DO**	**Policy**	**AB**	**Appx G pages iii, 61**	**Additional Roadway Capacity**	**[repost of previous comment in main document, p174-175]** **US 29 Corridor Interchanges - While we understand this analysis' intent with not considering the interchanges, it is important to be aware that the remain in the applicable master plans as well as in the Constrained Long Range Plan (CLRP). They are also acknowledged in the White Oak LATR/LATIP as the ultimate treatment for the intersections along US 29.** **The identified at-grade mitigation treatments do not fully address the traffic needs of the intersections, and the mitigation treatments themselves create physical impacts that can adversely affect non-auto users. We feel that this analysis reinforces the need for grade separation.**
17	**MCDOT**	**DO**	**Policy**	**AB**	**Appx G pages iii, 51-56, 62-64**	**Additional Roadway Capacity**	***US 29 and MD 650 Corridors*** **- This recommends reducing the cycle lengths to 150 seconds. Confirm whether other signals in the clusters (which may include more signals than were within the study area) were evaluated at 150 seconds, and if not: how changing all other signals in the corridor to 150 seconds would affect both motorist and non-motorist operations.**
18	MCDOT	DO	Policy	AB	Appx G page iii, 51, 62	Additional Roadway Capacity	*650 / Schindler / Mahan* - The WB double-right would necessitate a separate controlled pedestrian interval to separate peds and right-turns. Confirm whether this was evaluated, or how pedestrians are intended to be safely accommodated.
19	MCDOT	DO	Policy	AB	Appx G page iii, 52, 62	Additional Roadway Capacity	*SW Loop Road/NW Loop Road & Mahan Road/FDA Circle* - There appears to be a typo whereby "one" is misspelled as "on"
20	MCDOT	DO	Policy	AB	Appx G page iii, 52, 62	Additional Roadway Capacity	*SW Loop Road/NW Loop Road & Mahan Road/FDA Circle* - Consider how a shared thru/right and a free-flow right will be designed and operated, and whether motorists may disproportionately prefer the free-flow right as to affect the lane use factors assumed in the intersection analysis.
21	MCDOT	DO	Policy	AB	Appx G page iii-iv, 53, 62	Additional Roadway Capacity	*650 / Northwest / Michelson* - The WB double-right would necessitate a separate controlled pedestrian interval to separate peds and right-turns. Confirm whether this was evaluated, or how pedestrians are intended to be safely accommodated.

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22	MCDOT	DO	Policy	AB	Appx G page iv, 53, 63	Additional Roadway Capacity	*650 / Lockwood* - Clarify the WB lane uses. The text currently details restriping the existing four-lane L-L-LT-R to L-L-L-T, with no narrative toward how right-turns would be accommodated, or where space would come from if a new lane is being created to form a five-lane L-L-L-T-R configuration (as shown on p53). If L-L-L-TR lane uses are being proposed, consider how the shared thru/right lane would affect right-turning buses from the White Oak Transit Center.
23	MCDOT	DO	Policy	AB	Appx G page iv, 54, 63	Additional Roadway Capacity	*29/Tech/Industrial* - Clarify the location of the three-left turn lanes being proposed: SB 29 at Tech, SB 29 at Industrial, or at both locations? Given the next item about providing three lanes in each direction & the graphic on p54, it would appear this should be Industrial Pkwy.
24	**MCDOT**	**DO**	**Policy**	**AB**	**Appx G page iv, 54, 63**	**Additional Roadway Capacity**	***29/Tech/Industrial* - Consider how a 6-lane cross-section for Industrial Pkwy would fit within the context of the urban-envisioned Viva White Oak development. Does the proposed item at Tech/Industrial imply that Industrial would remain a 4-lane section east of Tech Rd?**
25	MCDOT	DO	Policy	AB	Appx G page iv, 54, 63	Additional Roadway Capacity	*29/Tech/Industrial* - Were the treatments proposed in the White Oak LATIP considered in this analysis?
26	MCDOT	DO	Policy	AB	Appx G page iv, 54, 63	Additional Roadway Capacity	*29/Tech/Industrial* - Clarify the need for three northbound lanes along Old Columbia Pike all turning right onto Industrial Pkwy.
27	MCDOT	DO	Policy	AB	Appx G page v, 54, 63	Additional Roadway Capacity	*FDA Blvd* - Consider how a 6-lane cross-section for FDA Blvd (even if only between B-5 and Cherry Hill Rd) would fit within the context of the urban-envisioned Viva White Oak development.
28	MCDOT	DO	Policy	AB	Appx G page v, 56, 64	Additional Roadway Capacity	*29/Fairland* - Did the analysis consider diversions due to the proposed turn restrictions whereby NB left-turning motorists instead turn at Musgrove? We believe a significant proportion of traffic may follow this route, changing traffic patterns at 29/Musgrove, OldColumbia/Musgrove, and OldColumbia/Fairland.
29	**MCDOT**	**DO**	**Policy**	**AB**	**Appx G page vi, 59, 65**	**Transit, Pedestrian, and Bicycle Facilities**	**Consider the role of bikeshare: whether docked/dockless bikes will be permitted on campus: whether they would be able to use the ped-only access point or if they would have to use street access points. 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.** **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.** **If Bikeshare would not be permitted into campus: consider a separate docked or dockless system internally within the campus.**
30	MCDOT	DO	Policy	AB	Appx G page vi, 59, 65	Transit, Pedestrian, and Bicycle Facilities	*2nd Bullet* - Consider providing bicycle U-racks at buildings, in addition to the secure covered bicycle parking noted (and especially where such facilities are infeasible). This may be even more critical if an on-site dockless bikeshare system is considered.

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31	**MCDOT**	**DO**	**Policy**	**AB**	**Appx G page vi, 59, 65**	**Transit, Pedestrian, and Bicycle Facilities**	***3rd Bullet*** **- Locate the transit center as near to the monumental entrance (along the perimeter road near Mahan) as feasible, as to reduce walking/biking distance to other points on campus. We envision that buses/BRT would, in the long-term, utilize the Mahan access, travel along the west side of the perimeter road & service an on-street stop, and continue along a road extension to Lockwood's transit center (and vice versa). Given this, consider how the transit hub's amenities might be extended to encompass an on-street BRT station.**
32	**MCDOT**	**DO**	**BRT**	**JC**	**Appx G page vi, 59, 65**	**Transit, Pedestrian, and Bicycle Facilities**	**3rd Bullet - As an alternative (or perhaps in addition to) the previous comment, given Montgomery County plans to develop a robust network of Bus Rapid Transit routes in this part of the county, including on US 29 (Federally-funded project to begin service in 2020), New Hampshire Avenue, and Randolph/Cherry Hill Roads, we recommend GSA/FDA consider partnering with the County on a more robust, larger transit center that would serve all of the bus lines in the vicinity of White Oak. The new transit center would likely be located just off campus and would replace the current, under-sized White Oak transit center with a larger facility.** **FDA could then connect employees between this new transit center and the campus with shuttles, bikeshare, and potential new pedestrian/bike connections between the campus and Lockwood Drive. We encourage GSA/FDA to think more broadly about these transit connections and how the campus connects with the larger transit network. This new transit center would not only serve FDA employees, but would be an asset to the surrounding community.**
33	MCDOT	DO	Policy	AB	Appx G page vi, 59, 65	Transit, Pedestrian, and Bicycle Facilities	*4th Bullet* - At the northwest corner of the FDA site: straighten the perimeter street at its intersection with Michelson, aligning it with the east side of the self-storage site located along Lockwood Dr. This would support a future connection between the perimeter road and Lockwood Dr (noted in a previous comment & also included in the White Oak master plan). This connector would allow for buses to directly serve the perimeter road the White Oak Transit Center. Without this connector, buses are more likely to remain along MD 650 past the FDA site -- necessitating that FDA provide last-mile connectivity from the 650/Mahan intersection.
34	MCDOT	DO	Policy	AB	Appx G page vi, 59, 65	Transit, Pedestrian, and Bicycle Facilities	Any proposed expansions of the shuttle program? New locations? Bus capacity? Frequency? Are shuttles limited only to FDA employees or are they accessible to visitors; the public? Appx G on p11 finds that increased shuttle frequency (12%) and coverage area (5%) are significant issues facing would-be shuttle users.
35	MCDOT	DO	Policy	AB	Appx G page vi, 59, 65	Transit, Pedestrian, and Bicycle Facilities	At the eastern access point into the VIVA White Oak property: consider whether a transit facility may be feasible on FDA property before entering into the secured area. We currently expect this could be an end-of-the-line stop for the Randolph Road BRT, and such a facility could allow buses to turn-around and layover. This site could also provide for internal FDA circulators to ferry passengers to/from the eastern side of the property, linking FDA not only with bus connections but with the VIVA development (expected to be a prominent source of both dining and housing options).

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36	**MCDOT**	**DO**	**Policy**	**GE**	**Appx G**	**General**	**There is an inconsistency between the 2017 Commuter Survey and this survey that should be addressed and reconciled.** **The 2017 Commuter Survey indicates:** **- 49.6% Drive Alone** **- 22% Telework** **- 14.4% Carpool / Vanpool** **- 11.5% Transit** **(response rate 9%)** **This EIS survey indicates:** **- 75% Drive Alone** **- unknown% Telework** **- 8.1% Carpool / Vanpool** **- 9% Transit** **(response rate 20%)**
37	MCDOT	DO	Policy	AB	Appx G page 3-5, 9	Employee Transportation Survey	Regarding statistical significance and verifying that bias has been reduced to the fullest extent possible, consider the following questions: - Figure 1 - How do the percent of employees per building compare to the actual estimate populations of each buildings? - Figure 3 - How does the heatmap of identified home locations correspond to zip code data from all employees and contractors on record? - Figure 8 - How does the survey-reported usage of the parking facilities correspond to actual recorded usage? - Figure 18 - How does the population at each office location correspond to the actual estimated population of each location? If there is a strong correlation being total data and respondent data: these would reinforce that the findings are statistically sound. If there is not a strong correlation, this could imply that local word-of-mouth played a part, and that social networks could potentially introduce a bias and contort the results.
38	MCDOT	DO	Policy	AB	Appx G page 5	Figure 3	It would be helpful to have this home location heat map overlaid with a map of transit options (including buses, shuttles, and Park & Ride facilities), particularly as it appears that significant shares of respondents live in a relatively few number of zip codes, and also that 53% of respondents indicated that they would use FDA shuttles if they served a P&R near to their home (per p15). This information could be of particular use in transit planning, particularly toward providing highly effective shuttle services.
39	MCDOT	DO	Policy	AB	Appx G page 8	Figure 7	There is a text overrun: "Parking benefits up to $255 per month (you would..."

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40	MCDOT	DO	Policy	AB	Appx G page 10	Figure 9	A takeaway from this graphic is that additional parking would increase the peak period traffic load on the surrounding network, boosting FDA's peak period generation by upwards of 44%. While an actual increase is likely to be less than 44% and also commensurate with the amount of additional parking provided, this reinforces that reducing the parking:employee ratio would be counterproductive toward the vision of this plan and the needs & limitations of the transportation network.
41	MCDOT	DO	Policy	AB	Appx G page 14	Figure 15	Is it a correct interpretation of this data to state that 71.3% of respondents feel that walking/biking is an option for them? If so: this is an extremely important finding and one with potentially significant meaning. This would lend great support toward the expansion and improvement of ped/bike facilities in the White Oak area.
42	MCDOT	DO	Policy	AB	Appx G page 17	Figure 18	It might be helpful if the results in this section could be separated by the transportation characteristics of the facilities, sorting between those with higher transit access and lower transit access. A suggested separation would be: HIGHER - Parklawn Dr, Rockville - Fishers Lane, Rockville - Rockville Pike, Rockville - Lansdown St, Rockville - Colesville Rd, Silver Spring LOWER - New Hampshire Ave, Silver Spring - Standish Place, Derwood - Industrial Dr, Gaithersburg
43	MCDOT	DO	Policy	AB	Appx G page 18	Figure 19	It would be helpful to have this home location heat map overlaid with a map of transit options (including buses, shuttles, and Park & Ride facilities), particularly as it appears that significant shares of respondents live in a relatively few number of zip codes, and also that 61% of respondents indicated that they would use FDA shuttles if they served a P&R near to their home (per p25). This information could be of particular use in transit planning, particularly toward providing highly effective shuttle services.
44	MCDOT	DO	Policy	AB	Appx G page 18	Figure 19	Consider merging this heat map with the FDA campus heatmap (p5, Figure 3) for any off-campus facilities anticipated to be closed and relocated to the FDA campus. As per previous comments, this would be extremely useful in planning for future transit services.
45	MCDOT	DO	Policy	AB	Appx G page 21	Figure 22	Is this same information available for on-campus respondents?

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46	MCDOT	DO	Policy	AB	Appx G page 23-25	Questions 20 through 25	It is important to consider that with a change in location, respondents may not have adequate information to properly judge how they may change their commute. There is unfamiliarity with transit options and stigmas of other areas of the country which respondents may be particularly susceptible to, particularly insofar as their opinions and willingness to utilize transit services. This is especially apparent in the split between the general opposition to most transit options, but the overwhelming interest (61%) in FDA shuttles. This appears indicative of a need toward educating workers of transit options, as well as potential (re)branding opportunities similar to the RideOn ExtRa bus.
47	MCDOT	DO	Policy	AB	Appx G page 26	Survey Conclusions	There are a number of spots with high concentrations of workers. Will be important for TMP to be able to coordinate them into carpools & vanpools, to shuttles and other transit services, or toward walking/biking.
48	MCDOT	DO	Policy	AB	Appx G page 27-29	Existing Public Transportation Facilities	Consider including a map of bus and shuttle routes.
49	MCDOT	DO	Policy	AB	Appx G page 27-29	Existing Public Transportation Facilities	Consider including the service span / hours of operation for each bus and shuttle.
50	MCDOT	DO	Policy	GE	Appx G page 27-29	Existing Public Transportation Facilities	Consider providing information on FDA ridership of these buses and shuttles.
51	MCDOT	DO	Policy	GE	Appx G page 34	Turning Movement Counts	Clarify how these study intersections were selected.
52	MCDOT	DO	Policy	AB	Appx G page 34	Turning Movement Counts	Consider providing a map showing locations of the turning movement counts.
53	MCDOT	DO	Policy	AB	Appx G page 36	White Oak Local Transportation Review	There is a typo in the second to last sentence: "The anticipate***d*** increase in employees..."
54	MCDOT	DO	Policy	AB	Appx G page 37-39	Study Network Intersection Improvements	Consider including concept layouts of each of the LATR/LATIP-identified treatments. Several are currently shown, and it may be informative to users of this document to receive the same information for the other identified projects.
55	MCDOT	DO	Policy	AB	Appx G page 37	Study Network Intersection Improvements	As the master plan analysis and the LATR/LATIP analysis reached conflicting findings at 650/Powder Mill, upon approval of the LATIP the Council left the details of the work undefined and assigned $5,000,000 to address to-be-determined needs at this location.
56	MCDOT	DO	Policy	AB	Appx G page 41	Additional Background Developments	Consider clarifying the location of the White Oak Town Center, detailed as being on the southeast corner of Old Columbia Pike / Industrial Pkwy. Geographically it is on the east corner of this intersection, but orthogonally (as Old Columbia Pike is considered to run north-south, and Industrial east-west) it is the northeast corner.

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57	MCDOT	DO	Policy	AB	Appx G page 43	Study Area Transit Enhancements	The last sentence of the 1st paragraph states that the Randolph Road BRT corridor would terminate at Tech Road. The White Oak Science Gateway Master Plan, however, extended this corridor to terminate within the VIVA site, along Industrial Pkwy / FDA Blvd. While there has not been any design on this project, we have given some tentative thought toward operations. Our current expectation is that the line would split at Randolph Rd / Old Columbia Pike: One line would travel down Old Columbia Pike, turn onto Tech Rd, turn onto Industrial Pkwy, and continue into the VIVA site. It would terminate in the vicinity of the VIVA traffic circle, ideally at an FDA transit facility as noted in a previous comment on Appendix G page vi. The other line would continue along Randolph / Cherry Hill, turning onto either Broadbirch or Plum Orchard to service Washington Adventist Hospital, where it would use B-5 and Cherry Hill Rd to loop around and terminate at the VIVA site. There is a potential that this line could someday be extended to Greenbelt Metro Station.
58	MCDOT	DO	Policy	AB	Appx G page 43	Study Area Transit Enhancements	The section on roadway projects included those included in LATR/LATIP. That same program also included a number of non-auto projects, including a new White Oak Circulator, a new Ride-On service, increased Ride-On 10 and 22 service, the Hillandale Transit Center, bus stop improvements, and Bikeshare.
59	MCDOT	DO	Policy	AB	Appx G page 43	Study Area Transit Enhancements	Consider also highlighting ped/bike projects anticipated in the area, particularly those included in the LATR/LATIP. The LATR/LATIP includes 8 bikeway projects in the White Oak policy area.
60	MCDOT	DO	Policy	AB	Appx G page 45	Site Trip Generation	While we concur with the methodology and assumption that mode splits would ultimately remain relatively consistent with existing on-site behavior, we feel it may be helpful to expand upon two considerations: - As employees from off-site locations are moved on-site, in the immediate nearer-term it is likely that mode split will temporarily skew more toward those of the off-site locations (a larger share of SOVs) than the assumed existing on-site mode splits (greater use of non-auto modes). It is likely that over the long-term, commuters will increasingly utilize other travel modes and this behavior will return toward the existing FDA baseline. Strengthened TMP/TDM programs will hasten this shift in behavior. - Peak Spreading will play an increasingly significant role if growth at the FDA campus exceeds the provision of associated infrastructure, or if people seeking parking choose to travel earlier.
61	**MCDOT**	**DO**	**Policy**	**AB**	**Appx G page 47**	**Figure 31**	**This appears to reflect the assumption that trip distribution will not significantly change from the home destinations of existing off-site employees, which given the survey results is not an unreasonable assumption in the shorter-term. However, it is likely that over the long-term (noting this analysis is for 2040): turnover in employee positions & changes in workers' residences will cause off-site home locations to shift to resemble the on-site home locations. We feel that the trip assignments being used may significantly underestimate the attraction of the US 29 corridor toward the north, in particular.**

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62	MCDOT	DO	Policy	AB	Appx G page 47	Figure 31	Need to improve legibility of this graphic.
63	MCDOT	DO	Policy	AB	Appx G page 46-47	Figure 31	The text on p46 states that Figure 31 includes On-Campus and Off-Campus data, but Figure 31 appears to include Off-Campus and New Employee data.
64	MCDOT	DO	Policy	AB	Appx G page 48	Table 16	Confirm street names. We understand that east of MD 650, the main entry is called Mahan Road rather than Schindler Drive (as given here), and that FDA Circle is formally called Mahan Circle.
65	**MCDOT**	**DO**	**Policy**	**GE**	**Appx G page 48-60**	**Tables 16, 17, 18**	**As noted in the first of these comments: the phasing of implementation of FDA's growth will be critical to understanding when each infrastructure project will be necessary. The analysis also assumes full-build of the LATR/LATIP-identified projects, which will similarly be implemented over time. Additional information is necessary to plan and coordinate implementation of necessary infrastructure.**
66	**MCDOT**	**DO**	**Policy**	**AB**	**Appx G page 60**	**Table 18**	**Intersections with FDA-contributed E/F. Need additional information as to how these can be addressed, as the analysis already accounts for non-auto modes. In cases where No Action is already an E or an F, does the comparable Action+MItigation fully mitigate the additional FDA traffic?** **- SW/NW Loop at Mahan/FDA, AM (No Action passing, Action+Mitigation E)** **- NW Loop at Michelson, PM (No Action passing, Action+Mitigation F)** **- 650/Powder Mill, AM/PM (No Action F/E, Action+Mitigation F/F)** **- 650/Lockwood, AM/PM (No Action F/E, Action+Mitigation E/E)** **- 29/Lockwood, PM (No Action passing, Action+Mitigation F)** **- 29/Stewart, PM (No Action F, Action+Mitigation F)** **- FDA Blvd / Industrial Pkwy, PM (No Action F, Action+Mitigation F)** **- 29/Industrial, PM (No Action F, Action+Mitigation F)** **- 29/Tech, AM/PM (No Action F/F, Action+Mitigation F/F)** **- 29/Musgrove, AM/PM (No Action F/F, Action+Mitigation F/F)** **- 29/Fairland, AM/PM (No Action F/F, Action+Mitigation F/F)**
67	MCDOT	DO	Policy	AB	Appx G page vi, 59, 65	Transit, Pedestrian, and Bicycle Facilities	Any proposed expansions of the shuttle program? New locations? Bus capacity? Frequency? Appx G on p11 finds that increased shuttle frequency (12%) and coverage area (5%) are significant issues facing would-be shuttle users.
68	MCDOT	DO	Policy	AB	Appx H page iii-iv	TMP	*From Appendix G, Page 8, Figure 6:* 29% on-campus (p8) and 26% off-campus (p24) identified need of a car for childcare drop-off / pick-up. What childcare programs are available on the FDA campus? 33% on-campus (p8) and 30% off-campus (p24) also identified Unpredictable Schedule as an issue necessitating a car. This could again play into childcare needs, but is also indicative of a need for education on Guaranteed Ride Home programs (on p15 and p20 it is noted that 83.5% of on-campus and 93.5% of off-campus respondents are not registered with GRH, and that a significant share would carpool/vanpool if they had GRH).

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69	MCDOT	DO	CSS	SLB	Appx H page iii-iv	TMP	Add enhanced Guaranteed Ride Home (GRH) programs (i.e., more than the 4x/year base offered by MWCOG program) as a modification to attract more non-auto users. Enhanced GRH could be offered thru existing MWCOG program or with a campus-specific program administered by the ETCs.
70	MCDOT	DO	Policy	AB	Appx H page iii-iv	TMP	Any there any potential treatments at security gates which could facilitate non-auto entry? Clearly defined ped/bike entry points that can allow users to bypass vehicular queues? Designated and well-signed visitor entry?
71	MCDOT	DO	CSS	SLB	Appx H page iii-iv	TMP	Require in all FDA contracts that all FDA contractors offer the same level of commuting benefits to their employees as are offered by FDA, so that contract employees will have the same incentive/disincentive system in place as FDA employees do when they make commuting decisions.
72	MCDOT	DO	CSS	SLB	Appx H page iii-iv	TMP	Design new buildings on campus with two-way visibility between lobby and approach area (e.g., passengers to transit bus drivers) and include port-cocheres with enough height to accommodate transit buses, shuttles and car/vanpools. This will enable protected waiting areas inside the buildings for transit and shuttle bus riders. It will give an advantage for those passengers over SOV drivers who must navigate to remote parking garages.
73	MCDOT	DO	CSS	SLB	Appx H page iii-iv	TMP	Provide Real Time Monitors for transit arrivals at all major buildings on campus, including the conference center. These should be located in lobby locations (and any other congregation points) at highly visible points for both employees and visitors. These signs can also provide other TDM-related information such as announcements about events - e.g., meeting of novice cycling commuters, Bike to Work Day registration is open. They can also be programmed with information relevant to FDA activities and events.
74	MCDOT	DO	Policy	AB	Appx H page iii-iv	TMP	There is little discussion on reverse commuting as a means of reducing traffic impacts. Acknowledging that SOVs are likely to remain a significant mode, consider means of diverting SOVs that are inconvertible into non-auto trips to utilize reverse as well as off-peak commutes. Consider partnering with owners/developers of residential properties toward the south to identify methods of marketing and attracting workers to reside in communities.
75	MCDOT	DO	Policy	AB	Appx H page iii-iv	Parking	Include a section on Parking, including mention of the 1 : 1.8 parking ratio.
76	MCDOT	DO	Policy	AB	Appx H page iii-iv	Parking	*[repost of previous comment from pages ii of the EIS main document]* Consider the feasibility of utilizing a parking ratio of 1 space per 1.8 employees earlier in the implementation process, but reducing relative parking supply by approaching a ratio of 1 space per 2 employees later in the implementation process, as non-auto facilities and programs become fully functional.
77	MCDOT	DO		AB, SLB	Appx H page iii-iv	Parking	Phase-in parking with the intent of keeping excess parking to a minimum at each point in the development. Adopt disincentives to SOV driving (one example listed below) that work to reduce the total amount of parking needed at full build-out. Do NOT build parking in advance of demand.
78	MCDOT	DO	CSS	SLB	Appx H page iii-iv	Parking	Require off-site parking for SOV commuters at park & ride lot locations convenient to their homes, with shuttles to the campus. To implement this in a more palatable way, alternate days for SOV commuters based on either geographic location or license plate or another factor, so that each SOV commuter would be permitted to drive to the campus on only selected days. Consider adopting Parking Cashout program (if possible within Federal employment/benefit guidelines).

0	Agency	Division	Team	Commenter	Page	Section	Comment
79	MCDOT	DO	Policy	AB	Appx H page iii-iv	Parking	Consider partnering with owners of various parking facilities (including Park & Rides and private lots) to charter dedicated spaces for FDA workers.
80	MCDOT	DO		SLB, AB	Appx H page iii-iv	Parking	Implement parking charges for employees, or at a minimum for those arriving in SOVs. Use these funds to offer enhanced incentives, better/more frequent shuttle services, etc. for non-auto mode commuters.
81	MCDOT	DO	Policy	AB	Appx H page iii-iv	Parking	Ensure that any transit subsidies / benefits provided are equal to or greater than parking benefits, and/or that beneficiaries have parking opt-out options that could further transit benefits.
82	MCDOT	DO	Policy	GE	Appx H page iii-iv	Parking	Give consideration of how best to accommodate carsharing (ZIpCar, Car2Go), electric charging stations, and rental cars at key locations around the campus.
83	MCDOT	DO	Policy	AB	Appx H page iii-iv	Parking	While there is significant discussion regarding the parking ratio for FDA workers, there does not appear to be as much focus on the parking ratio for visitors, including how to encourage non-auto options toward visitors.
84	MCDOT	DO	Policy	AB	Appx H page iii-iv	Parking	Consider how employees will be enforced from using visitors' parking spaces, and how visitor spaces might be structured and enforced for various forms of hourly usage (e.g. max 1 hr spaces, max 3 hr spaces, etc)
85	MCDOT	DO	CSS	SLB	Appx H page iii-iv	Employee Transportation Coordinator (ETC)	Require FDA to provide two representatives to the White Oak Transportation Management District Advisory Committee. One should be from the transportation management office; one should be an FDA employee.
86	MCDOT	DO	Policy	AB	Appx H page iii	Transit and Shuttles	Coordinate with the Maryland Transit Administration (MTA) on their Commuter Bus services. The 204 currently stops at FDA, and the 305, 315, and 325 all travel in the near vicinity as to potentially justify altering the routes. With a facility the size of FDA, a potential may exist for new Commuter Bus services to be developed.
87	MCDOT	DO	Policy	AB	Appx H page iii	Transit and Shuttles	*From Appendix G, Page 8, Figure 7:* A plurality of respondents indicate that operational improvements would encourage them to commute by transit. How is FDA proposing to address these desires, such as through increased direct coverage areas, service frequency, and/or longer operating hours?
88	MCDOT	DO	Policy	AB	Appx H page iii	Transit and Shuttles	Provision of midday shuttles to Lockwood & VIVA, particularly as they develop. For off-peak commuters as well as to serve lunchtime crowds.
89	MCDOT	DO	Policy	AB	Appx H page iii	Transit and Shuttles	Include participation in events such as Car Free Day and Park(ing) Day.
90	MCDOT	DO	Policy	AB	Appx H page iii	Transit and Shuttles	If they are not already, consider tracking all shuttles on GPS and integrating them into displays or waittime estimates available at shuttle stops and other congregation points (building lobbies, dining areas, etc)
91	MCDOT	DO	Policy	AB	Appx H page iii	Transit and Shuttles	Consider partnering with owners/developers of residential properties near key Park & Ride locations as well as toward high-transit areas such as downtown Silver Spring, Wheaton, Glenmont, Greenbelt, and even the District of Columbia (which could all feed into focal points for shuttle or bus services) to encourage residential selection of transit-served areas.
92	MCDOT	DO	CSS	JJC	Appx H page iv	Flexible / Alternative Work Schedules	Explore ways to shift more of the current employees away from the peak period commute. Offer incentives to managers and employees for working outside of the peak hours.

0	Agency	Division	Team	Commenter	Page	Section	Comment
93	**MCDOT**	**DO**	**Policy**	**AB**	**Appx H page iv**	**Bike/Walk to Work**	***[repost of previous comment on Appx G, pages vi, 59, 65]*** **Consider the role of bikeshare: whether docked/dockless bikes will be permitted on campus: whether they would be able to use the ped-only access point or if they would have to use street access points. 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.** **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.** **If Bikeshare would not be permitted into campus: consider a separate docked or dockless system internally within the campus.**
94	MCDOT	DO	CSS	SLB	Appx H page iv	Bike/Walk to Work	Capital and operating costs of station-based bikeshare throughout the FDA campus should be incorporated into the expansion budget, with at least one 19-dock station located at each building. This will reduce the need for dockless bikeshare, but facilities for parking both dockless and personal bikes should be located in quantity at each campus building as well.
95	MCDOT	DO	Policy	AB	Appx H page iv	Bike/Walk to Work	*From Appendix G, Page 15, Figure 16:* This figure indicates a number of potential TMP needs, including bike racks (3%), shower facilities (3%), and dedicated bike facilities at & through security gates (8%).
96	MCDOT	DO	CSS	SLB	Appx H page iv	Bike/Walk to Work	Provide locking bike storage rooms in all new campus buildings to provide secure storage for employees' bikes. Provide a bicycle repair station at each location.
97	MCDOT	DO	CSS	SLB	Appx H page iv	Bike/Walk to Work	Encourage walking and biking both to and around the campus by providing good lighting for sidewalks and bike paths, attractive but security-conscious landscaping, and safe pedestrian and bike crossings, including use of the latest technology for this purpose. The FDA campus - given its health-based mission - should provide state-of-the-art safety technology for non-vehicular as well as vehicular circulation. This should include incorporating the latest bike and pedestrian infrastructure circulation techniques and an ongoing educational campaign to ensure everyone on campus knows how to use that infrastructure.
98	MCDOT	DO	Policy	AB	Appx H page iv	Bike/Walk to Work	Noting survey respondents' concerns regarding crime (Appendix G): work with property owners along biking/walking paths both on-site and in the area to provide regular emergency Blue Light installations. These can provide emergency callboxes, percussive tamper alarms, and means for readily identify and responding to specific locations.
99	MCDOT	DO	Policy	AB	Appx H page iv	Bike/Walk to Work	Consider bike events & programs: regular group bike ride commutes (bikepools), etc
100	MCDOT	DO	Policy	AB	Appx H page iv	Bike/Walk to Work	Include participation in events such as Car Free Day, Park(ing) Day, and Bike to Work Day.
101	MCDOT	DO	Policy	AB	Appx H page iv	Bike/Walk to Work	Provide shoe/bike subsidies.
102	MCDOT	DO		JJC, AB	Appx H page iv	Live Near Work	Since there's no current program in place to encourage Live Near Your Work, explore ways to incentivize employees that live at Viva White Oak, Berkshire Towers or other nearby housing. Consider partnering with owners/developers of area residential properties to identify methods of marketing and attracting workers to reside in nearby communities.

0	Agency	Division	Team	Commenter	Page	Section	Comment
103	MCDOT	DO	Policy	AB	Appx H page iv	Smart Transportation Technology	Consider how Automated Vehicles might respond to and pass through security gates. If AVs might not be permitted into secured areas, consider how this might affect future trends in ridehailing / ridesharing services such as Lyft and Uber, or also how this might affect workers' choices in ownership of AVs. This would also affect where congregation points for these services should be located.
104	MCDOT	DO	Policy	AB	Appx H page iv	Smart Transportation Technology	If congregation points must be provided outside the secured area for services such as transit, ridehailing / ridesharing, accessing automated vehicles, etc., provide: - Amenities such as wifi, climate-controlled seating areas, etc. - Facilities such as clear ped/bike paths to these facilities from within the secured area, and adequate bike docks, racks, etc.
105	MCDOT	DO	CSS	SLB	Appx H page iv	Smart Transportation Technology	Initiate dynamic rideshare systems, especially targeted at employee residential clusters that are not suitable for carpool formation. This system may involve Uber-pool- or Lyft-line- type services. Depending upon when in the phasing of the project they are instituted, and what transit services are available within a reasonable distance of that residential area, they could either link with transit services or connect directly to the campus.
106	MCDOT	DO	CSS	SLB	Appx H page v	Monitoring	First bullet states ETCs at FDA should coordinate with HHS, GSA and MWCOG to obtain annual commuter survey data. However that survey data is primarily collected on a regular (usually bi-annual) basis by MCDOT/Commuter Services, not by the federal agencies listed and not by MWCOG. With the expansion of the FDA campus and the significant TDM effort required to achieve the commuting goals established, it would be appropriate for HHS and GSA to coordinate with FDA to collect this data on at least a bi-annual basis and provide it to MCDOT/CSS. The survey should be conducted in a way that provides the mode share, commuting times, residential location and other key data obtained through the MCDOT/CSS survey so that it can be analyzed in a comparable manner.

Montgomery County Department of Transportation

Comment 1: 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 estimate 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.

Comment 2: A phasing plan is provided in the Master Plan. However, given that many of the proposed roadway improvement recommendations expand upon the improvements already proposed by the County, it would be more strategic to implement the required mitigation for FDA at the same time as the previously identified County improvements, rather than timing the improvements based on FDA site phasing.

Comment 3: See response to comment 98.

Comment 4: The EIS and TTR have been revised to reflect this comment.

Comment 5: See response to comment 92.

Comment 6: Parking has been calculated as follows; 18,000 x 1/1.8 + 1,615 visitor parking spaces. This equals 11,615 spaces. A sensitivity analysis was performed early in the master planning process to identify the threshold at which major intersections along New Hampshire Avenue (MD 650), US 29, and Cherry Hill Road would begin to experience significant delays and queuing that would not easily be mitigated through minor roadway and signalization improvements, and would require improvements on a scale that would likely not be feasible. The results of the sensitivity analysis revealed that a parking ratio lower than the 1:1.5 permissible by NCPC, approximately 1:1.8, would be more appropriate. At a 1:1.8 parking ratio, approximately 10,094 parking spaces would be permitted for approximately 18,000 employees and support staff. Additional parking beyond the 10,094 would be required for visitors.

This has been clarified in the text. " "A sensitivity analysis was performed early in the master planning process to identify the threshold at which major intersections along New Hampshire Avenue (MD 650), US 29, and Cherry Hill Road would begin to experience significant delays and queuing that would not easily be mitigated through minor roadway and signalization improvements, and would require improvements on a scale that would likely not be feasible. The results of the sensitivity analysis revealed that a parking ratio lower than the 1:1.5 permissible by NCPC, approximately 1:1.8, would be more appropriate. At a 1:1.8 parking ratio, approximately 10,094 parking spaces would be permitted for approximately 18,000 employees and support staff. Additional parking beyond the 10,094 would be required for visitors.

Comment 7: Based on NCPC guidelines, a suburban facility that is not located in close proximity to a high-capacity transit stop, such as a Metrorail station, can have a parking ratio as high as 1:1.5. Results of a sensitivity analysis revealed that a lower parking ratio, approximately 1:1.8, would be more appropriate given the nature of the surrounding roadway network, resulting in an extremely aggressive NADMS goal of 46%. Given the limited implementation of the BRT (i.e. no dedicated lanes, queue jumpers) it is our opinion that the level of service would not equal that of a high-capacity Metrorail station, and thus not warrant a parking ratio of 1:2.

Comment 8: On-site multi-use pathways and/or bike lanes will be recommended to connect the internal buildings with external facilities on New Hampshire Avenue and FDA Boulevard/Cherry Hill Road. The text will be revised to discuss these in greater detail and pull in information from the most recent bicycle master plan.

Comment 9: This figure has been revised to show the correct location.

Comment 10: As noted in the TTR, improvements like grade separation, which was previously planned by MDDOT SHA for signalized intersections along Columbia Pike (US 29), would need to be coordinated through MD SHA and Montgomery County. Conversion of the at-grade intersections to interchanges is a long-term project; therefore, the Action Alternatives with Mitigation scenario evaluates the short-term enhancements only. It is assumed that

delay and queuing at the intersections along US 29 and the intersection of MD 650 & Powder Mill Road would be mitigated once they are converted to interchanges.

Comment 11: Bicycle and pedestrian infrastructure recommendations have been expanded.

Comment 12: The site will add very little pedestrian and bicycle trips to the transportation network and all transit trips are contained onsite. An expanded discussion of bicycle and pedestrian infrastructure and recommendations is provided in the traffic technical report.

Comment 13: No analysis has been conducted. FDA is committed to efficient processing of incoming employee vehicles and will be adjusting their processing methods in order to accommodate the incoming vehicles. Details are not yet known at this level.

Comment 14: Based on coordination with FDA and GSA, telecommuting rates at the FRC are anticipated to remain the same.

Comment 15: The only additional free right-turn movement being proposed as part of the recommended mitigation is at Cherry Hill Road and FDA Boulevard. The ultimate design for this intersection could be modified in the future, before construction, to provide a controlled crossing at this location if one is desired.

Comment 16: As noted in the TTR, improvements like grade separation, which was previously planned by MD SHA for signalized intersections along Columbia Pike (US 29), would need to be coordinated through MD SHA and Montgomery County. Conversion of the at-grade intersections to interchanges is a long-term project; therefore, the Action with Mitigation scenario evaluates the short-term enhancements only. It is assumed that delay and queuing at the intersections along US 29 and the intersection of MD 650 & Powder Mill Road would be fully mitigated once they are converted to interchanges.

Comment 17: This is a master-planning-level study that is intended to identify mitigation options. A more detailed assessment of mitigation will be conducted as the site is programmed and off-site improvements begin to be finalized.

Comment 18: This is a master-planning-level study that is intended to identify mitigation options. A more detailed assessment of mitigation will be conducted as the site is programmed and off-site improvements begin to be finalized. However, given the anticipated low pedestrian volumes, we would recommend a lead-pedestrian interval, and/or permitting pedestrian movement only with the Schindler Drive.

Comment 19: The EIS has been updated.

Comment 20: Upon relocation of the transit center, through traffic is anticipated to be significantly reduced. While we recognize that the free right turn will be preferred by most drivers and will be the preferred method of the entry, the shared-through right lane will serve as a "relief valve" if entering traffic exceeds single lane capacity.

Comment 21: This is a master-planning-level study that is intended to identify mitigation options. A more detailed assessment of mitigation will be conducted as the site is programmed and off-site improvements begin to be finalized. However, given the anticipated low pedestrian volumes, we would recommend a lead-pedestrian interval, and/or permitting pedestrian movement only with the Schindler Drive.

Comment 22: The text will be revised to indicate a L-L-L-T-R configuration as shown on Page 53

Comment 23: The three SB left-turn lanes are provided at Industrial Parkway only.

Comment 24: The six lanes would be provided only to Tech Road. The interchange may negate the need for this improvement.

Comment 25: All proposed improvements in the LATIP were accounted for in the No Action Alternative.

Comment 26: Three right-turn lanes were required to process the anticipated demand volume of over 2,000 vph in both the AM and PM peak hours.

Comment 27: The purpose of this traffic technical report is to support the EIS in the identification of potential impacts and the mitigation that would be required to offset those impacts. If a six-lane cross-section is desired, then this can be evaluated further upon project implementation.

Comment 28: Diversion to the roundabout on Fairland Road was considered. The analysis has been revised to account for a diversion to Musgrove as well.

Comment 29: FDA/GSA will look at the feasibility of providing docking bikeshare stations and providing service/rebalancing of the docking stations on the White Oak Campus outside of the secure perimeter.

Comment 30: This has been noted in the revised text.

Comment 31: FDA will work with Montgomery County to address the feasibility of providing regular shuttle service to key BRT stations in the vicinity of the White Oak Campus.

Comment 32: Comment noted.

Comment 33: This would require relocation of the security entrance. Relocation of the security entrance is not being considered at this time. FDA/GSA will work with the County to identify potential alternatives.

Comment 34: Modifications to the existing shuttle services are discussed in the Transportation Management Plan (TMP) document. We will reference this document in this section of the TTR.

Comment 35: FDA is not currently considering an additional transit hub that they have to maintain on the eastern end of the property. However, the TMP recommends regular shuttle connections to the Viva White Oak development. FDA would likely be able to provide shuttle service to a transit hub located on or near the Viva White Oak development.

Comment 36: The survey conducted for TTR and TMP had a larger response rate and more varied respondent base. It should also be noted that the commute mode question asked how an employee commutes to the campus. Given that less than 1% of respondents indicate that they telecommute every day of the week, "telecommuting" would not be a reasonable result of this question given that most employees (91%) travel to/from campus at least 3-4 days per week. Furthermore, the reported 75% drive-alone rate is consistent with the fact that the current parking facilities are at or over capacity, particularly Tuesday-Thursday. Based on our experience with the County Commuter Survey, there tends to be a bias in responses to non-auto users, which may be one reason why the 2017 survey indicates a significantly low number of drive-alone commuters. A drive-alone mode share of 49% would be expected where there is a high-frequency mass-transit option. This does not exist to/from the FDA campus.

Comment 37: FDA provided building population numbers for comparison. This information has been added into the TTR and TMP.

Comment 38: A map has been provided in Section 5.2.3 of the TMP (Appendix H). Text has been added to direct readers to the TMP.

Comment 39: The text has been revised.

Comment 40: While additional parking would be counter-productive, the proposed parking ratio results in parking only being provided for 54% of employees. Therefore, FDA must work toward a NADMS goal of 46%, which is a significant target in a suburban environment.

Comment 41: The percentages shown in Figure 15 are of the 4% who walk to work, not of all employees.

Comment 42: The survey asks respondents how their commute would change if they move from their current office to the White Oak Campus. While we recognize that familiarity with transit may result in an employee being more likely to use transit in certain situations, the reported anticipated mode choice is made based on several more critical factors, such as transit options, number of seat changes, and access from residence to transit. Therefore, breaking down survey results based on existing office location is not likely to impact overall trends for the White Oak campus. Furthermore, the survey results are aggregated, and we do not have a efficient way to separate responses based on office location.

Comment 43: A map has been provided in Section 5.2.3 of the TMP (Appendix H). Text has been added to direct readers to the TMP.

Comment 44: A map has been provided in Section 5.2.3 of the TMP (Appendix H).

Comment 45: Yes, a similar chart for on-campus respondents has been provided.

Comment 46: Education of employees is part of the TMP and the responsibilities of the ETC staff. The TMP recommends regular engagement with employees, providing transit, ped, bike, and user groups, and providing new hires with information.

Comment 47: The TMP recommends a variety of strategies including shuttles to park-and-ride facilities as well as ridesharing.

Comment 48: FDA does not maintain maps of shuttle routes.

Comment 49: Shuttle information has been provided.

Comment 50: Comment noted.

Comment 51: Study intersections were selected based on the direction from MCPD in the scoping phase. See Page 33 first paragraph.

Comment 52: A map has been provided in TTR Appendix D.

Comment 53: The text has been revised.

Comment 54: The LATR/LATIP will be referenced as an appendix.

Comment 55: Comment Noted

Comment 56: Comment Noted

Comment 57: The text has been revised to indicate the various options for this BRT line.

Comment 58: These non-auto improvements are included in the revised text.

Comment 59: Revised. See pages 41-42.

Comment 60: Comment Noted

Comment 61: While we agree, we are basing the analysis on the available information at the time of the study. Furthermore, it is unlikely that a shift north would have a significant impact on the overall study infrastructure improvement recommendations as most are intended to address both northbound and southbound traffic utilizing US 29.

Comment 62: This graphic has been revised.

Comment 63: This have been revised.

Comment 64: Street names have been verified and any necessary changes have been made.

Comment 65: The purpose of this traffic technical report is to support the EIS in the identification of potential impacts and the mitigation that would be required to offset those impacts. A phasing plan is part of the Master Plan. GSA will coordinate the transportation improvements, where practicable.

Comment 66: Mitigation measures were developed to the extent reasonable to address the increase in delay and queuing associated with the proposed action. Factors such as available ROW or the potential for ROW takings was considered to determine what would be reasonable. In many cases the intersections operate at LOS E or F in the No Action. A chart has been added to show how the average vehicle delay changes between the various scenarios.

Comment 67: Shuttle modifications are discussed in the TMP. A reference to the TMP has been included.

Comment 68: There is currently a childcare center onsite that is at capacity. However, there are no plans to expand the childcare services as part of the Master Plan.

Comment 69: Text will be revised to include this recommendation as an option.

Comment 70: Recommendations have been added to permit ped/bike entry at security gates.

Comment 71: The Federal Government follows the Federal Acquisition Regulations for the procurement of good and services. As an executive agency, FDA is required to follow these regulations.

Comment 72: Buildings have existing lobbies which are used for waiting for the shuttle. Because the FDA Campus is a secured Federal facility, transit buses cannot be accommodated at individual buildings. FDA provides an internal shuttle service from all its buildings that connects employees with transit buses.

Comment 73: Text will be revised to include this recommendation as an option. See section 5.2.1

Comment 74: A recommendation for off-peak commuting is made in the TMP (referred to as flexible work schedule). Based on FDA/GSA feedback, they cannot contact or partner with residential properties to provide employee incentives. These incentives will likely happen naturally. However, recommendations are made to provide ped/bike as well as regular circulator shuttle connections to transit stops near major nearby properties/developments such as Viva White Oak.

Comment 75: A section on parking has been added in Section 5.2.9, and a summary has been provided in the table in the Executive summary.

Comment 76: GSA/FDA will continue to monitor parking needs. However, at this time it is our opinion that a 1:1.8 ratio is most appropriate. While the BRT will provide some higher-frequency and faster transit options it would not have the same level of "attraction" as Metro. The 1:2 ratio set by NCPC is intended for areas served by higher-frequency transit like Metro.

Comment 77: The majority of the additional parking provided will be structured. Road and parking improvements will be built in coordination with the phasing plan in the Master Plan.

Comment 78: The TMP includes recommendations for shuttle connections to/from park-and-ride facilities, as well as partnering with a ridesharing firm to provide on-demand vanpool services in areas with a high concentration of employee residences (see Section 5.2.4). FDA cannot require employees to park off-site. Based on current federal regulations, parking cash-out is not allowable.

Comment 79: Recommendation has been added.

Comment 80: The FDA has established a long-term commitment to reducing the traffic impact of its employees commute to work. This commitment is demonstrated by its highly successful and award-winning transportation demand management program. FDA achieved this success through offering progressive commuting enhancements to its employees that make its White Oak Campus a more attractive place to work by subsidizing, supplementing, coordinating, encouraging and marketing the convenience of alternative travel modes. FDA's transportation demand management program is among the most successful in the region for a site that is not served by Metrorail.

FDA is a regulatory agency that employs individuals with scientific and medical backgrounds who are in high demand and difficult to recruit. These same personnel often have other opportunities to work at other science-based agencies in the local area including the National Institutes of Health, the National Cancer institute, the National Institute for Standards and Technology, the National Aeronautics and Space Administration in addition to having opportunities to work for scientific private sector companies. To charge a fee to FDA employees for parking is regressive, antithetical to FDA's successful approach to demand management, and it would have a negative impact to FDA's mission.

Charging employees for parking is regressive because it most significantly impacts FDA personnel who can afford it the least; especially new recruits who typically join the government at a lower pay scale and who may be joining FDA after many years of graduate education and post-graduate work. As a strategy, charging for parking will disadvantage FDA's ability to recruit and retain the individuals needed to fulfill its mission.

For a suburban campus without Metrorail access, the parking ratio of (1:1.8) is relatively low and in itself will serve as a deterrent to single-occupant vehicle commuting. As parking for carpools and vanpools is prioritized in the transportation management plan, parking for single occupant vehicle commuters will be available for substantially less than 54 percent of the personnel assigned to the site.

Logistically, charging for parking presents multiple operational challenges. The collection of parking fees, the delay in access to parking and the administrative requirements to manage the collection of fees is not cost-effective or cost-beneficial. The collection of parking fees will cost the agency funds and loss productivity, unless the fees raised are set sufficiently high to cover all cost of collection and administration. Setting fees sufficiently high enough to cover the operating cost will impact lower paid personnel who may not have the option to take an alternative mode and who can least afford to pay for parking.

The immediate market area of the White Oak Campus has no known precedence for charging personnel for parking. As the White Oak Campus is a GSA property, there is no established policy or precedent for charging federal employees in suburban locations that are not served by Metrorail for daily parking. In light of the regressive and negative impact of this strategy; the absence of established GSA policy for charging for parking on suburban campuses; and the absence of federal regulations that would allow agencies to provide employees a "parking cash-out"; FDA will continue its progressive approach by building on its success in the area of demand management by focusing on incentives and enhancements for alternative commuting modes that has proven effective reducing the traffic impact of FDA's growth at the White Oak Campus.

Comment 81: FDA's objective is to focus on providing incentives for other modes with the goal that they be equal to or greater than parking benefits. However, it should be noted that parking cash-out is not currently permitted under Federal regulations.

Comment 82: Text has been expanded to discuss this further (see Sections 5.2.8.3 and 5.2.8.4)

Comment 83: FDA will provide transit directions in addition to vehicle directions for visitors. However, it is anticipated that, other than large conferences which will happen infrequently, visitors would largely continue to arrive to the site via vehicle.

Comment 84: Access to visitor parking is controlled from the security gate visitor screening area. Employees would not have access to this parking.

Comment 85: Text has been revised.

Comment 86: Text will be revised to include this recommendation as an option.

Comment 87: The TMP includes recommendations for shuttle connections to/from park and ride facilities, connections to BRT and Purple Line, adjustments to existing bus routes, and ridesharing services.

Comment 88: The TMP recommends a circulator shuttle that is expanded to include transit stops near these developments. Federal regulations prohibit FDA shuttle services from serving developments directly - only transit facilities can be served.

Comment 89: Text will be revised to include this recommendation as an option.

Comment 90: Text will be revised to include this recommendation.

Comment 91: This was initially considered. However, Federal regulations prohibit partnering with specific developments.

Comment 92: The TMP includes recommendations for flexible work schedules/CDO/telework.

Comment 93: The purpose of this traffic technical report is to support the EIS in the identification of potential impacts and the mitigation that would be required to offset those impacts. If a six-lane cross-section is desired then this can be evaluated further upon project implementation.

Comment 94: GSA/FDA will look at the feasibility of and funding for bikeshare stations.

Comment 95: The TMP recommends bicycle parking and shower facilities. Text has been revised to recommend dedicated bike facilities through security. (See Section 5.2.7)

Comment 96: See Section 5.2.7.

Comment 97: The TMP has been expanded to discuss ped/bike facilities on campus in greater detail. However, it should be noted that this is a master plan level study (see Sections 4 and 5.2.7). Final design of facilities will be conducted at a later date.

Comment 98: Text has been revised. See section 5.2.7

Comment 99: Text has been revised. See section 5.2.7

Comment 100: Text has been revised. See section 5.2.7

Comment 101: FDA is presently continuing the bike subsidy benefit, however, for the time being it is now treated as a taxable benefit. FDA will not be considering a shoe benefit for its employees.

Comment 102: FDA cannot partner with specific developers/property owners. However, the TMP does include recommendations for expansion of shuttle services to nearby transit stops adjacent to these developments. Federal regulations prohibit FDA shuttle services from serving developments directly - only transit facilities can be served.

Comment 103: Unmanned AV's will not be permitted to enter the secured area of the campus. AV pick-up will be handled at the transit center, or in front of Building 1. Employees that arrive via personal AV will be able to enter through security provided that the vehicle does not leave the secure area without the employee.

Comment 104: Comment Noted

Comment 105: This is discussed in Section 5.2.4.

Comment 106: Text has been revised.

MONTGOMERY COUNTY PLANNING DEPARTMENT
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

April 13, 2018

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

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

Dear Mr. Gyamfi:

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

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

[illegible] Georgia Avenue, Silver Spring, Maryland 20910 [illegible]
www.MontgomeryPlanning.org

Background

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

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

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

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

#1

After reviewing the Draft EIS, which includes a total of four alternatives, one of which is a no-build alternative, the Montgomery County Planning Department staff has the following comments organized by the topic areas of environment, historic preservation and urban design, and transportation.

Environment

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

Sewer Capacity
The Draft EIS acknowledges that the additional development associated with the planned expansion of the FDA campus has the potential to create sewer overflows. Some potential mitigation strategies are suggested in the Draft EIS, however, GSA should coordinate with developers of neighboring properties to be a part of any solution for the sewer expansion necessary for development. #2

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

Forest Loss
The Draft EIS discusses the loss of vegetation, but no diagrams are provided to show the areas proposed for clearing. While the detailed numbers of acres being cleared is important, the amount of fragmentation is also important and should be considered. Alternative A will cause more damage to the forest than the clearing of acres indicates. #4

Mitigation
The Draft EIS does not include any specific areas of mitigation or types of mitigation and only includes a list of techniques in the Environmental Guidelines. Given the location of the #5

development, the first preference for mitigation would be planting forest on steep slopes in stream valley buffers.

#5 cont.

Historic Preservation and Urban Design

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

#6

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

#7

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

#8

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

Figure 1: Environmental setting for the NOL identified for the county Locational Atlas.

Viewshed from New Hampshire Avenue

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

#9

Historic Golf Course Buffer

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

#10

Transportation

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

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

#11

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

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

Planned Connection between FDA and the White Oak Center

#12

The WOSG Master Plan recommends a "Connection to FDA" between White Oak Center at the corner of New Hampshire Avenue and Lockwood Drive and FDA's campus. In the

Master Plan, this connection was intended to be primarily a pedestrian and bicycle link for FDA employees, between FDA and the White Oak Center's existing and future amenities. #12 Cont.

The Planning Department supports a vehicular connection in addition to a pedestrian and bicycle link in this location to improve transportation access in the White Oak area, as recently suggested by MCDOT in their review of the EIS. This would be a major improvement to connectivity in the area. FDA should coordinate with MCDOT to facilitate the creation of this connection. #13

Bicycle and Pedestrian Connections

The EIS Transportation Management Plan discusses implementing a multi-use path for people that walk and bike on the FDA campus and to provide potential connections to Montgomery County's bikeway systems. FDA should coordinate the design and future connections with the Planning Department. The Planning Board Draft of the Bicycle Master Plan should be available by early May 2018 and the plan is expected to be approved by the Council in the fall of 2018. The Final EIS should identity the proposed location of the multi-use path and should align with the final approved and adopted Bicycle Master Plan. #14

Other improvements should include, but not be limited to, the following: #15

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

Parking

Currently on the FDA campus there are 6,817 parking spaces for 10,987 employees. However, due to teleworking programs and other working options, the average number of employees present at the office on a weekday is 7,793 employees. Therefore, the average parking ratio on the site is 1 space per 1.14 employees, not 1 space per 1.6 employees, as stated in the EIS. #16

The proposed parking in the EIS should follow the federal facility parking ratio policies established in the National Capital Planning Commission's (NCPC) Comprehensive Plan which recommends a range of 1 space for 1.5-2 employees. Consistent with the NCPC Comprehensive Plan, as teleworking trends continue to increase regionally, and to support the #17

goals of reducing single occupancy vehicle trips and support transit ridership, the Final EIS should include 1 parking space per 2 employees.

#17 Cont.

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

#18

Memorandum of Understanding

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

#19

Conclusion

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

Sincerely,

Gwen Wright

Gwen Wright
Director

Montgomery County Planning Department April 13, 2018 Gwen Wright

Comment 1: The impacts of the BRT and the Transit Station are discussed in greater detail in the TMP (Appendix H). The impact of the BRT is accounted for in the trip reduction credits assumed in the traffic study (Appendix G). The TMP text (Appendix H) has been revised to discuss connection to White Oak Center and bike sharing efforts.

Comment 2: Comment noted.

Comment 3: SWM BMPs will be located as close to their source as is reasonable, in accordance with MDE requirements. Site constraints, including building size, setbacks, security buffers, and utility layouts may make it necessary to locate BMPs adjacent to or within stream buffers. As stated in the EIS, this will be avoided to the extent practicable. Existing SWM Pond #3 will have to be replaced and it currently is located at the downstream end of an existing storm drain system serving the existing campus. Pond #3 is currently located adjacent to the SVB, and by necessity its relocation will need to be adjacent to or within the SVB.

Comment 4: Pages 115 - 117 of the master plan overlays SVB with the alternatives. The edge of the forest canopy will be added to these graphics in the EIS and the Master Plan.

Comment 5: Comment noted. This is a Master Plan level document. Specific locations for mitigation will be determined at the time of development

Comment 6: Comment noted. As part of the master plan process, Section 106 consultation is being undertaken with appropriate consulting parties, including Montgomery County. The process is expected to result in a new Memorandum of Agreement.

Comment 7: Comment noted

Comment 8: Section 3.12.1 of the EIS has been updated to reflect this comment.

Comment 9: Comment noted.

Comment 10: Comment noted.

Comment 11: See response to comment 1.

Comment 12: Comment noted. A connection to the White Oak Center is not a part of this Master Plan and therefore, has not been analyzed in the EIS.

Comment 13: Comment noted. 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.

Comment 14: FDA will continue coordination with the County on potential ped/bike connections.

Comment 15: 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.

Comment 16: The parking ratio was determined based upon the amount of employees that could possibly come to the FDA Campus. Currently, 10,987 employees and support staff are assigned to the FDA Campus. The current amount of parking spaces on site is 6,817. Therefore, when this is calculated (10987/6817) you end up with a 1.6 ratio.

Comment 17: Based on NCPC guidelines, a suburban facility that is not located in close proximity to a high-capacity transit stop, such as a Metrorail station, can have a parking ratio as high as 1:1.5. Results of a sensitivity analysis revealed that a lower parking ratio, approximately 1:1.8, would be more appropriate given the nature of the surrounding roadway network, resulting in an extremely aggressive NADMS goal of 46%. Given the limited implementation of the BRT (i.e. no dedicated lanes, queue jumpers) it is our opinion that the level of service would not equal that of a high-capacity Metrorail station, and thus not warrant a parking ratio of 1:2.

Comment 18: While we concur that providing additional garage parking supports a certain level of auto use and thus could result in additional traffic congestion on the study area roadway network, FDA is providing parking for only 54% of its total population. FDA will be using a robust TDM plan to acheive an NADMS goal of 46% which is extremely aggressive in a location without access to high-capacity transit service, like Metrorail. the internal circulating roadways will be adjusted to accommodate the additional vehicles onsite. Thus we don't anticipate that the location of the southeast garage would result in any additional congestion that a similar sized garage in any other location on campus.

Comment 19: A Record of Decision will be signed by the GSA NCR Regional Commissioner that will outline mitigation that GSA/FDA will be responsible for carrying out for this Master Plan. GSA/FDA will continue to work with Montgomery County to determine if a MOU is necessary.

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

Office of the Planning Director
Prince George's County Planning Department

14741 Governor Oden Bowie Drive
Upper Marlboro, Maryland 20772
www.mncppc.org/pgco

301-952-3595
(D18-030602)

March 15, 2018

Ms. Stephanie Hamlett, AICP
Chief, Planning Branch
Office of Planning and Design Quality
U.S. General Service Administration
301 7th Street, S.W.
Washington, DC 20407-0001

RE: U.S. Food and Drug Administration
Draft Master Plan and Environmental Impact Assessment

Dear Ms. Hamlett:

The Prince George's County Planning Department appreciates the opportunity to review the proposed draft Master Plan and the draft Environmental Impact Statement for the U.S. Food and Drug Administration headquarters consolidation project on the 130-acre site, located at White Oak, in Silver Spring, Maryland. As you know, this site is in Montgomery and Prince George's Counties.

To provide a more expedited review under the Mandatory Referral review process, the Montgomery County Planning Department will take the lead on the review, and the Prince George's County Planning Department will provide comments to Montgomery County. #1

Troy Leftwich, Senior Planner, Area 2 Planning Division, will be the contact for this project to coordinate staff comments from Montgomery and Prince George's Counties. Mr. Leftwich may be reached at 301-495-4553 or at troy.leftwich@montgomeryplanning.org. #2

Thank you for allowing us the opportunity to review this proposed project. If you have any questions or need additional information on the Mandatory Referral review process in Prince George's County, please contact Maria Ann Martin, Special Projects Section, Countywide Planning Division, at 301-952-3472 or via email at Maria.Martin@ppd.mncppc.org.

Sincerely,

Andree Green Checkley

Andree Green Checkley
Planning Director

c: Mary D. Gilbert Regional Commissioner, U.S. General Service Administration
Shelly Jones, Community Planner, U.S. General Service Administration
Paul Gyamfi, U.S. General Service Administration
Rodney Moulden, U.S. General Service Administration
Gwen Wright, Planning Director, Montgomery County Planning Department
Debra Borden, Principal Counsel, Legal Office, M-NCPPC
Matthew Mills, Acting Principal Counsel, Legal Office, M-NCPPC
Derick Berlage, Chief, Countywide Planning Division
Maria Ann Martin, Planning Supervisor, Special Projects Section, Countywide Planning Division
Patrick Butler, Acting Regulatory Supervisor, Area 2 Planning Division, Montgomery County Planning Department
Troy Leftwhich, Senior Planner, Area 2 Planning Division, Montgomery County Planning Department
Redis C. Floyd, Clerk of the Council, Prince George's County Council

MNCPPC March 15, 2018 Andree Checkley

Comment 1: Comment noted.

Comment 2: Comment noted.

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

Office of the Planning Director
Prince George's County Planning Department

14741 Governor Oden Bowie Drive
Upper Marlboro, Maryland 20772
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301-952-3595

April 4, 2018

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

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

Dear Mr. Leftwich:

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

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

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

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

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

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

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

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

- **Historic Preservation Conclusions** - If new construction is proposed in the eastern portion of the FDA Campus, PG:61-045, Aurora Pulsed Radiation Simulator and M:33-025, Naval Ordnance Laboratory Survey District could be impacted. Any new construction should consider visual impacts on the Naval Ordnance Laboratory Survey District (M:33-025). #3

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

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

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

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

- **Building massing and spatial pattern**- The existing FDA campus has been developed under four different master plans and established a unique site layout that features a central green open space surrounded by a series of human-scaled open courtyard spaces enclosed by midrise buildings. The open courtyards further complement the central green. Various buildings of different building techniques and finish materials from different time periods provide visual interest surrounding the open courtyards. This unique open space/courtyard pattern should be preserved in the new master plan for future expansion to maintain the integrity, continuity and strong spatial eligibility of the FDA campus #5

- **Viewshed**- The existing FDA campus is part of the historic resources of the White Oak Naval Ordnance Laboratory Historic District. The prominent features of the primary viewshed from

New Hampshire Avenue to the campus are the existing Main Administration Building and the flagpole. The development alternative that continues the building massing and clustering of the

existing campus will not only preserve the organic pattern of the FDA campus, but also preserve this historic vista from New Hampshire Avenue.

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

- **Native Species**-The Federal Government is a leader in the sustainable development. The additional buildings on the campus will achieve LEED Gold certification. The master plan also provides some general design guidelines for future landscaping on the campus. The Urban Design Section suggests that in addition to the proposed landscaping design guidelines, all landscaping materials should be native species and all herbaceous planting materials should be pollinator friendly species. #8

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

Sincerely,

Andree Green Checkley

Andree Green Checkley
Planning Director

Enclosures

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

Maryland National Capital Park & Planning Commission April 4, 2018 Andree Checkley

Comment 1: The graphics have been updated.

Comment 2: This road will be removed on future plans.

Comment 3: Comment Noted.

Comment 4: Comment Noted.

Comment 5: Comment Noted.

Comment 6: Comment Noted.

Comment 7: A Record of Decision will be signed by the GSA NCR Regional Commissioner that will outline mitigation that GSA/FDA will be responsible for carrying out for this Master Plan. GSA/FDA will continue to work with Montgomery County to determine if a MOU is necessary.

Comment 8: Comment Noted

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

Prince George's County Planning Department **(301) 952-3680**
Countywide Planning Division, Transportation Planning Section **www.mncppc.org**

March 30, 2018

MEMORANDUM

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

FROM: Tom Masog, Transportation Planning Section, Countywide Planning Division

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

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

Review Comments

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

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

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

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

Prince George's County Planning Department
Historic Preservation Section

(301) 952-3680
www.mncppc.org

April 2, 2018

MEMORANDUM

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

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

SUBJECT: **2018 FDA Federal Research Center Master Plan**

Background

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

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

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

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

Findings

Historic Preservation

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

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

Archeology

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

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

Conclusions

Historic Preservation

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

Archeology

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

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION
14741 Governor Oden Bowie Drive
Upper Marlboro, Maryland 20772
TTY: (301) 952-4366
www.mncppc.org/pgco

April 2, 2018

MEMORANDUM

TO: Maria Martin, Supervisor, Special Project Section

VIA: Susan Lareuse, Master Planner, Urban Design Section

FROM: Henry Zhang, Master Planner, Urban Design Section

SUBJECT: 2018 FDA Federal Research Center Master Plan

The Urban Design Section has reviewed the U.S. Food and Drug Administration (FDA) Federal Research Center (FRC) Master Plan. This Master Plan provides for the consolidation of the FDA headquarters campus at the Federal Research Center at White Oak to accommodate the anticipated workforce of 18,000 employees and support staff. The FRC campus covers approximately 660 acres of land (previously used as Naval Ordnance Laboratory) and is generally rectangular in shape. Its address is 10903 New Hampshire Avenue, on the east side of New Hampshire Avenue and west of Cherry Hill Road, and spans both Montgomery and Prince George's County. The 130-acre portion of FRC fronting Hampshire is developed with FDA headquarters facilities. The 2018 Master Plan proposes a number of alternatives that are adjacent to the existing FDA campus and west of both the Paint Branch and the West Branch, streams that bisect the middle of the site. The most recent improvement for the development is the roadway of FDA Boulevard, located within Montgomery County. The existing Coffman Road, located off of Cherry Hill Road within Prince George's County, is closed and will remain so in the Master Plan. There are 40 acres of the FRC in Prince George's County that is located within a broader triangular area created by the County Line, Cherry Hill Road (C-201) and Powder Mill Road (C-112). Both roadways are designated as "Collector" roadways in the County's *2009 Approved Master Plan of Transportation*. The portion of the campus in Prince George's County is surrounded by properties in the R-18 Zone with multifamily development, in the R-80, R-R Zones with single-family detached homes, and in the R-O-S Zone as open space. The *2010 Approved Subregion 1 Master Plan and Sectional Map Amendment* identified four focus areas, none of which includes the FRC campus. The proposed 2018 FDA Master Plan focuses on the existing site of the FDA campus, fronting New Hampshire Avenue. No new improvements are proposed on the 40-acre portion of the FRC, therefore the 2018 Master Plan will have little to no impact in Prince George's County,

The Urban Design Section offers the following observations relating to the Master Plan as proposed within Montgomery County. The Master Plan proposes three development alternatives, adjacent to the existing FDA campus with a combination of various of types of architecture. The general proposed

campus layout is compact development that grows organically out of the existing FDA campus. Given the size of the existing FRC campus of 660 acres, integration with the surrounding community is not occurring because the site is isolated. In addition, the Urban Design Section has suggestions regarding building massing, viewshed, on-site circulation, and planting materials.

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

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

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

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

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

Countywide Planning Division
Environmental Planning Section

14741 Governor Oden Bowie Drive
Upper Marlboro, Maryland 20772
TTY: (301) 952-4366
www.mncppc.org/pgco

April 2, 2018

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

FROM: Thomas Burke, Senior Planner, Environmental Planning Section

SUBJECT: 218 FDA Federal Research Center Master Plan and Draft Environmental Impact Statement

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

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

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

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

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

Maryland-National Capital Park & Planning Commission, April 2, 2018, Thomas Burke

Comment 1: Comment noted.

Calverton Citizens Association
P.O. Box 21
Beltsville, Maryland 20704-0021

April 15, 2018

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

RE: 2018 Draft FDA EIS and Consolidation Plan

Dear Mr. Gyamfi:

Calverton understands that organizations and companies need to consolidate to save money and to save jobs. But, let's get serious. The employees who already work at White Oak and those who will work at White Oak in future will never move to the East County area. They will not change their mode of travel to get to White Oak. So, we need to look at ways to get traffic off the local roads or to keep traffic moving more quickly.

Optimizing the signal phase length and/or increasing the signal time 150 seconds is going to be interesting. Drivers are already tired of sitting at lights for a long period of time. People need to get to work on time and not be stressed out when they get to work because the trip takes forever. Pedestrians already have a hard time crossing at intersections. The combination of the increasing the light signal and the fact that drivers will be anxious to get going when the light finally changes could be disastrous for pedestrians and bicyclists trying to cross the streets. Make sure that there are crosswalks and crosswalk signals in place on every street at all the intersections in the plan. Vehicles sitting longer at lights could also be disastrous for the environment. Gas is being wasted while sitting at the light. Vehicle exhaust pollutants are going onto the roads and will eventually end up in our rivers and the bay. Please look at this very seriously. Look at shorter lights and lights changing more frequently at intersections.

#1

Where did the report get the information in Table 3 that states that Calverton Boulevard is 4 lanes with a concrete median? Calverton Boulevard does not have 4 lanes and does not have a concrete median. It has 2 lanes (one in each direction) and 2 parking lanes (one in each direction). Montgomery County added some bump outs and one short concrete median a few years ago in hopes of slowing down drivers. Speeding is a very big problem on the street. There is a bike lane on part of Calverton Boulevard. No one wants to use it because it dangerous since it is not protected from vehicles. We have a **PROBLEM** if you are planning to widen Calverton Boulevard from 2 lanes to 4 lanes with a concrete median. That would mean you are planning to take property from the residents along Calverton Boulevard. Calverton Boulevard would no longer be a neighborhood road. Calverton Boulevard would no longer be safe for students or anyone trying to catch a bus, trying to cross the street or trying to drive in an

#2

around the community. Calverton would no long be a community where people would want to live. You would change the whole character of Calverton. **THIS IS NOT GOING TO HAPPEN. PLEASE LOOK AT AN ALTERNATIVE PLAN.**

#2 Cont.

Just an FYI. The labelling of Calverton Boulevard was mislabeled in Figure 30. Calverton Boulevard has the name Broadbirch Drive on it. But, maybe the plan is to change the name of the road. Now, we have another **PROBLEM**. Calverton Boulevard is Calverton Boulevard.

#3

Making 2 through lanes from westbound Calverton Boulevard to Broadbirch Drive is a good idea. But, traffic will really back up on Calverton Boulevard when cars and busses are in the right straight lane waiting for the light. There are a lot of vehicles that turn right onto Cherry Hill Road towards Route 29. These vehicles will find an alternative route through the Calverton community by turning onto Gracefield Road and then turning onto O'Fallon to get to Cherry Hill Road. **PLEASE ADD A SEPARATE OR DESIGNATED RIGHT TURN LANE ONTO CHERRY HILL ROAD FROM CALVERTON BOULEVARD.**

#4

Calverton Boulevard is a major cut through when traffic backs up on Route 29 or I95. It can also be a major part of an alternative route if New Hampshire is backed up at Randolph Road. Employees coming from the western part of the county and from north of White Oak will find another way to get to work. It is so easy to take Fairland Road east from Randolph Road to Galway to Calverton Boulevard. It is so easy to take Briggs Chaney Road to Fairland Road to Galway Drive to Calverton Boulevard. It is easy to take Beltsville Drive to Calverton Boulevard when Route 212, Powder Mill Road, is backed up. Calverton does not see any plan that will help keep traffic away from Calverton Boulevard. All the plans seem to encourage more traffic on Calverton Boulevard. **PLEASE DO NOT SACRIFICE CALVERTON AND THE CALVERTON COMMUNITY FOR THIS PROJECT.**

#5

Thank you for listening.

Respectfully submitted,

Bernadine (Bernie) Karns

Bernadine (Bernie) Karns
Calverton Citizens Association
P.O. Box 21
Beltsville, MD 20704-0021

Calverton Citizens Association April 15, 2018 Bernadine Karns

Comment 1: This is a master plan-level study. Intersection design does not occur during this phase. Cycle length is proposed to be reduced to 150 seconds, not increased.

Comment 2: Calverton Boulevard becomes four lanes as it approaches Beltsville Drive, which is located within the project study area. However, it does not have a concrete median. Table 3 will be revised to note that Calverton Boulevard has a striped median.

Comment 3: This is an ESRI-based map. On this map, the road between Cherry Hill Road and Tech Road is called Broadbirch Drive.

Comment 4: Comment noted. The improvements at this intersection, shown in Figure 30, include an exclusive WB right turn lane. These are proposed mitigations. The ROD will outline the specific mitigations that will be implemented.

Comment 5: All efforts are being made to reduce the potential traffic impacts of this project on all roadways within the study area by improving the major travel routes. However, Calverton should coordinate with the County to identify traffic calming measures to discourage pass-through traffic.:

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

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

Dear Mr. Gyamfi

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

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

EIS Alternative

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

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

Our main comment on alternatives deals with visual appearance. We don't support the 20 level tower height in Alternative B because it will be highly visible above the buildings closest to New Hampshire Ave. From this aspect, we prefer Alternative A. We also prefer a compact campus to minimize the distance between facilities to foster collaboration and to be close to the transit center to encourage use of public transit. To achieve those objectives, we like the office building around the conference center near New Hampshire Ave and not having the 8 level office building near the southeast parking garage, as shown in Alternatives B and C. We also would want to avoid the pedestrian bridge shown in Alternative A so people can walk between buildings without the need to go outside. Overall, Alternative C is the

#1

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

External Transportation

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

Congestion Known

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

Draft EIS Overstates Congestion

The Draft EIS assumes no transportation improvements will be made. With the implementation of the BRT, LATIP and other improvements, the no-action congestion would be much less. It is unlikely that congestion will be completely eliminated. As explained below, the implementation of transportation improvements are expected to be made before the FRC expansion can occur and therefore the draft EIS overstates the future congestion. #2

The report indicates that the no-action alternative used data provided by Sabra Wang & Associates that was prepared as part of the LATIP. We support use of that data. However, StanTec, the GSA Traffic consultant for transportation, apparently was unaware that the Sabra Wang traffic data already included 1,483.936 square foot of additional bioscience development on the FRC. Thus the no-action alternative congestion predictions are essentially the action alternative predictions. The no-action alternative prediction would be lower, but the area would still be congested if the WOSG MP development occurred but the implementation of the improvements didn't occur. Nevertheless, the Draft EIS recommended approach to coordinate with Montgomery County and SHA is still valid. The detailed EIS solutions might change, but the LATIP solutions are not final anyway. #3

The traffic data provided by Sabra Wang probably over states the projected vehicle traffic volume. The data was developed by the Montgomery County Planning Department. They had to split the trips between vehicle, transit, walking and bicycling. The Planning Department didn't have data about how the local bus routes would be changed and expanded as part of the Bus Rapid Transit (BRT) projects and just used existing local routes. Thus the number of transit trips is surely understated and vehicle trip overstated. #4

At this time, reliable transit data is not available. Montgomery County Department of Transportation presented initial concepts for changing the local bus routes related to the US29 BRT at a meeting on February 26, 2018. Actual local bus route changes related to the US29 BRT will not be firmly known until 2019. Once BRT becomes operational on New Hampshire Ave and Randolph Road, the number of vehicle trips will be further reduced. Even if the routes were known, there is no agreement on how #5

#5 Cont.

#6

many trips would shift from vehicle to transit. The design of LATIP solutions will need to take that into account as they are developed and implemented over the next decade.

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

Montgomery County Processes to Avoid Congestion Getting Worse

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

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

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

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

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

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

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

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

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

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

External Integration with the FRC

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

#7

BRT on Industrial Pkwy near FDA Blvd. As indicated above, the Randolph Road BRT would include a platform in the area of the Industrial Parkway Extended/FDA Blvd Intersection. FDA should provide shuttles to that platform. #8

Shuttles. GSA/FDA should provide shutters to the White Oak BRT platform on Lockwood Dr when the US29 corridor opens in 2020 as recommended in the Draft EIS. Since a number of FDA doctors are expected to practice medicine at the White Oak Medical Center, we recommend that FDA also provide a shuttle to it, which opens in mid-2019. Once the Randolph Road BRT corridor is built, we expect there will be a BRT platform at the hospital. Once GLDC extends Industrial Parkway, we recommend the hospital/BRT shuttle also stop at the Tech Road platform (on the US29 BRT). It is expected that over time, a number of FDA employees will live in Viva White Oak and that a number of companies that FDA regulates will have offices in Viva White Oak and travel from there to FDA from time to time for meetings. The hospital/Viva White Oak shuttle should provide service to the three BRT platforms (Tech Road, Viva White Oak and Hospital). These shuttles will reduce the number of vehicles driving onto the FRC and thus reduce the need for parking spaces. #9

Bikeways. The LATIP includes a number of bikeways in the area, especially within Viva White Oak and existing commercial area between it and US29. We encourage GSA to provide bikeways and secure bicycle parking on the FRC as recommended in the Draft EIS (Main EIS page 174 and Appendix G, Part 3, Page 6) #10

In summary:

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

Sincerely

Daniel L. Wilhelm, President GCCA

Attachment 1.

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

#11

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

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

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

Greater Colesville Citizens Association March 22, 2018 Daniel Wilhelm

Comment 1: All proposed improvements in the LATIP and the BRT were accounted for in the No-Action Alternative.

Comment 2: The Sabra Wang traffic study into consideration during our analysis. This was part of the No-Action scenario.

Comment 3: See response to Comment 2.

Comment 4: We agree that the analysis was based upon the available information at the time of the study.

Comment 5: Road classifications were obtained from the Maryland Department of Transportation State Highway Administration.

Comment 6: Yes. A phasing plan is provided in the Master Plan.

Comment 7: An expanded shuttle program is discussed in the TMP.

Comment 8: A phasing plan is included in the Master Plan. An expanded shuttle program is discussed in Section 5.2.4 of the TMP.

Comment 9: Comment noted.

Comment 10: Road classifications were obtained from the Maryland Department of Transportation State Highway Administration.

Comment 11: The posted speeds shown in Table 18 have been corrected for all four roadways. In the case of Fairland Road, and Randolph/Cherry Hill Road, the table has been updated to indicate variable speeds on the corridor. However, while speed does relate to capacity, the relationship is not linear. Capacity of a roadway segment is primarily based on the number of available lanes and lane widths/roadway geometry, and at an intersection, capacity is also heavily dependent on the amount of green time provided to a particular movement. These relatively minor speed adjustments recommended in this comment for four roadways would not result in less congestion shown in the models, and would not affect the report's findings.

From: Paul Gyamfi - WPDBA
To: Estes, Liz; Davis, Jessica; Shelly Jones - WPDBA
Subject: Fwd: Comments on Draft EIS on 2018 Federal Research Center Master Plan
Date: Tuesday, April 17, 2018 9:20:22 AM

FDA EIS Comment from local resident

Paul Gyamfi
Senior NEPA Compliance Specialist
General Services Administration
National Capital Region
Public Buildings Services
Office of Planning and Design Quality
301 7th Street, SW
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Washington, DC 20407
Desk Tel: (202) 690 9252
Cell: (202) 440 3405

---------- Forwarded message ----------
From: **WPCA** <wpcatraffic@yahoo.com>
Date: Mon, Apr 16, 2018 at 11:58 PM
Subject: Comments on Draft EIS on 2018 Federal Research Center Master Plan
To: Paul Gyamfi - WPDBA <paul.gyamfi@gsa.gov>
Cc: WPCA Comm <wpcatraffic@yahoo.com>

Dear Mr. Gyamfi,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement on the 2018 Federal Research Center Master Plan.

We are concerned that this data was not available to Montgomery County during their recent comprehensive study of transportation for the area and the fact that the FDA expansion was not considered during the White Oak Science Gateway Master Plan process. #1

We do appreciate FDA's presence in our community and thank you for the comprehensive reports in the Draft EIS. We are still reviewing some of the reports. #2

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. #3

We would also like GSA to consider opening a public road as an outlet from the VIVA #4

White Oak project to either Lockwood Drive or New Hampshire Avenue.

Sincerely,
Harriet Quinn, Vice-President
Woodmoor-Pinecrest Citizens Association
Silver Spring, Maryland 20901

Woodmoor-Pinecrest Citizens Association: April 16, 2018 Harriet Quinn

Comment 1: The current FDA expansion was not considered in the WOSG Master Plan. The WOSG Master Plan was completed in July 2014. Congress did not pass the FDA Reauthorization Act until 2017. 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.

Comment 2: Comment noted.

Comment 3: Comment noted. Transportation Impacts are discussed in Section 3.13 and Appendix G of the EIS. Impacts related to utilities can be found in section 3.14 of the EIS.

Comment 4: The FDA site is a secure campus. Providing public access between VIVA White Oak and New Hampshire Avenue would not be possible through the FRC. Furthermore, additional coordination would be required with the Department of Defense regarding security near/through their portion of the site.

GLOBAL LIFESCI DEVELOPMENT CORPORATION
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April 16, 2018

VIA Electronic Transmission (Paul.Gyamfi@GSA.gov)

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

Re: FDA Headquarters Consolidation – Comments to March 22, 2018 Presentation

Dear Mr. Gyamfi:

Thank you for inviting public comment to the GSA's March 22, 2018 EIS Presentation, which was held at the CHI Centers on New Hampshire Avenue in White Oak, relating to the proposed updated master plan process for the continuing consolidation of the FDA Headquarters in White Oak. I attended that March 22, 2018 EIS presentation, and wish to comment on three topics that I believe were not appropriately or fully considered or evaluated in the GSA's March 22, 2018 EIS presentation.

My comments to the GSA's March 22, 2018 EIS presentation fall into the following three categories:

1. **The GSA appears to have OVERSTATED the "BUILD" scenarios' TRANSPORTATION IMPACT in comparison the GSA's "NO-build" scenario**. #1

   The State of Maryland, Montgomery County, and the local private sector have planned (and are funding) substantial transportation capacity infrastructure beyond the existing conditions. In connection with the recent White Oak Science Gateway ("WOSG") Master Plan, which was approved by the Montgomery County Council in July of 2014, there are now ~$900 Million of transportation infrastructure improvements planned during the build-out of the WOSG Master Plan properties (which surround the FDA Headquarters in White Oak). Among the first phase of

transportation mobility investments being funded by Montgomery County and the State of Maryland (including the use of a US DOT TIGR grant) is a north-south rapid transit corridor along US Route 29 (from Howard County line to the Silver Spring Metro Station), which is expected to operational by the year 2021. Among the other nearly $900 Million of transportation infrastructure planned to serve the WOSG Master Plan area (and funded by the State of Maryland, Montgomery County, and the private sector property owners within the WOSG Master Plan area) is another north-south rapid transit corridor along New Hampshire Avenue (which will serve the front entrance to the FDA Headquarters in White Oak), a separate east-west rapid transit corridor along Randolph Road and Cherry Hill Road (which will serve FDA Boulevard and the Northwest Entrance Gates to the FDA Headquarters in White Oak), and numerous other regional transit, bicycle, micro-transit options and other modes of mobility (all of which will be of service to future personnel and visitors to the FDA Headquarters in White Oak).

#1 Cont.

Under the GSA's proposed "Build" scenarios on the Federal Research Center ("FRC") property in White Oak, the GSA did not appear to factor adequately these substantial planned and funded transportation infrastructure improvements being made and funded by the State, County, and local private sector developers. Conversely, under the GSA's "NO Build" scenario, the FDA would not be taking any added advantage of all these transportation infrastructure improvements in the area. Accordingly, in comparing the potential scenarios, the GSA significantly **overstated** the "Build" scenarios' transportation impacts.

2. **The GSA appears to have UNDERSTATED the "NO-BUILD" scenario's ENVIRONMENTAL DETRIMENT compared to the GSA's "Build" scenarios**.

#2

The GSA's suggested "NO-Build" analysis would be accurate ONLY if the FDA did not expand anywhere. If, however, the FDA did expand anywhere --- whether or not at the FRC property in White Oak --- then there would be environmental impacts wherever the FDA expanded. It would only be a matter of degree from a "micro-analysis" (meaning, an analysis within a very small geographic area around the FDA property) and from a "macro-analysis" (meaning, a larger regional geographic analysis).

In fact, in the near term (of 10 years or less) the FDA must expand its Headquarters operations (by as many as 9,000 or more personnel) in order for the FDA to fulfill its public health mission mandated by Congress. For the reasons noted above, therefore, the comparison of "NO-Build" versus the "Build" scenarios must

consider BOTH the "micro-analysis" AND the "macro-analysis" impacts, in order for there to be an appropriate "apples-to-apples" comparison. Accordingly, if the FDA expansion did not take place on the FRC property in White Oak (i.e., under the GSA's "NO-build" scenario), those ~9,000 more FDA personnel would have to be located a greater distance away from the FDA Headquarters at the FRC; and thus the "NO-build" scenario would result in greater vehicles miles traveled to and from the FDA Headquarters at the FRC by those added ~9,000 FDA personnel located off-site (which increases the use of the regional transportation capacity and increases the production of greenhouse gas emissions, among other environmental detriments associated with the "NO-build" scenario).

#2 Cont.

Yes, any such "macro-analysis" (of the regional impacts under the GSA's "NO-build" scenario) would naturally contain some degree of "speculation" (i.e., speculation about where the alternative location would be and how large a complex it would be. But that level of "speculation" is only in an absolute sense with respect to how large the environmental detriments would be under the GSA's "NO-Build" (at the FRC) scenario. Nevertheless, in a relative sense, the detrimental nature of the "NO-Build" scenario is **not** speculation. It is only a matter of degree as to how much detriment the "NO-Build" scenario might be. It is indisputable that there would be added vehicles miles traveled and added production of greenhouse gases (as well as other adverse environmental impacts) if the ~9,000 added FDA personnel were located (for example) 5 miles away, 10 miles away, or 15 or more miles away from the consolidated FDA Headquarters at the FRC. It would only be a matter of degree relative to the various "Build" options at the FRC or within the White Oak area.

For these reasons, the GSA appears to have significantly **understated** the "NO-Build" scenario's environmental impacts (particularly when evaluating the appropriate relative "macro-analysis") in the GSA's March 22, 2018 EIS presentation.

3. **The GSA appears to have UNDERSTATED the "NO-BUILD" scenario's FINANCIAL DETRIMENT to federal taxpayers compared to the GSA's "Build" scenario**.

#3

The "NO-Build" scenario on the FRC site would: (a) result in extremely costly duplication of the >$1.3 Billion dollars already invested in specialized laboratory, secured offices, secured communications infrastructure, and other national security matters located at the consolidated FDA Headquarters on the FRC in White Oak, and (b) fail to achieve the clear mandate of Congress to consolidate the FDA Headquarters operation in White Oak to create greater efficiencies of FDA health

innovations, as well as the speed of FDA's decision-making regarding the safety and efficacy of medical devices, drugs, vaccines, and other health initiatives; all of which consolidation at White Oak would be most cost-effective for the federal taxpayers. Specifically, in 1996, **Congress noted that it "strongly supports the consolidation of FDA facilities at White Oak, Maryland, as proposed by the FDA in consultation with the GSA" (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).**

It thus appears that the GSA's "NO-build' scenario **understated** the financial detriment to the taxpayers (and to the healthcare consumers) if the FDA personnel were not consolidated at the FRC or in White Oak, Maryland.

#3
Cont.

Thank you, again, for affording the public the opportunity to comment on the GSA's March 22, 2018 EIS presentation relating to the FDA Headquarters consolidation at the FRC.

If you have any questions, or wish to have any additional information, please feel free to contact me at any time.

Respectfully Submitted,

Jonathan M. Genn

gldc-gda-comment letter to march 22 2018 eis-final-2018-0416b.docx

Global Lifesci Development Corporation, April 16, 2018 Jonathan Genn

Comment 1: The TTR does in fact consider the impact of these improvements in that it assumes that 46% of all trips will be conducted via modes other than driving alone. This is an extremely aggressive goal that will require substantial investment and coordination even beyond the BRT system to achieve. Furthermore, given the limited implementation of the BRT (i.e. no dedicated lanes, queue jumpers) as well as the location of the majority of FDA employees, it is our opinion that assuming a more aggressive goal is not warranted at this time.

Comment 2: Identifying where federal employees would go is procurement sensitive and is not analyzed in this document. This Master Plan and EIS looked at expanding the FDA Campus at White Oak. Therefore, the no-action was based upon the existing land use present on the FDA Campus. NEPA requires GSA to consider the no-action alternative because it provides a baseline for evaluating the environmental impacts of the Master Plan alternatives. As stated in Section 2.2.2 of the Draft EIS, "The additional employees needed to conduct the complex and comprehensive reviews mandated by Congress would need to be located in other government-owned or leased space in the Washington, DC metropolitan area." If leases in other spaces are needed, GSA will conduct a separate NEPA analysis on the leased action.

Comment 3: Comment Noted - This is outside of the scope of the EIS.

,

From: Paul Gyamfi - WPDBA
To: Estes, Liz; Davis, Jessica; Shelly Jones - WPDBA
Subject: Fwd: Testimony on White Oak Draft EIS
Date: Tuesday, April 10, 2018 10:30:38 AM
Attachments: GSA EIS Comments.docx

FDA DEIS Comment

Paul Gyamfi
Senior NEPA Compliance Specialist
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---------- Forwarded message ----------
From: **Dan Wilhelm** <djwilhelm@verizon.net>
Date: Fri, Mar 23, 2018 at 8:36 AM
Subject: Testimony on White Oak Draft EIS
To: Paul Gyamfi - WPDBA <paul.gyamfi@gsa.gov>

Attached is an electronic copy of the testimony I provided last night in printed form.

I also want to comment on the various other environmental assessments presented last night. That assessment was based upon a micro level view, meaning the White Oak FRC. If an macro view were taken, locating FDA at White Oak would have turned unfavorable results into favorable results in most cases. The macro view would assume that the FDA and other employees would need to be located somewhere in the metro area and the impacts assessed on the overall area. #1

Dan Wilhelm

Email from Dan Wilheim

Comment 1: Identifying where federal employees would go is procurement sensitive and is not analyzed in this document. This Master Plan and EIS looked at expanding the FDA Campus at White Oak. Therefore, the no-action was based upon the existing land use present on the FDA Campus. NEPA requires GSA to consider the no-action alternative because it provides a baseline for evaluating the environmental impacts of the Master Plan alternatives. As stated in Section 2.2.2 of the Draft EIS, "The additional employees needed to conduct the complex and comprehensive reviews mandated by Congress would need to be located in other government-owned or leased space in the Washington, DC metropolitan area." If leases in other spaces are needed, GSA will conduct a separate NEPA analysis on the leased action.

Comments on February 2018 Draft Environmental Impact Statement for the 2018 Federal Research Center Master Plan

Submitted by:
Bernard H. Berne
4316 N. Carlin Springs Road, #26
Arlington, VA 22203-2035

The Draft Environmental Impact Statement (DEIS) for the 2018 Federal Research Center (FRC) Master Plan has a number of major defects. The most important of these is the failure to consider or evaluate at least one alternative location for the FDA headquarters office space expansion that appears to have a smaller adverse environmental impact that do any of the three "build" alternatives that the DEIS evaluates.

Each of the three "build" alternatives would locate a cluster of large FDA office buildings at or near the east end and/or the southeast corner of the existing FDA campus. These locations are long distances away from New Hampshire Avenue, on which a number of Metrobus and Ride-On Bus routes travel. These new buildings would therefore be far from existing public transit routes that presently serve the White Oak area.

As shown in Figures 4, 5 and 6 on pages 29, 31 and 33 of the DEIS, all three "build" alternatives would locate a transit center near the northwest corner of the FDA campus. The transit center would therefore be a long distance (at least one-quarter of a mile) from some or all of the new buildings at or near the east end of the campus.

People would waste a large amount of time (including federal time) when walking between the transit center and the new buildings or when waiting for intra-campus shuttle buses. The excessive times required to travel between the new buildings and the transit center would discourage the use of public transit when commuting to and from the campus.

Very few people would use public transit to commute to and from work in the new buildings. Motor vehicle use would increase, adding to the area's traffic congestion, air pollution and energy consumption.

The DEIS does not discuss or evaluate any of the adverse environmental impacts that would result from the distance between the transit center and the new buildings on the east side of the FDA campus. Further, the DEIS does not describe or evaluate any alternative locations for the transit center that might place it within an area that is more central to the FDA campus than is the campus' northwest corner. **This is a major deficiency of the DEIS**. #1

In addition, the new buildings on the east side of the campus would be a long distance from Building 2, the present campus' Shared Services building. Building 2 holds a number of conference rooms and other shared-use facilities, including the main FDA library, the FDA health center and the FDA computer support center. #2

The long distances and times needed to travel between the new buildings and Building 2 would

create many inefficiencies. This inefficient distribution of FDA buildings would waste much government time and money.

Section 2.3 on pages 35 to 36 of the DEIS is entitled "What Other Alternatives did GSA Consider, but Not Study in Detail?" Section 2.3 briefly describes and rejects two such alternatives ("Development in the Center of the FRC" and "Development in the Eastern Portion of the FRC"). #3

However, Section 2.3 does not describe or evaluate the alternative of constructing new FDA office buildings in the western portion of the FRC. This portion of the FRC is between New Hampshire Avenue and the existing office buildings and parking lots on the west side of the FDA campus. This portion of the FRC is west of Northwest Loop Road and Southwest Loop Road. The area, which formerly held a golf course, is presently undeveloped and underutilized.

Figure 7 (Project Study Area) on page 53 of the DEIS shows that much of the western portion of the FRC is outside of the project study area. The DEIS does not justify the exclusion of this area from the project study area. **The EIS needs to provide this justification.** #4

The failure of the DEIS to evaluate or discuss the potential construction of new FDA office buildings in the western portion of the FRC is a major deficiency of the DEIS. **Indeed, the failure to evaluate this alternative in the DEIS appears to violate the National Environmental Policy Act of 1969 (NEPA), which the DEIS describes on page 12 in Section 1.6.1. The EIS needs to evaluate this alternative.** #5

The placement of new FDA office buildings in the western portion of the FRC would have a smaller adverse environmental impact than would any of the three "build" alternatives that the DEIS evaluates. As stated above, a number of Metrobus and Montgomery County Ride-On bus routes travel along New Hampshire Avenue.

The northern part of the western portion of the FRC, which is north of Mahan Road, is close to an existing transit center a short distance west of the intersection of New Hampshire Avenue and Lockwood Drive. A substantial number of Metrobus and Ride-On bus routes converge at this intersection.

The DEIS does not describe this existing transit center (see Section 3.13, beginning on p. 167). **This is a deficiency in the DEIS that requires correction.** #6

Because of the area's proximity to New Hampshire Avenue and the existing transit center, an expansion of the FDA campus into the western portion of the FRC would increase the use of public transit for people commuting to and visiting the FDA headquarters. This is in marked contrast to the decrease in use of public transit that would result from each of the three "build" alternatives. Such an expansion would result in less area traffic congestion, air pollution and energy consumption than would any of the three "build" alternatives.

In addition, the increased access to public transit associated with development of the western portion of the FRC would increase FDA's recruitment and retention. Many people prefer to use

public transportation when commuting where such commuting is convenient.

Further, much of the western portion of the FRC is close to the shared services in Building 2. The part of the western portion that is north of Mahan Drive is also close to the existing transit center near the intersection of Lockwood Drive and New Hampshire Avenue and to the location of the proposed new FDA transit center in the northwest corner of the FDA campus that the DEIS illustrates in Figures 4, 5 or 6.

The DEIS does not provide any justification for the failure of GSA to evaluate the western portion for the FRC as a potential site for the construction of new FDA office buildings. However, statements in the DEIS suggest that issues relating to cultural resources and water resources in the western portion of the FRC contributed to this failure. I am therefore discussing these below.

Cultural Resources:

Page 145 of the DEIS states in Section 3.12.2.1 (Cultural Resources: Historic Structures and Landscapes: Are there any historic structures or landscapes at the FRC?):

"*The NOL was determined eligible for the National Register of Historic Places in 1997 as part of the planning process for the transfer of the site from the Department of Defense to the GSA. Beginning in 2001, 130 acres of the FRC were redeveloped for the U.S. Food and Drug Administration (FDA).*" A box in the upper left corner of page 146 in the DEIS states that the former NOL/NSWC is now the "U.S. NOL Historic District".

The second paragraph in page 146 of the DEIS states:

"*When the NSL/NSWC was determined eligible for the National Register of Historic Places in 1997, there were 372 documented historic resources on the site, which included 290 contributing resources and 112 non-contributing resources. .... Under the 2003 Memorandum of Agreement, a number of historic resources within the boundaries of the FDA campus (100 area) were documented and removed during the development of that facility. Historic resources retained in the area include Buildings 100 and the flagpole. Additionally, following completion of the 2003 Memorandum of Agreement, nearly all the resources in the 300 and 600 Areas were removed*".

Appendix F (Listing of Historic Resources within the Naval Ordinance Laboratory) in the DEIS states in the section entitled "Area 100: Administration":

"*Four contributing historic resources remain: Building 1 and 100 (the fire house, the flagpole, and the historic golf course. The remaining buildings were documented and removed according to the terms of the MOAs.*":

The National Park Service's National Register Bulletin contains a number of pages that have the heading: "How to Apply the National Register Criteria for Evaluation". Section VIII (How to Evaluate the Integrity of a Property at www.nps.gov/nr/publications/bulletins/nrb15/nrb15_8.htm#seven aspects describes seven

#7

aspects of integrity. Two of these aspects are feeling and association, as follows:

#7
Cont.

Feeling

Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. *It results from the presence of physical features that, taken together, convey the property's historic character. For example, a rural historic district retaining original design, materials, workmanship, and setting will relate the feeling of agricultural life in the 19th century. A grouping of prehistoric petroglyphs, unmarred by graffiti and intrusions and located on its original isolated bluff, can evoke a sense of tribal spiritual life.*

Association

Association is the direct link between an important historic event or person and a historic property. *A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character. For example, a Revolutionary War battlefield whose natural and manmade elements have remained intact since the 18th century will retain its quality of association with the battle.*

To help determine whether a historic district has retained the feeling and association, the page contains the following information under the heading "DEFINING THE ESSENTIAL PHYSICAL FEATURES":

Historic Districts

For a district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished. ***In addition, the relationships among the district's components must be substantially unchanged since the period of significance.***

When evaluating the impact of intrusions upon the district's integrity, take into consideration the relative number, size, scale, design, and location of the components that do not contribute to the significance. A ***district is not eligible if it contains so many alterations or new intrusions that it no longer conveys the sense of a historic environment.***

A component of a district cannot contribute to the significance if:

- ***it has been substantially altered since the period of the district's significance*** *or*
- *it does not share the historic associations of the district.*

As stated in Appendix F of the DEIS, GSA has removed a number of the historic buildings in Area 100 (Administration). Building 1, the fire house (Building 100) and a flag pole are the only structures that remain in place.

Further, GSA has constructed a number of large FDA headquarters buildings in and adjacent to Area 100. In addition, the historic golf course no longer exists. GSA has significantly altered the appearance of the former golf course's area by:

- planting a large number of trees near a stream that ran from north to south through the center of the golf course.
- relocating a major road (Michelson Road) and its intersection with New Hampshire Avenue in the golf course area, and,
- constructing a stormwater retention pond in or near the northwest corner of the golf course's area.

As a result, the area between New Hampshire Avenue and the FDA headquarter buildings no longer resembles the historic golf course that existed in 1997.

The alterations and new intrusions in Area 100 (including those within and adjacent to the former golf course) have apparently changed that area to the extent that it no longer conveys the sense of a historic environment. Building 1 and the flagpole retain their historic appearance. However, they no longer exist within a context that resembles that of the former NOL.

#8

Although the area that contained the NOL that was east of the FDA headquarters has apparently retained its integrity (with the exception of Areas 300 and 600), the entire area between the eastern end of the headquarters and New Hampshire Avenue (at the western end of the NOL has apparently lost its integrity.

#9

The administrative area of the NOL (Area 100) was a critical component of the NOL. The NOL Historic District therefore appears to "***contain so many alterations and new intrusions that it no longer conveys the sense of a historic environment.***"

As a result, the NOL Historic District no longer appears to be eligible for listing on the National Register of Historic Places. At a minimum, everything in Area 100 (including the administrative area and the former golf course) and in Areas 300 and 600 need to be removed from the list of resources that contribute to NOL Historic District.

#10

Building 1 and the flagpole remain as historic resources eligible for either separate listings on the National Register of Historic Places or as a unit. However, the two structures no longer appear to be contributing resources to the NOL Historic District (if the remainder of the District has indeed retained sufficient integrity to remain eligible for listing on the National Register as an entity).

#11

The box in the upper left corner of page 146 of the DEIS states:

HISTORIC GREEN BUFFER ZONE

Per the December 5, 2000, Memorandum of Agreement (MOA) the historic green buffer is

determined to be a contributing element within the historic district (See Appendix E). The green buffer zone is the planted buffer (1,200 feet in depth from the center line of New Hampshire Avenue to the front of the closed building from the U.S. NOL Historic District), established in 1945 to protect the Naval Ordinance Laboratory from electronic and other incursion, and to protect the surrounding residential area from what was considered and industrial facility.

The former golf course was within this "Historic Green Buffer Zone." The second paragraph on page 146 states that, "*according to the determination of eligibility, the golf course provided a "physical and natural buffer which preserves the visual character of the main complex".* #12

Page 156 of the DEIS states: "*The 1997 determination of eligibility and 2002 MOA cited the historic buffer and the views from New Hampshire Avenue to the facade of Building 1 as important campus features, ...*" #13

It is important to recognize that this "Historic Green Buffer Zone", which contained a golf course in 1997, 2000 and 2002, no longer serves its historic purpose. The FDA headquarters presently contains adequate security facilities (security guard stations, bollards near buildings, etc.) The FDA headquarters does not require any further protection from electronic and other incursions. #14

The FDA headquarters therefore does not need a buffer zone that is as wide as 1,200 feet from the center of New Hampshire Avenue. Further, the "Historic Green Buffer Zone" no longer serves to "protect the surrounding residential area from what was considered an industrial facility", because the FDA headquarters is not an industrial facility and not resemble one.

As I have stated above, GSA has since 2000 removed all of the historic buildings that existed in the NOL within that were within Area 1, except for Building 1 and the the Fire House (Building 100). GSA has also constructed new FDA buildings within Area 1 and has significantly altered the appearance of the former golf course. Therefore, the "historic green buffer zone" does not contribute to the integrity of the NOL Historic District, except perhaps in the area surrounding Mahan Road that lies between New Hampshire Avenue and the facade of Building 1. #15

The remainder of the "Historic Green Buffer Zone" is no longer historically significant. The remainder of this "buffer zone" is no longer a contributing resource to the Historic District's eligibility for listing on the National Register of Historic Places. #16

In summary, recent demolition of historically significant buildings and the recent construction of new FDA buildings have apparently destroyed the integrity of the "NOL Historic District". As a result, the "NOL Historic District" appears to be no longer eligible for inclusion in the National Register of Historic Places, especially in the area within and adjacent to Area 1, which presently contains the new consolidated FDA Headquarters. As a result, the "Historic Green Buffer Zone" is no longer a contributing resource to the Historic District and lacks historic significance.

The DEIS states on page 154 that GSA intends to close out the existing 2002 Memorandum of Agreement (MOA) for the FRC as part of GSA's plans for the expansion of the FDA. The DEIS further states on page 154 that GSA has initiated consultation with potential consulting parties under Section 106 of the National Historic Preservation Act (NHPA), which is being conducted

in conjunction with the EIS. The draft EIS additionally states that GSA intends to negotiate a new MOA to govern work carried out under the new master plan.

Because the "NOL Historic District" has lost much of its integrity, the EIS needs to state that the the process leading to the development of a new MOA will consider whether the "NOL Historic District" or any of its contributing resources are presently eligible for inclusion in the National Register of Historic Places. GSA needs to suspend action on this EIS until such time as GSA and the Maryland State Historic Preservation Officer (SHPO) determine which parts (if any) of the former NOL/NSWC are presently eligible for inclusion in the National Register, either as a whole or as contributing resources. #17

As the "Historic Green Buffer Zone" (including the former golf course) is no longer historically significant, there appears to be nothing related to "Cultural Resources" (DEIS Section 3.12) that prevents the construction within the western portion of the FRC of some or all of the new buildings that the three "build" alternatives presently propose to construct on the east end and/or southeast corner of the present FDA headquarters campus.

Water Resources

Figure 17 (Existing Waterways, Wetlands, and Stormwater Management Facilities) and Figure 18 (Existing Stormwater Management Practices) on pages 77 and 81 of the DEIS show that a small stream runs from north to south within the western portion of the NRC.

Section 3.3.2 (Water Resources: Surface Water and Wetlands" states in the second paragraph on page 76 of the DEIS that the State of Maryland has designated this stream (a tributary of Paint Branch upstream of the Capital Beltway) as a Use III (Nontidal Cold Water) waterway. The paragraph further states that the 2000 Guidelines for Environmental Management of Development in Montgomery County state that Use III streams require a 150-foot minimum buffer. No buildings, structures, impervious surfaces, or activities requiring clearing or grading are permitted within stream valley buffers, except for unavoidable road, trail or utility crossings.

Figures 17 and 18 illustrate in green the 150-foot wide stream valley buffer that surrounds the stream in the western portion of the NRC. These figures also illustrate the dimensions of the buildings that presently exist within the FDA campus.

Figures 6 and 7 show that many existing FDA buildings are less wide than is the area between the stream valley buffer and New Hampshire Avenue. This is especially evident in the area of the western portion of the NRC that exists south of Mahan Drive. However, it is also evident to a lesser extent in the area north of Mahan Drive.

Further, the area within the western portion of the NRC north of Mahan Drive that is between the stream valley buffer and Northwest Loop Road has sufficient width to contain a number of new FDA office buildings that are at least as wide as those that presently exist on the FDA campus. The northern two-thirds of this area is forested; the southern third of the area is grassy with occasional trees and a small one-level building. #18

Section 3.4.2 (How Would the Vegetation Be Affected By The Project) on pages 103-105 of the DEIS states on page 104-105 that Alternatives A, B and C would permanently remove 7.3 to 7.9 acres of forest. Table 14 on page 103 shows that the total forest impacts of the three alternatives range from 7.7 acres in Alternative C to 10.3 acres in Alternative A. Fragmentation of forest areas would further affect the forested area east and southeast of the present FDA campus.

It appears that the adverse environmental impacts resulting from removal of the forest existing between the Northwest Loop Road and the stream valley buffer in the western portion of the NRC would not exceed those impacts that Alternatives A, B and C would create. The acreage of forests that each of these Alternatives would remove (as illustrated in Figures 22, 23 and 24) appears to be similar to the acreage of forest that development of the western portion of the NRC would remove (as illustrated in Figure 17). #19

Alternative B proposes the construction of a 20-level building at the eastern end of the FDA campus. One or more buildings of similar heights can be constructed in the western portion of the NRC outside of the stream valley buffer. In this regard, it is important to note "The Enclave", a residential building complex located a short distance northwest of the intersection of Lockwood Drive and New Hampshire Avenue contains several buildings that have approximately 18 above-ground levels. #20

New buildings of similar heights constructed in the western portion of the NRC that are near New Hampshire Avenue would therefore be consistent with nearby buildings that already exist in the surrounding community. Further, if the new buildings are high enough, they may be capable of housing all of the offices that FDA needs to complete its expansion.

This would place all of the new buildings near existing bus routes and Building 2. The resultant campus would be far more efficient and transit-oriented than would Alternatives A, B or C.

Figures 22-24 show that Alternatives A, B and C would require the removal of portions of a stream valley buffer that surrounds a stream north of the area containing new buildings. (Construction of a new road would require this removal, which is contrary to the Montgomery County's guidelines cited above.) The figures show that the associated adverse impacts of this removal would be mitigated by the relocation of stormwater pond #3 and construction of a new walled or underground stormwater management facility. GSA can construct similar stormwater management facilities in the northern portion of the FRC to mitigate any adverse impacts to the buffer surrounding the stream that travels through that area that new buildings and roads might cause. #21

GSA should also consider redirecting the stream in the western portion of the FRC to enable it to travel near New Hampshire Avenue. This would increase buildable space and would permit a new stream valley buffer to act serve as a security buffer separating New Hampshire Avenue from the new FDA buildings in the western portion of the FRC. #22

Heights of Office Buildings near Northwest Loop Road in Alternatives B and C.

Figures 5 and 6 propose the construction of a 6-level office building a short distance west of #23

Northwest Loop Road. This is an inefficient use of buildable space. This building, which could contain the new conference center should be at least 20 levels in height. This would permit many offices to be near the new transit center and Building 2. The area that would contain this building is no longer eligible for inclusion in the National Register of Historic Places because of its lack of integrity. As a result, a 20 level building would not adversely impact any historic resources.

#23 Cont.

Inconsistency with Federal Planning Executive Orders and Planning Policies:

Section 3.8.1 (page 115) describes various federal planning policies relevant to this project. However, the section fails to state that the project contradicts the Federal Workplace Element of the Comprehensive Plan for the National Capital. That element recommends restoration of the historic percentages of federal facilities between the District of Columbia and its suburbs, including Montgomery County. The element advocates an increase in the percentage of federal employment within D.C. and a decrease in the suburbs. This DEIS proposes a project that is inconsistent with this goal.

#24

Executive Order 12072 requires that federal use of space in urban areas serve to strengthen the nation's cities and make them attractive places to live and work. The Order requires such federal facilities to be located in centralized business areas and adjacent similar areas in central cities. Construction of federal buildings at White Oak violates this Executive Order, which is still in effect.

#25

GSA needs to revise Section 3.8.1 to provide the above information.

Bernard Berne, 4316 N. Carlin Springs Road #26, Arlington, VA, 2018

Comment 1: The transit center is proposed where it can be easily accessible by the transit services (i.e., Montgomery County Ride-On, Metrobus, MTA Commuter Bus) and where these services can access it outside of the secured campus. In addition, FDA provides a robust shuttle service that serves local Metro stations. Four internal circulator routes are also provided to link the buildings and parking lots on the White Oak Campus. These shuttles would continue under the new Master Plan. This is analyzed in Section 3.13 of the EIS. GSA/FDA are also in the process of enhancing site circulation. This would include road realignment to facilitate two-way traffic for FDA shuttles and EMS services. This is discussed in Section 3.16 of the EIS.

Comment 2: Comment noted.

Comment 3: Chapter 2 of the Draft EIS discusses the alternatives considered in the EIS and those that were dismissed. The land immediately adjacent to New Hampshire Avenue and Building One has always been considered a buffer and is now documented as a historic buffer. In addition there is a stream valley buffer that consumes a vast percentage of the area and much of the that area was reforested as part of the mitigation for the new bridge across Paint Branch Creek.

Comment 4: Figure 10 depicts the area that was considered in this EIS for development. The land immediately adjacent to New Hampshire Avenue and Building One has always been considered a buffer and is now documented as a historic buffer. In addition there is a stream valley buffer that consumes a vast percentage of the area and much of the that area was reforested as part of the mitigation for the new bridge across Paint Branch Creek.

Comment 5: Section 1.4 of the EIS discusses the goals and objectives of this Master Plan. One goal is to reinforce FDA's image as a leading scientific institution, foster retention and create attraction by creating a compact walkable campus, reinforce and extend the campus/courtyard concept, adding places for creative interchange and collaboration. Another goal is to protect the site's tree canopy, maintain bio-diversity, minimize runoff, and create a sustainable campus by maintaining the historic green buffer along New Hampshire Avenue. Chapter 2 of the Draft EIS discusses the alternatives considered in the EIS and provides a rationale for those that were dismissed. The land immediately adjacent to New Hampshire Avenue and Building One has always been considered a buffer and is now documented as a historic buffer. In addition there is a stream valley buffer that consumes a vast percentage of the area and much of the that area was reforested as part of the mitigation for the new bridge across Paint Branch Creek.

Comment 6: The DEIS discusses the existing transit network that serves the FRC. This includes several MTA and Ride-On routes as well as circulator shuttles from nearby Metro stations. The circulator shuttles make several stops within the campus. There is no existing “transit center” located on the White Oak campus.

Comment 7: Comment noted.

Comment 8: Comment noted.

Comment 9: Comment noted.

Comment 10: Comment noted.

Comment 11: Comment noted.

Comment 12: Comment noted.

Comment 13: Comment noted.

Comment 14: Comment noted.

Comment 15: Comment noted.

Comment 16: Comment noted

Comment 17: An amended determination of eligibility for the district may be considered following the execution of a Memorandum of Agreement.

Comment 18: The land immediately adjacent to New Hampshire Avenue and Building One has always been considered a buffer and is now documented as a historic buffer. In addition there is a stream valley buffer that consumes a vast percentage of the area and much of the that area was reforested as part of the mitigation for the new bridge across Paint Branch Creek.

Comment 19: Comment noted.

Comment 20: Comment noted.

Comment 21: See response to comment Montgomery County Office of Planning comment #3. Stormwater management pond #3 is not being moved as part of mitigation. It is to be relocated so that the East Loop Road can be reconfigured where the existing SWM pond #3 is. A Stormwater Management Plan is outlined in the Master Plan. The Plan will be designed to meet the unique characteristics of the site. Stormwater management is designed to control runoff for the purposes of reducing downstream erosion, water quality degradation, and flooding. Stormwater management is put in place near development not away from the development.

Comment 22: Comment noted.

Comment 23: Comment noted.

Comment 24: The Master Plan is consistent with the overarching goal of the Element to "locate the federal workforce in a way that enhances the efficiency, productivity, value, and public image of the federal government...". Relocating the current and potential future FDA employee population to a location within the District of Columbia is not a practicable alternative that GSA considered and would likely result in the fragmented location of headquarters operations.

Additionally, the original mandate from Congress was for GSA to use the 130- acre parcel of land to construct the FDA Headquarters. In FY 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." Consolidating FDA's headquarters operations under this Master Plan is consistent with both of these Congressional mandates.

Comment 25: Overall the Master Plan and the continued consolidation at White Oak is consistent with EO 12072. The FDA Campus is located within the NCR, an urban area, and the consolidation of FDA at White Oak is expected to help spur further economic development in the area.

From: Paul Gyamfi - WPDBA
To: Estes, Liz; Davis, Jessica; shelly.jones@gsa.gov
Subject: Fwd: FDA growth plan
Date: Friday, April 06, 2018 9:52:09 AM

FYI - FDA EIS comment

Begin forwarded message:

From: "Barbara Bernstein" <barbbtalks@aol.com>
Date: April 6, 2018 at 9:01:47 AM EDT
To: <paul.gyamfi@gsa.gov>
Subject: FDA growth plan

Dear Mr. Gyamfi,

I am concerned about the enormous traffic on New Hampshire Ave during rush hour.

#1

Have you ever attempted to drive to FDA from Langley Park around 6 pm? It can take 15 or 20 minutes to go those few blocks! It's unconscionable to add traffic to this area without a plan for adequate roads!! People will wind up leaving jobs that they get at FDA because it takes them an inordinate amount of time to arrive at work or get home, and local residents may move!!

My neighbors feel the same....
Please represent our wishes/feelings at the meetings on the planning.

Thank you.
Sincerely,

Barbara Bernstein

Email from Barbara Bernstein, April 6, 2018

Comment 1: Comment noted. Impacts to transportation and traffic have been taken into consideration in the EIS, Section 3.13. A traffic transportation analysis was conducted for the Master Plan. The results of this analysis are presented in the Transportation Technical Report found in Appendix G

From: Paul Gyamfi - WPDBA
To: Estes, Liz; Davis, Jessica; Shelly Jones - WPDBA
Subject: Fwd: DEIS planned expansion of the FDA White Oak campus
Date: Tuesday, April 10, 2018 3:53:00 PM
Attachments: image001.png

FDA DEIS Comment

Paul Gyamfi
Senior NEPA Compliance Specialist
General Services Administration
National Capital Region
Public Buildings Services
Office of Planning and Design Quality
301 7th Street, SW
Room 4004
Washington, DC 20407
Desk Tel: (202) 690 9252
Cell: (202) 440 3405

---------- Forwarded message ----------
From: **Bloom, Raanan** <Raanan.Bloom@fda.hhs.gov>
Date: Tue, Apr 10, 2018 at 3:31 PM
Subject: DEIS planned expansion of the FDA White Oak campus
To: "paul.gyamfi@gsa.gov" <paul.gyamfi@gsa.gov>

Dear Mr. Gyamfi.

This is in reference to the planned expansion of the FDA White Oak campus to consolidate FDA HQ to a single location. This consolidation would increase the existing FDA WO population from about 10,400 to approximately 18,000 and could have major impacts on the neighboring and FDA campus communities, traffic (on and off campus), transportation, commuting, parking and ecological resources. I understand that a Draft Environmental Impact Statement (DEIS) has been prepared. Although the White Oak community was involved in early scoping design considerations, the FDA WO community was apparently not informed or involved in development of this plan. I believe the FDA community should have been involved from the early planning stages for this project and that GSA should have provided briefings to FDA at WO. Can GSA provide a briefing at FDA WO and provide an opportunity for FDA employee involvement before the EIS process proceeds any further?

#1

Thank you for your consideration,

Ron

Raanan (Ron) A. Bloom, Ph.D.
Environmental Assessment Team

Center for Drug Evaluation and Research

U.S. Food and Drug Administration
10903 New Hampshire Ave.
Silver Spring, MD 20993-0002

Phone: 301-796-2185
e-mail: raanan.bloom@fda.hhs.gov

Raanan Bloom, April 10, 2018

Comment #1: GSA conducted public scoping for the MP EIS. The public scoping period was from August 17, 2017 to September 25, 2017. A public scoping meeting was held on September 12, 2017. The scoping period was announced through a Notice of Intent in the Federal Register on August 17, 2017 and in the Washington Post and the Prince George's and Montgomery Sentinels. In addition, the draft EIS was available for public review and comment from March 2, 2018 through April 16, 2018 with a public hearing being held on March 22, 2018. A federal register notice was issued on March 2, 2018 and a notice was also placed in the Washington Post and the Prince George's and Montgomery Sentinels.

The Draft EIS was also available at the Beltsville, Silver Spring, and White Oak public libraries.

From: Paul Gyamfi - WPDBA
To: Estes, Liz; Davis, Jessica; Shelly Jones - WPDBA
Subject: Fwd: DEIS planned expansion of the FDA White Oak campus
Date: Tuesday, April 17, 2018 9:16:41 AM
Attachments: image001.png

FDA EIS Comment from FDA Employee

Paul Gyamfi
Senior NEPA Compliance Specialist
General Services Administration
National Capital Region
Public Buildings Services
Office of Planning and Design Quality
301 7th Street, SW
Room 4004
Washington, DC 20407
Desk Tel: (202) 690 9252
Cell: (202) 440 3405

---------- Forwarded message ----------
From: **Bloom, Raanan** <Raanan.Bloom@fda.hhs.gov>
Date: Sun, Apr 15, 2018 at 11:13 AM
Subject: RE: DEIS planned expansion of the FDA White Oak campus
To: "paul.gyamfi@gsa.gov" <paul.gyamfi@gsa.gov>

Hello Mr. Gyamfi,

I am interested in hearing if GSA can provide a briefing on the FDA White Oak Campus EIS and provide an opportunity for FDA employee involvement before the EIS proceeds?

#1

Thank You

Raanan Bloom

From: Bloom, Raanan

Raanan Bloom, April 15, 2018

Comment #1: GSA conducted public scoping for the MP EIS. The public scoping period was from August 17, 2017 to September 25, 2017. A public scoping meeting was held on September 12, 2017. The scoping period was announced through a Notice of Intent in the Federal Register on August 17, 2017 and in the Washington Post and the Prince George's and Montgomery Sentinels. In addition, the draft EIS was available for public review and comment from March 2, 2018 through April 16, 2018 with a public hearing being held on March 22, 2018. A federal register notice was issued on March 2, 2018 and a notice was also placed in the Washington Post and the Prince George's and Montgomery Sentinels.

Sent: Tuesday, April 10, 2018 3:31 PM
To: 'paul.gyamfi@gsa.gov' <paul.gyamfi@gsa.gov>
Subject: DEIS planned expansion of the FDA White Oak campus

Dear Mr. Gyamfi.

This is in reference to the planned expansion of the FDA White Oak campus to consolidate FDA HQ to a single location. This consolidation would increase the existing FDA WO population from about 10,400 to approximately 18,000 and could have major impacts on the neighboring and FDA campus communities, traffic (on and off campus), transportation, commuting, parking and ecological resources. I understand that a Draft Environmental Impact Statement (DEIS) has been prepared. Although the White Oak community was involved in early scoping design considerations, the FDA WO community was apparently not informed or involved in development of this plan. I believe the FDA community should have been involved from the early planning stages for this project and that GSA should have provided briefings to FDA at WO. Can GSA provide a briefing at FDA WO and provide an opportunity for FDA employee involvement before the EIS process proceeds any further?

Thank you for your consideration,

Ron

Raanan (Ron) A. Bloom, Ph.D.
Environmental Assessment Team

Center for Drug Evaluation and Research

U.S. Food and Drug Administration
10903 New Hampshire Ave.
Silver Spring, MD 20993-0002

Phone: 301-796-2185
e-mail: raanan.bloom@fda.hhs.gov

FDA U.S. FOOD & DRUG ADMINISTRATION

From: Paul Gyamfi - WPDBA
To: Estes, Liz; Davis, Jessica; Shelly Jones - WPDBA
Subject: Fwd: 2018 DRAFT ENVIRONMENTAL IMPACT STATEMENT U.S. FOOD AND DRUG ADMINISTRATION CONSOLIDATION AT WHITE OAK SILVER, SPRING, MARYLAND
Date: Tuesday, April 10, 2018 10:25:33 AM

FDA DEIS Comment

Paul Gyamfi
Senior NEPA Compliance Specialist
General Services Administration
National Capital Region
Public Buildings Services
Office of Planning and Design Quality
301 7th Street, SW
Room 4004
Washington, DC 20407
Desk Tel: (202) 690 9252
Cell: (202) 440 3405

---------- Forwarded message ----------
From: **Andrea Chamblee** <achamblee61@gmail.com>
Date: Mon, Apr 9, 2018 at 2:15 PM
Subject: 2018 DRAFT ENVIRONMENTAL IMPACT STATEMENT U.S. FOOD AND DRUG ADMINISTRATION CONSOLIDATION AT WHITE OAK SILVER, SPRING, MARYLAND
To: paul.gyamfi@gsa.gov

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

RE: 2018 DRAFT ENVIRONMENTAL IMPACT STATEMENT
U.S. FOOD AND DRUG ADMINISTRATION CONSOLIDATION AT WHITE OAK SILVER, SPRING, MARYLAND

Dear Mr. Gyamfi:

I am writing to comment on the plan to expand the FDA campus.

I live approximately 4 miles away from the White Oak campus. It is a 13 minute drive.

It should be a 1-hour ride using public transportation, but that is only if each of the three buses that I have to take (C2, Z8, and C10) is on time and not too early or late for me to

#1

miss a transfer. It also requires 20 minutes of waking, not always possible with a lap top and high heels, especially in bad weather. Generally, it takes 90 minutes to travel these 4 miles. Even if the buses align, the bus is at most only 20 minutes faster than walking the entire distance, and if the buses don't align, walking is faster.

Biking would be the ideal compromise, except the route is nothing less than hazardous. The only bike lane from my residential area, one with over 100 FDA employees, is a poorly designed joke of a bike lane that runs along New Hampshire Avenue for less than ½ a mile, through the dangerous intersection at Lockwood Ave before it dumps the cyclist in the middle of a cloverleaf to Route 29, with multiple occasions for right-turning cars to drive through the bike lane. The lane doesn't even go in the right direction for my commute.

I've traveled this route twice, and each time I was not willing to bet that I would survive the trip.

The bike and bus planning for this route to date has been shameful and abysmal.

Even the current plans such as for buses in the nearby 29 corridor don't originate in residential areas, requiring commuters to already start their commute in their cars. They don't include bus or carpool lanes such as in the densest Route 29 traffic regardless. Together, these glaring errors make commuting by public transportation non-competitive on every element: (1) time, (2) cost, (3) safety and (4) reliability.

I urge planners to use the vast information currently available thorough Commuter Connections and FDA databases to plan for extensive bike and bus routes to this expanded worksite. These modes deserve an equal prominence in the planning; I believe they should be considered superior and preferable to the obsolete car-dependent plan currently in operation at the White Oak campus.

Planners must start making other modes of commuting (bike, public transportation) competitive on time, cost, safety and reliability. In its present state, it is not competitive on a single one.

Andrea Chamblee, Esq, RAC
727 Hillsboro Drive
Silver Spring, MD 20902
301-807-0161

#1 Cont.

#2

#3

#4

Andrea Chamblee April 9, 2018

Comment 1: Comment noted.

Comment 2: Comment noted.

Comment 3: Comment noted.

Comment 4: Comment noted.

From: Paul Gyamfi - WPDBA
To: Estes, Liz; Davis, Jessica; Shelly Jones - WPDBA
Subject: Fwd: Comments on Draft 2018 FDA Federal Research Center Master Plan
Date: Tuesday, April 17, 2018 9:21:00 AM

FDA EIS Comment from Ms Finnegan

Paul Gyamfi
Senior NEPA Compliance Specialist
General Services Administration
National Capital Region
Public Buildings Services
Office of Planning and Design Quality
301 7th Street, SW
Room 4004
Washington, DC 20407
Desk Tel: (202) 690 9252
Cell: (202) 440 3405

---------- Forwarded message ----------
From: **Eileen Finnegan** <finnegan20903@yahoo.com>
Date: Mon, Apr 16, 2018 at 8:58 PM
Subject: Re: Comments on Draft 2018 FDA Federal Research Center Master Plan
To: Paul Gyamfi - WPDBA <paul.gyamfi@gsa.gov>
Cc: Dawud Abdur-Rahman - WPDB <dawud.abdur-rahman@gsa.gov>, Shelly Jones - WPDBA <shelly.jones@gsa.gov>, Stephanie Hamlett - Wpdba <stephanie.hamlett@gsa.gov>

Hello Mr. Gyamfi,

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

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

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

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

further encourage community connections.

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

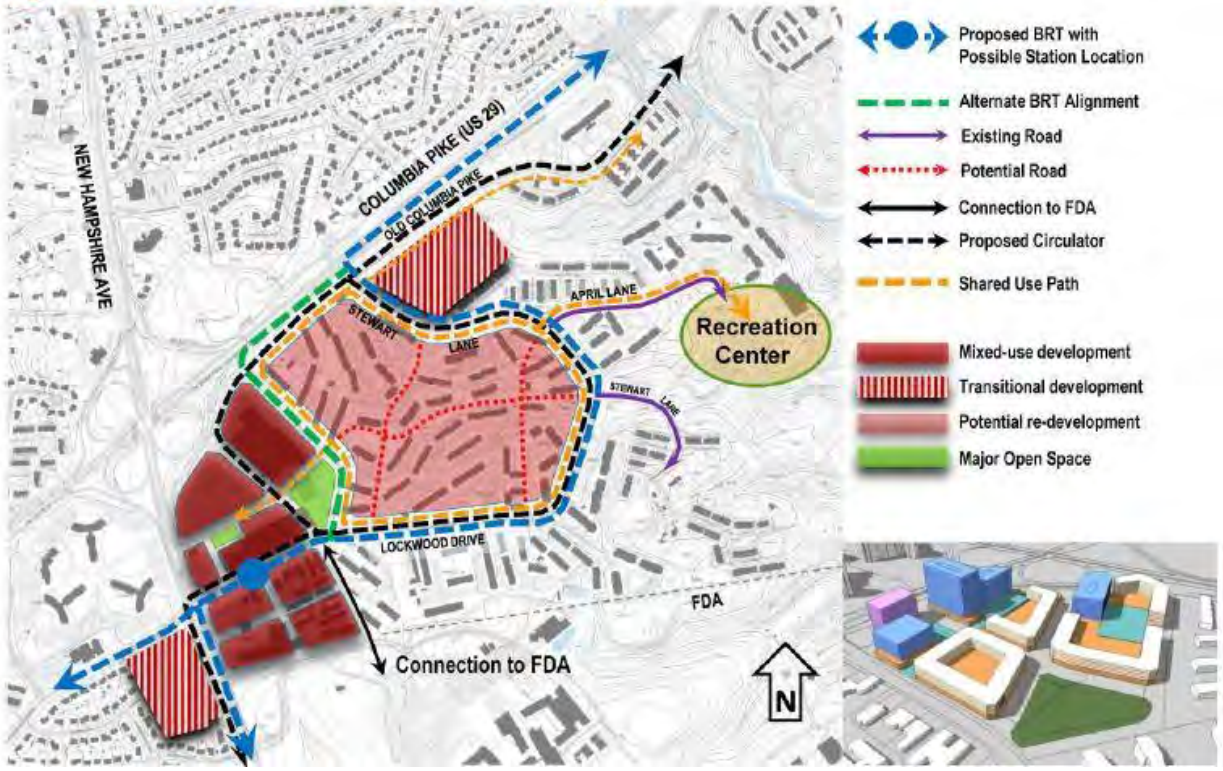
4. Stantec's Traffic Analysis used the 2015 Sabra Wang Study (for the Local Area Transportation Improvement Plan), but then, at the direction of the Montgomery County Department of Transportation, added several specific development projects (Adventist Hospital, DAR Cars, White Oak Town Center, Hillandale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

5. Although the near-term FDA HQ Housing Strategy/Mitigation Plan undoubtedly assumes that all traffic impacts will be the responsibility of the private property owner, there is one aspect which GSA/FDA should evaluate: employees using the internal FRC roadway as a cut-through for travel to and from work. For example, consider any FDA employees at a leased facility on FDA Boulevard using the New Hampshire Avenue Beltway exit by traveling through the campus to/from work. This would certainly cut their travel time. This real world work-around is not considered in any travel model for the area. #5

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

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

Figure 2 White Oak Center Illustrative Concept



Email from Eileen Finnegan, April 16, 2018

Comment 1: The FDA HQ Housing Strategy contains information that is procurement sensitive. The FDA Master Plan has looked at consolidating up to 18,000 people on the FDA Campus at White Oak.

Comment 2: FDA and GSA will continue to coordinate on a future potential connection.

Comment 3: Comment noted.

Comment 4: The additional developments were added in at the request of Montgomery County to account for development sites, or changes to development plans, that were not accounted for in the LATIP.

Comment 5: Comment noted.

Gail Fisher
10412 Rodney Road
Silver Spring, MD 20903

Dear Mr. Gyamfi:

Please accept the following comments with respect to Environmental Impact Statement for the proposed FDA expansion at the GSA property in White Oak, MD.

1. *Proposed Alternatives are Unnecessarily Constrained:* The FDA expansion, as described in the Master Plan and Environmental Impact Statement (EIS) considers three alternatives for achieving the goals of the FDA consolidation. However all three alternatives are conceived only in terms of additional federal investments in structures and facilities on the FDA/GSA campus at White Oak. None of the alternatives considers the possibilities of using currently existing or soon to be developed properties directly associated with the FDA campus. Therefore the EIS neglects obvious possible efficiencies which may reduce risk, investments, and long-term maintenance costs incurred by all parties by the FDA expansion. The FDA/GSA should more carefully re-examine options through the EIS process.

#1

- Viva White Oak offers significant unexplored potential. Simultaneous to the proposed expansion at White Oak, developers at the Viva White Oak development are proposing a large office/mixed use development including a conference center, laboratory, office and commercial space directly at the FDA gate on the north east side of the FDA property.

#2

VIVA WHITE OAK

The FDA expansion for all three options includes a conference center, cafeteria, a large visitor center, visitor parking, and additional office spaces which introduce significant risk to the FDA. Specifically, these facilities will cost millions to build and maintain, and once built demand ever greater investment in maintenance even as work trends are moving away from maintaining large offices and infrastructure. The added risk to the FDA of building a large conference facility likewise lies in the move toward mobile and technologically supported collaboration and conferencing, making large conference spaces that require heating, cooling and maintaining a questionable and risky investment.

#2 Cont.

The Viva White Oak developer likewise is taking on significant risk should they build the proposed large office/laboratory and conference facilities given the over-built environment in Montgomery County. The most recent publicly available information indicates that Montgomery County had a nearly 15% office vacancy rate – with approximately 20 office buildings totaling 3.3 million square feet standing vacant.[i] A conference center and associated hotel can bring significant revenue streams, although presents risks in being self-sustaining. Successful development of the hotel/conference center will require a strong public-private partnership in order ensure the investment and utility success of the endeavor. The success of the Viva White Oak office/conference facility depends upon attracting scientific and health organizations.

Beyond the significant risk being contemplated by both the GSA/FDA as well as the Viva White Oak developer, the community and county are taking on significant costs both in terms of concessions being made to support both parties but also in terms of traffic and roadway investment commitments. The FDA/GSA does not pay taxes on the large property at White Oak, yet will burden county-provided services such as fire and safety and roadway maintenance. The EIS argues that the consolidation of FDA requirements onto the White Oak campus will benefit the FDA employee base through improved collaboration. The traffic burdens and costs, the fire and safety burdens and costs, and the environmental impact that will be imposed by the waste and water runoff for BOTH the FDA/GSA and Viva White Oak could all be mitigated through combined and cooperative public-partnership. FDA/GSA and Viva White should formally examine FDA requirements and determine the costs, risks and feasibility associated with a public-private partnership to combine development objectives.

#3

Further, GSA/FDA have not fully considered collaboration on and investment in consolidated facilities using other nearby existing facilities. For example, there is significant parking capability at the nearby White Oak shopping center that daily remains unused which the FDA may be able to lease, rather than build more impervious structure. There are several local office buildings with advertised vacancies which also might present opportunities to advance FDA objectives, but which would reduce risk, investment and contribute to the local economy. For example, the FDA might consider using existing nearby vacant office space to develop conferencing capability as opposed to building a new structure.

#4

Ideally the FDA/GSA would have already accomplished a return on investment analysis of proposed capabilities in the Viva White Oak development, using existing nearby parking at the White Oak Sears' location, and nearby office building availability for the EIS. However this has not been disclosed if it has been accomplished.

#5

2. The EIS has failed to comprehensively address myriad costs and produce return on investment analyses or risk analyses associated with the proposed alternatives.

#6

There are many specific issues that the EIS has failed to address: Risks associated with federal funding cycles, FDA overbuilding, and changing work habits; tangible and intangible costs to the county and the community to enable the expansion of the FDA so its employees can collaborate; the cost or benefit to the community in the event of natural or manmade emergencies – the resilience of the community; trip generation by the entire site, to include trip generation PER DAY PER EMPLOYEE, the number of visitors, the number of trucks and heavy service vehicles, along with noise, speeding and pollution burdens associated with the increases. The EIS presents simplified and unsatisfactory analyses and some proposed solutions that provide insufficient information for decision making.

- Risks associated with over-development and investment given the current trends in office space and conferencing use. How will the FDA handle any decreases in employee population? Are there methods for expanding ***current*** buildings to accommodate proposed uses – through additions or re-design of interiors and what are the costs and benefits of these alternatives? What are the costs and benefits of those possibilities? Spending federal tax dollars on an expansion must be carefully examined in terms of adaptability, flexibility and resilience of the facilities to potential further expansion or future contraction of the employee base. Also not addressed is the federal funding cycle and the unreliability of that funding stream. What is the FDA plan should it not receive all federal funds to implement its master plan? This is a more real possibility than seems recognized by either the Master Plan itself or the EIS.

#7

- Tangible and intangible costs that will be required of the county to support the expansion. Specific investments will have to be made in:
  - Roadway enhancements. The EIS comprehensively addresses the transportation issue, yet neglects to discuss specific costs for improvements and long-term costs for maintenance. For example, increasing the traffic flow on Highway 650 by an additional 10,000 trips in the AM and PM peak hours will potentially tip the scale for that road in terms of noise, pollution and congestion. How much will mitigating improvements cost to implement and maintain? There are both dollar costs as well as the county infrastructure and community tolerance that must be developed – the intangible costs. None of the tangible nor intangibles are discussed.
  - Fire and safety enhancements. A larger fire station and roadway/signaling improvements to enable appropriate responsiveness will be required, but the EIS does not articulate what those costs will be to implement and maintain. Likely millions of dollars will be spent by the county to enable the safety of the FDA expansion. Yet the EIS is relatively quiet about the timing of the expansion vice the proposed move of the fire station, the costs to the community of losing a nearby fire station (in terms of insurance discounts or safety) so as to enable FDA expansion, nor the predicted burden imposed on the fire and safety infrastructure itself.
  - Sewer and outfall improvements. The Anacostia River will receive the increased storm outflow from the FDA expansion. What will the clean-up for this cost the localities along the Anacostia River? The EIS description is needlessly focused on simply the immediate property boundaries, and mentions the storm run off without describing health, financial or social implications.

#8

- Resilience of the FDA campus and surrounding community. The GSA/FDA White Oak campus has the potential to improve the entire community. How will the GSA/FDA campus provide infrastructure in the event of natural or manmade disaster? What are the current resources available on the campus, and how can it be used by the community?
- Noise, trash and geographic separation caused by additional traffic. As described below, the EIS presents incomplete and missing information concerning the overall traffic imposition on the community. Included in the missing/incomplete information: parking counts, trips of service vehicles to service the cafeteria and distribution center, number of predicted visitors attending the conference center and various offices, number of increased trips for fire and safety vehicles, signal accommodations for fire and safety, geographical divide caused by pushing 20,000 vehicles a day on already over-taxed roadways.

#8 Cont.

3. The EIS presents conflicting and incomplete information concerning the total number of trips generated on a daily and peak hour basis for the entire campus, and the total burden that will be imposed by the traffic in terms of noise, pollution and geographic separation. The incomplete data create a misperception about the total volume of traffic that will be imposed upon the local community both in terms of quality of the environment as well as in terms of real property value. The number of parking spaces currently on the property and planned is inconsistent throughout the document. Parking spaces would provide an indication of trip generation. Trips per day per employee is missing. The table that specifies the numbers of trips on peak AM and PM hours through intersections accounts for about 1/4 of the total trip generation hinted at by the EIS. The Transportation Mitigation Plan does not specify the probable reduction in trips generated by the expansion in a helpful way, and hints at the futility of the recommendation to solve any of the major impositions in a meaningful way. There are obvious disparities that need to be clarified, and the associated burdens and costs laid out in real terms. Specific issues:

#9

- Number of parking spaces unclear. The EIS and annexes say that the parking plan is for 1 parking space per 1.8 employee. If the FDA is planning for 18,000 employees, this would mean 10,000 spaces. However in many places the EIS claims that the FDA wants a total of 10,987 spaces, and in some places the employee space total is 10,094[iii]. In other places the EIS claims that the total number of spaces would be 11,709—the increase is for visitors and support staff[iii]. However at one point the EIS claims that the visitor spaces will increase from 1,000 to 1,615. In other places the EIS claims that the FDA wants to add 7,463 additional spaces to the current number. The current number of spaces is stated to be 6,817[iv]. The sum of those two numbers, therefore, would be 14,280 spaces. This number is far above the 1:1.8 ratio. Although parking is an issue the implications of the parking situation on the campus will affect the community because of the burden on the already over-taxed roadway. Understanding exactly how many parking spaces are going to be provided on the campus will help the community understand how many additional cars will be imposed on the roads each day.
- Trips per employee per day seem to be missing. I calculate **29,432 additional trips** will be generated during peak hours. Page 6 of the Transportation Management Plan claims that a trip generation rate per employee was calculated, but seems to be missing. The number of trips per day imposed upon the road network is a critical piece of

#10

#11

information to understand the full impact of the proposed expansion on the roadways. Using information in the EIS:

- If 85% of the 18,000 population is on the campus at any given time, the employee population would be 15,300.
- The visitor parking would indicate an additional population of at least 1,615 is envisioned, for a total daily population of approximately 16,915 (15,300 + 1,615).
- Of that population, approximately 75% would commute via personal vehicle, or about 12,686 vehicles. Also, of the remaining 25% there would be carpool trip generation—say trip generation would be about an additional 12% of the total (or, less than ½ of the 25% that didn't drive themselves to work in their own vehicle). This generates an additional 2,030 'people'. This totals 14,716 'people' making trips. It does NOT include the numerous bus and shuttle loops which put heavy and loud vehicles on the roadways.
- If there are 14,716 employees and visitors making trips, we can safely assume that they will make 2 trips a day – once TO the facility and once AWAY from the facility. ***That, then means a total of 29,432 trips could be generated by the employees and visitors A DAY.*** Trucks, service vehicles, delivery vehicles, maintenance, bus and van, and other vehicle traffic is not included, even though the FDA expansion calls for a cafeteria, conference center, and 23,000 SF visitor center.

#11 Cont.

Given the already over-taxed roadways, this is not an insignificant number of trips per day – mostly during peak hours – that will add to roadway pollution, maintenance, and noise.

#12

- The EIS analysis of intersections in Table 22 of the EIS Executive Summary only assumes a total of 6,698 trips during peak AM and 5,342 trips during peak PM hours, which must be about 1/4 of what the actual burden will be. Yet these numbers do not even explain current employee populations. If there are 10,987 employees, and 75% drive to work, that would mean 8,240 trips are generated, not 6,698. When a future employee population of 18,000 is envisioned along with a visitor population, the burden on intersections must be nearly quadruple what the table shows.

#13

- There is no explication of truck, heavy vehicle, service vehicle, bus or van traffic that will be generated by the expansion. The FDA master plan calls for a conference center, cafeteria and distribution center, however does not project the increase in heavy vehicle traffic that would be induced by these facilities. Although the Transportation Management Plan calls for increased van pooling, buses to circulate to bring people to work from park and ride sites and more county buses, these all add noise and pollution beyond car traffic. Yet the EIS provides NO accounting for this burden.

#14

- The EIS only examines the impact of traffic on intersections, not on pollution, noise or geographical separation that is being caused by the roadways. Both Hwy 29 and Hwy 650 have expanded to the point where they are generating significant noise pollution and geographic division. Crossing either Highway 29 or Highway 650 on foot is dangerous. Yet the EIS does not contemplate the geographic and noise issues that are associated with the expansion. Further expansion will only serve to decrease home

#15

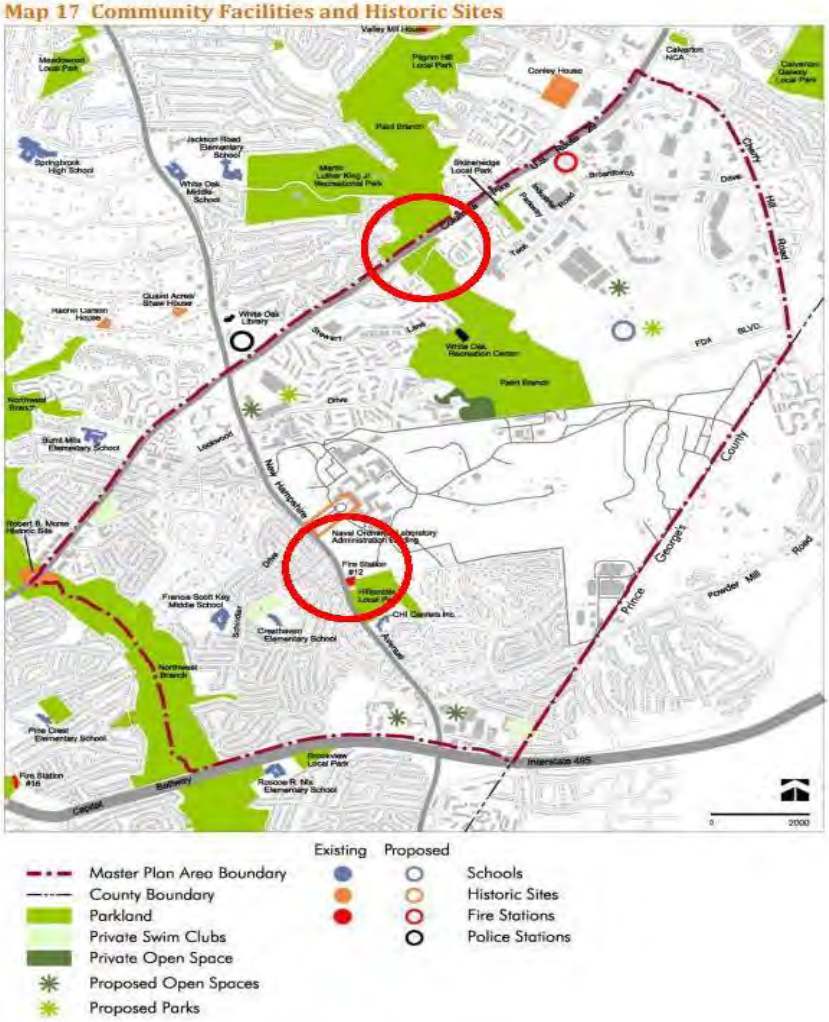
values in the area as it becomes louder and more congested. The EIS fails to estimate the costs to property values imposed by the expansion.

#15 Cont.

- The Transportation Management Plan (TMP) and the Traffic Technical Report (TTR) are incomplete and illogical and try to address the traffic problem in a less than holistic way. The TMP and the TTR examine possible mediation to the already egregious transportation problems at White Oak by only addressing a) improvements at intersections requiring investments by Montgomery County and Maryland; b) increased bus services which would also require investment by Montgomery County; and c) implementation of the Bus Rapid Transit (BRT) system on Hwy 29 and Hwy 650 which also require significant investment by Montgomery County. Although much is being made of the BRT system on Hwy 29, this transportation mode will only handle approximately 13,000 people a day and will move commuters from the north east in to Silver Spring. According to the employee survey data presented by the EIS on page 5 of the TTR, most employees live in the opposite direction, toward Rockville. Therefore, it is doubtful that this proposed solution will present a significant mitigation for the traffic issue. Other obvious solutions were not proposed nor addressed. For example, when considering the total roadway burden proposed by ALL development in the White Oak area, there will likely be an increase of more than 300,000 trips generated EACH DAY. The FDA/GSA should partner with Viva White Oak and current office and commercial space owners to examine ways to meet all goals. Were FDA/GSA able to use the Viva White Oak conference center, for example, that may decrease the total traffic burden that would be added by have TWO conference centers. Finally, the roadways that delineate the White Oak area (HWY 650, HWY 29, Cherry Hill Road), are major geographic dividers with speeding, heavy traffic, noise pollution, and trash decreasing the quality of life and property values of the residents. The EIS is silent on remediation for these issues. The FDA might build a pedestrian bridge over HWY 650, for example, to enable commuters to reach the proposed bus terminal at the FDA HQ site, and to access the local park. Likewise a pedestrian bridge might be created over Hwy 29 to connect the community north toward the Martin Luther King Community Center. A map is provided below to illustrate:

#16

Map 17 Community Facilities and Historic Sites



Red circles indicate potential sites for pedestrian/bike overpasses to connect the community.

4. **The EIS does not examine the environmental, social or traffic issues related to positioning the truck screening facility on Hwy 650 along with the 23,000 SF visitor screening center, nor the impact of positioning the bus and transit center off HWY 650 well onto the FDA property.** The three alternatives presented in the Master Plan seem to be prepared solely with the employees of the FDA in mind. The transit center is well back from HWY 650, and implies an added burden to that road from increased bus

#17

and van traffic. Pedestrian traffic from the nearby community trying to take a local bus would have to brave 7 lanes of traffic moving usually at speeds of around 50 mph to get to the transit center. The truck screening facility is likewise being planned for a location directly off HWY 650, which would then increase traffic on that roadway with vehicles that would only increase noise pollution, trash and air pollution from diesel fumes. The truck traffic volume is missing from the EIS analysis, but it likely would be significant in that it would support a 64,000 SF conference center and a 97,000 SF distribution center, along with a cafeteria of unspecified size. Alternative locations are presented in the Master Plan (page 105), some of which are squarely in the forested area along Paint Branch Creek. The FDA Property line extends to Cherry Hill Road, and nowhere has the FDA explained why it would not use this corridor for a truck/service vehicle route. Finally, the EIS does not specifically examine the impact of a 23,000 SF visitor screening facility to the traffic and security of the community, nor does it address any alternatives.

#17 Cont.

5. The EIS does not explain environmental impacts of the proposed expansion on the Anacostia River, the Paint Branch Creek, and the surrounding community. The EIS nowhere examines the noise pollution that will be caused by the heavy increase in traffic. The EIS discusses the increase in impervious surfaces, yet the Master Plan indicates several small areas for potential permeable paving. Recent advances in construction technology have produced permeable concrete that is being used by Federal properties to construct parking lots and walkways that mitigate storm runoff. However the EIS appears to not address these potentialities and discuss cost versus benefit tradeoffs. The EIS is inconclusive regarding the effects on the Paint Branch Creek and the Anacostia. It is entirely unclear how much more or less storm water would be pushed into Paint Branch Creek and what the effect would be on the Anacostia River. The EIS does describe the 8 watersheds that it believes to fall under the Federal Clean Water Act or Maryland's own waterways act, but does little further to describe how the proposed development might affect those wetlands for the public to understand.[v] (Moreover the maps and data sheets are not posted to the GSA website.)

#18

6. The EIS and Maser Plan do not address community recreation potentialities as a possible 'benefit' that might counterbalance the considerable amount of detriment being imposed. One possible way to mitigate traffic congestion and noise pollution is through provision of other solutions. For example, the FDA could create a secure perimeter around its buildings (as currently proposed in the Master Plan), and allow public access through the Paint Branch Creek stream area through to the north side of Hwy 29, creating a connection to the Martin Luther King park. Similarly, rather than installing a bike lane on the 7-lane Hwy 650 that nobody in their right mind would use, the FDA could install a bike/hike path along the natural area just inside the current fence line, but outside the security perimeter that would connect to the proposed transit terminal, White Oak shopping area, and even to a trail along 29 with a pedestrian bridge to cross over to the north side. Or, finally, the FDA/GSA could consider ways to develop a more community-friendly rapid transit hub that both the community and the employees would benefit from, more accessible to the community than what is being proposed. These are three ideas that provide suggestions for tradeoffs that could be made to mitigate the increasing burden on the community and taxpayers of Montgomery County being imposed by the FDA expansion.

#19

Conclusion

The issues raised above are of considerable concern, and require thoughtful answers. While the expansion at the FDA site in White Oak can bring many possibilities for the local community, current

#20

plans and explanations appear to be addressed to the employee base as opposed to the community. The GSA "Good Neighbor" program is nowhere in the plan and the FDA/GSA has made little apparent effort to determine how to best invest in the property in a way that will connect to the community. The placement of the transit hub far off an already over burdened roadway is a prime example of how the GSA/FDA plan serves the FDA employee base, with little consideration for the community.

#20 Cont.

Thank you for the opportunity to comment.

Gail Fisher

10412 Rodney Road

Silver Spring, MD 20903

Gail.fisher@gmail.com

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[i] http://montgomeryplanning.org/tools/research/special-studies/office-market-assessment-study/
[ii] Page iv in the Executive Summary.
[iii] Page 9 of the Transportation Management Plan.
[iv] Page iii of the Executive Summary
[v] Page 10 of Part 3 of the EIS – Stantec examination of the wetlands

Gail Fisher, Silver Spring

Comment 1: Comment noted. Please be aware the proposed Master Plan and Land Use Feasibility Study that proceeded it is focused on studying the capacity of the Federal Research Center to accommodate a growth of about 7,000 people within the campus. The master plan is long term vision. FDA's primary goal is to have all staff within walking distance of one another to promote innovation and collaboration. In the short-term. there may be alternatives off-site. However the current study is focused exclusively on the FRC site.

Comment 2: See response to comment 1.

Comment 3: See response to comment 1.

Comment 4: See response to comment 1.

Comment 5: See response to comment 1.

Comment 6: NEPA does not require Federal agencies to prepare cost-benefit analysis as part of an EIS (40 CFR 1502.23).

Comment 7: See response to Comment 6.

Comment 8: See response to comment 6. Impacts to police, fire, and ems facilities is discussed in Section 3.11.4 of the EIS. Impacts to the sewer system are discussed in Section 3.14.2. WSSC was consulted with during the analysis for the EIS.

Comment 9: Page 50 of the TTR provides a detailed explanation of how the number of additional AM and PM peak hour trips were calculated. Evaluating AM and PM peak hour trips is an industry standard method for assessing transportation impacts and determining the level of mitigation provided. Based on employee arrival and departure data, the peak hour accounts for approximately 33% of employee arrivals and departures which is the highest concentration of employee trips on the network at any given time. While total daily trips was not computed for this analysis, we anticipate that as much as 60% of the total daily trips would occur between 6:00 AM and 10:00 AM and 3:00 PM - 7:00 PM as most employees arrive in the morning, stay on campus all day, and depart in the afternoon, representing a total of two trips per day. It should also be noted that the parking supply will only provide capacity of 54% of all employees. Thus, the total number of employees does not directly correlate to the total number of additional vehicles being generated. 46% of employees must arrive by other modes, such as transit, and the TMP reflects a robust and detailed plan for achieving the 46% goal. We disagree that the TMP fails to reduce trips. While the plan notes the challenges in reducing trips, it provides a clear and direct implementation plan for achieveing the 46% vehicle trip reduction goal.

Comment 10: As stated in Chapter 3, 2nd paragraph of the Traffic Technical Report (TTR) (Appendix G), there are currently 6,817 parking spaces for approximately 10,987 employees and support staff. In the proposed plan, approximately 2,544 spaces will be removed, approximately 4,273 will remain, and an additional approximate 7,463 will be constructed, for a total of 11,709 spaces. Approximately 1,615 of the new spaces will be for visitors. The remaining 10,094 parking spaces will be designated for the 18,000 employees and support staff. The parking ratio refers to these values.

Comment 11: The traffic analysis is based upon standard methodology to determine the site-specific trip generation rate per employee. It is located in the Traffic Technical Report (TTR) (Appendix G) on pages 45 and 46, Tables 13-15. The trip generation is based on total entering and exiting vehicles which takes into account visitor trips, contractors, and deliveries. It is not anticipated that the visitor parking lot would be completely full everyday - conferences involving a significant number of outside visitors are not daily occurrences. However, it should be noted that trip generation is only reported for the AM and PM peak hour which are the critical hours for the study area roadway network, not the entire day.

Comment 12: Comment noted

Comment 13: The methodology used to determine the site-specific trip generation rate per employee is located in the Traffic Technical Report (TTR) (Appendix G) on pages 45 and 46, Tables 13-15. The analysis assesses the impact of the additional employees only. The impact of the existing employees is already accounted for in the existing condition analysis.

Comment 14: The data that was collected to develop a trip generation rate included all vehicle types including employee, visitor, bus, contractor, and truck trips. Therefore, the resulting trip generation includes these trips. However, it should be noted that truck trips are likely to occur during off-peak hours.

Comment 15: Noise pollution: Section 3.1.5 of the Draft EIS discusses the impacts from noise.

See response to Comment 6 regarding cost benefits.

Comment 16: The TTR and TMP are intended to work together to identify methods to mitigate the increase in traffic congestion as a result of the expansion. A multi-factor approach is recommended in both documents which utilizes a combination of transit, FDA shuttles, carpool and vanpool, ped/bike improvements (which have been expanded), teleworking, and roadway/intersection improvements. Ongoing coordination with the County and State will be conducted over the development of the site plan to finalize the overall mitigation measures. Leasing space from nearby developers, such as Viva White Oak is not being considered as part of the master plan.

Comment 17: Comment noted. The environmental and social impacts of the proposed master plan, which includes the truck screening area, can be found in Sections 3.1 through 3.10 of the EIS. Traffic Impacts are discussed in Section 3.13 and Appendix G of the EIS. The data that was collected to develop a trip generation rate and subsequently assess additional impacts on the roadway network included all vehicle types: employee, visitor, bus, contractor, and truck trips. It should be noted that the truck trips are likely to occur during off-peak hours.

Comment 18: As stated on in Section 3.0 of the EIS, the affected environment that was used for this EIS includes: the western part of the FRC and the National Capital Region.

Noise pollution: Section 3.1.5 of the Draft EIS discusses the impacts from noise.

Impervious surfaces: Section 3.3.5 of the Draft EIS states: "Potential types of LID/BMP facilities for the expanded FDA Campus are: ...Pervious Pavements (The best opportunities on the campus are likely to be fire lanes, sidewalks, paths, and other hardscape areas)..." We did not include "parking lots" on this list because the idea is to not include any new surface lots and the new structural parking areas will replace existing surface parking lots. The Final EIS will provide the following figures that are found in the

Draft MP: figures 3-41, 43, 45, which show some potential locations for pervious pavements in hardscape areas.

Impacts on streams: Section 3.3 of the Draft EIS discusses the water resources that would be affected by the proposed Master Plan. This section also addresses the impacts to these resources and mitigations that would be implemented. Additional graphics from the Master Plan will be incorporated into the Final EIS that will further clarify this. Figures 17 and 18 in the Draft EIS show the existing water resources on the campus. The Wetland Technical Report was provided as Appendix B in the EIS. This technical report provided maps and data sheets.

Cost vs. Benefits: See response to Comment 6.

Comment 19: A Record of Decision will be signed by the GSA NCR Regional Commissioner that will outline mitigation that GSA/FDA will be responsible for carrying out for this Master Plan. GSA/FDA will continue to work with Montgomery County to determine if a MOU is necessary.

Comment 20: GSA has followed the Good Neighbor Program principles through the following:

1. Locate new owned and leased Federal facilities in places that support local economic development and planning goals as well as Federal sustainability goals: By expanding the FDA Campus at White Oak, GSA is supporting the local economic and development planning goals of Montgomery and Prince George's counties. see sections 3.8-3.10 of the Draft EIS)

2. Design new facilities to deliver attractive public spaces that integrate with their surroundings and support neighborhood urban design goals: GSA/FDA have strived to integrate the FDA Campus into the surrounding community. This has been seen through the reuse of Building 1 and retaining the historic green buffer zone.

3. Renovate and revisit existing Federal properties over time to improve Federal public spaces and facility function within the neighborhood: GSA/FDA has accomplished through the reuse of Buildings 1 and 100.

4. Manage Federal properties as a public resource by encouraging shared public use and openness: GSA is currently working M-NCPPC to review the inputs collected from the community during scop8ing and to collaborate to identify possible uses.

5. Participate in neighborhood physical and management improvement efforts around Federal projects and properties as an active civic partner in the community: FDA has continuously with community throughout their history at White Oak.

From: Paul Gyamfi - WPDBA
To: Estes, Liz; Davis, Jessica; Shelly Jones - WPDBA
Subject: Fwd: FDA White Oak HQ
Date: Tuesday, April 10, 2018 10:27:17 AM
Attachments: image001.png

FDA DEIS Comment

Paul Gyamfi
Senior NEPA Compliance Specialist
General Services Administration
National Capital Region
Public Buildings Services
Office of Planning and Design Quality
301 7th Street, SW
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Washington, DC 20407
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---------- Forwarded message ----------
From: **Huang, Ellen (CBER)** <Ellen.Huang@fda.hhs.gov>
Date: Mon, Apr 9, 2018 at 12:52 PM
Subject: FDA White Oak HQ
To: "paul.gyamfi@gsa.gov" <paul.gyamfi@gsa.gov>

Dear Mr. Gyamfi,

I have been made aware there is a planned expansion of the White Oak campus to consolidate FDA HQ to a single location. This consolidation would increase the existing population from about 10,400 to approximately 18,000. At this time, a Draft Environmental Impact Statement (DEIS) has been prepared. The FDA community was not informed or involved in development of this plan (at least my colleagues and I never heard about it). This consolidated campus could have major impacts on our community and campus, traffic (on and off campus), transportation, commuting, parking and ecological resources. Comment on the planned DEIS period closes on Monday, April 16. The final EIS is scheduled for completion in Fall/Winter 2018. I believe the FDA community should have been involved from the early planning stages for this project and that the GSA should have provided several briefings to the employees of FDA at WO on this project. Please provide an opportunity for FDA employee involvement before the EIS process proceeds any further.

#1

Regards,

Ellen Huang

Lead Consumer Safety Officer

Manufacturing Review Branch 2

Division of Manufacturing and Product Quality
Office of Compliance and Biologics Quality

Center for Biologics Evaluation and Research
U.S. Food and Drug Administration

10903 New Hampshire Avenue, WO71-6045

Silver Spring, MD 20993
Tel: 240.402.9593
ellen.huang@fda.hhs.gov

Email from Ellen Huang, April 9, 2018

Comment 1: GSA conducted public scoping for the MP EIS. The public scoping period was from August 17, 2017 to September 25, 2017. A public scoping meeting was held on September 12, 2017. The scoping period was announced through a Notice of Intent in the Federal Register on August 17, 2017 and in the Washington Post and the Prince George's and Montgomery Sentinels. In addition, the draft EIS was available for public review and comment from March 2, 2018 through April 16, 2018 with a public hearing being held on March 22, 2018. A federal register notice was issued on March 2, 2018 and a notice was also placed in the Washington Post and the Prince George's and Montgomery Sentinels.

From: Paul Gyamfi - WPDBA
To: Estes, Liz; Shelly Jones - WPDBA; Davis, Jessica
Subject: Fwd: Comments on White Oak DEIS
Date: Tuesday, April 17, 2018 11:54:50 AM

FDA EIS Comment from FDA employee

Paul Gyamfi
Senior NEPA Compliance Specialist
General Services Administration
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---------- Forwarded message ----------
From: **Laurenson, James** <James.Laurenson@fda.hhs.gov>
Date: Tue, Apr 17, 2018 at 11:51 AM
Subject: Comments on White Oak DEIS
To: "paul.gyamfi@gsa.gov" <paul.gyamfi@gsa.gov>

Dear Mr. Gyamfi,

Apologies, I had thought I sent this but found it in draft! Hopefully you will still consider, especially given my first point below about adequate communications to onsite employees about this expansion plan and EIS.

I'm an FDA employee at White Oak, a member of the volunteer Green Team, and someone who is deeply concerned about our environment and the role that the federal government plays in protecting it.

First, I was very surprised that no employees were informed about this EIS process, especially given we're among the most impacted! Sounds like a failure to follow the NEPA rules. #1

Second, is that I don't see any options that put buildings closer to NH Ave., thus using land #2

that's already low quality given the golf course that had been there. #2 Cont.

Third, having buildings near NH Ave. facilitates commuters, which can have a significant impact on the environment by increasing the number of commuters because of proximity to mass transit stations. #3

Fourth, having a commuter depot on the far edge of campus would reduce the number of users, and thus impact the environment. As a frequent user of the shuttle buses and metro buses, I can attest to how such a location would affect people's decision to mass commute or not. #4

Finally, I have read and totally agree with the comments of Dr. Bernard Berne.

Thank you,

Jim Laurenson

FDA White Oak

James Laurenson, April 17, 2018

Comment 1: GSA conducted public scoping for the MP EIS. The public scoping period was from August 17, 2017 to September 25, 2017. A public scoping meeting was held on September 12, 2017. The scoping period was announced through a Notice of Intent in the Federal Register on August 17, 2017 and in the Washington Post and the Prince George's and Montgomery Sentinels. In addition, the draft EIS was available for public review and comment from March 2, 2018 through April 16, 2018 with a public hearing being held on March 22, 2018. A federal register notice was issued on March 2, 2018 and a notice was also placed in the Washington Post and the Prince George's and Montgomery Sentinels.

Comment 2: The land immediately adjacent to New Hampshire Avenue and Building One has always been considered a buffer and is now documented as a historic buffer. In addition there is a stream valley buffer that consumes a vast percentage of the area and much of the that area was reforested as part of the mitigation for the new bridge across Paint Branch Creek.

Comment 3: There are no perceptible impacts with commuter habits where the buildings are proposed. The location would divide the traffic between New Hampshire Avenue, and FDA Boulevard

Comment 4: Comment noted

U.S. GENERAL SERVICES ADMINISTRATION

PUBLIC HEARING

- - - - - - - - - - - - - - - -X

IN THE MATTER OF: :

U.S. FOOD AND DRUG :

ADMINISTRATION MASTER PLAN :

AT THE FEDERAL RESEARCH :

CENTER AT WHITE OAK :

DRAFT ENVIRONMENTAL IMPACT :

STATEMENT :

- - - - - - - - - - - - - - - -X

Thursday, March 22, 2018 6:45 p.m.

Whereupon, the above referenced matter came on for a Public Hearing at the CHI Centers, 10501 New Hampshire Avenue, Silver Spring, Maryland, 20903.

P R O C E E D I N G S

[TIME: 6:45 P.M.]

MS. LIZ ESTES: Good evening and welcome to the U.S. General Services Administration Public Hearing on the Draft Environmental Impact Statement. For the U.S. Food and Drug Administration Master Plan at the Federal Research Center at White Oaks. My name is Liz Estes and I'm with Stantec Consulting Services and we are working for GSA doing the environmental compliance.

This public hearing will provide you the opportunity to comment on the Draft EIS and the Section 106 Historic Preservation considerations for the FDA Headquarters Master Plan. Copies of the Draft EIS are available at the website shown on the board to your right and a hard copy is available for public review at both the Silver Spring and Beltsville libraries. This hearing provides a venue for raising environmental issues you believe were not addressed, or were not

adequately addressed, in the Draft EIS.

We want to remind you that comments expressing an opinion about the project itself are not considered a substantive comment relative to the potential environmental impacts, and therefore, would not be addressed in the final EIS. There are several different avenues for you to submit your comments. To provide written comments, you may use the comment form that is available at the sign-in table and either leave it here tonight or you can mail it, or e-mail them to GSA at the address listed on the comment form. All the comments on the Draft EIS are due to GSA by April 16th. Written comments must be postmarked by April 16th to be accepted.

You may also provide oral comments here this evening. When you give your comment, please make sure to state your name and spell it clearly into the microphone as your comments are being transcribed by a stenographer for the record.

Please note that your comments will be recorded for inclusion in the final Environmental Impact Statement and will not be responded to this evening. This

hearing will end at 8:30 or after the last commenter. Anyone who still wishes to offer oral comments privately after that time may speak to the court reporter. He will be available up to 30 minutes after the last commenter.

And for a couple of housekeeping items, the bathrooms are to your left out this door and just be careful when you go out there because there are some dripping ceilings, so we don't want you to get hurt. And you go out the door and go to the left down the hallway.

And now, I'd like to turn this over to Dawud Abdur-Rahman of GSA.

MR. DAWUD ABDUR-RAHMAN: Good evening, everyone. My name is Dawud Abdur-Rahman and I am the GSA Project Executive for the GSA Master Plan. With me presenting tonight are Shelly Jones and Paul Gyamfi, both of GSA. Also presenting this evening, you've already met, is Liz Estes from Stantec Consulting Services, Incorporated, our environmental consultant. Also in attendance this evening are additional GSA representatives as well as team members from our

cooperating agency, the Food and Drug Administration. Members from GBR, our architect and engineering consultant team, are also in attendance. I would also like to acknowledge that there are several public officials in the audience tonight. If I missed anyone, please let me know.

In carrying out our Environmental Socioeconomic Analysis responsibility, GSA is committed to ensuring that we provide proper consideration to the quality of the natural and human environment. This hearing is an important opportunity for both as elective representatives or as individual citizens, to provide your comments on the Draft EIS or the FDA Master Plan at the Federal Research Center. We appreciate your participation this evening.

Paul Gyamfi, the GSA environmental Compliance Specialist for the FDA Master Plan will now present the NEPA overview and process.

MR. PAUL GYAMFI: Thank you, Dawud. Before beginning the public comment portion of tonight's agenda we want to provide some background information on the project. We will describe the processes for

complying with the National Environmental Policy Act of 1969, commonly referred to as NEPA and Section 106 of the National Historic Preservation Act. We will explain the action proposed by GSA and its proposal's need. We will then give a brief overview of the proposed alternatives for the FDA Master Plan and, finally, we will provide an overview of the potential environmental and socioeconomic impacts from these alternatives. At the conclusion of our presentation, we will review how you can make comments on the Draft EIS and then open up the floor to allow you to make oral comments this evening.

In order to guide further development for the FDA and FRC, GSA is preparing a Master Plan. The compliance for the Master Plan, EIS and Section 106 processes are being prepared concurrently. In addition, a Draft Master Plan, along with a Draft Transportation Management Plan, have been submitted to the National Capital Planning Commission and other local and regional agencies for their review and comments.

GSA, with input from FDA, as a cooperating agency,

has prepared a Draft EIS in accordance with the requirements of NEPA. NEPA is the nation's legislative channel for protection of the environment and provides for the consideration of environmental issues and federal agencies' planning and decision-making. NEPA requires GSA to prepare an EIS, because when a proposed action may significantly impact the quality of the natural and human environments and EIS informs agency decision makers and the public about the potential environmental impacts of implementing their alternatives for the proposed action including the no Action Alternative.

The regulations that implement NEPA outline three types of impacts. They were evaluated for each of the Alternatives in the Draft EIS. They are direct, indirect, and cumulative. Direct impacts occur at the same time and place as the proposed action. Indirect impacts occur later in time, or after remove or further removed in time but still reasonably foreseeable. Cumulative impacts are the incremental impact of the action when added to other past, present and reasonably foreseeable future actions, regardless of what agency

or entity undertakes these other actions.

We are now on Step 4 of the NEPA process. This process began when the GSA published a Notice of Intent to Prepare an EIS in the Federal * on August 11, 2017. Since then, GSA, with influence from the FDA as a cooperating agency, has collected and analyzed data and continued consultation with stakeholders and other government agencies in order to develop the Draft EIS. The Draft EIS was issued to the public and to regulatory agencies for public comments beginning March 2nd, 2018. The 45-day public comment period will end on April 16, 2018. By the Fall of this year, GSA plans to release the final EIS to the public for a period of 30 days before making a final decision, at which point GSA will publish a Record of Decision. A Record of Decision is a public document that contains a statement of the decision made among alternatives considered and the applicable monetary and enforcement plan for all mitigations adopted for the project.

Section 106 of the National Historic Preservation Act of 1966 requires that Federal agencies take into account the effect of their actions on any district,

site, building, structure or object listed in, or eligible for inclusion in, the National Register of Historic Places. Section 106 review showed that preservation values are factored into federal agency planning and decisions. Concurrent with the NEPA process, GSA has initiated consultation under Section 106. Section 106 required that GSA provided the public, agencies, and other interested parties, their opportunity to comment on GSA actions impacting historic resources. GSA is integrating the public involvement processes for Section 106 and NEPA.

Though comments on the Draft EIS are due by April 16th, comments on the Section 106 process will be accepted throughout GSA's consultation with Maryland Historical Trust. GSA is kindly consulting with the Advisory Council on Historic Preservation, the Maryland State Historic Preservation Office, known at the Maryland Historical Trust, and other consulting parties.

GSA, along with the Advisory Council, Maryland Historical Trust, and other consulting parties, will develop a programmatic agreement as required. The

programmatic agreement will outline a series of procedures and project requirements that will avoid, minimize and mitigate potential adverse impacts of the proposed action on cultural resources. Within the regulatory framework described in the last few slides, GSA is proposing to implement a Master Plan to further consult with FDA's Headquarters facilities at the Federal Research Center and to provide a framework for development at the Federal Research Center to accommodate approximately 18,000 FDA employees and support staff. The purpose of the proposed action is to provide a Master Plan for the FDA campus at the FRC to accommodate growth. The Master Plan will provide a framework for development at the FRC to accommodate 18,000 FDA employees and support staff. The master plan will steer the planning, design and construction of new buildings, improvement to roadways, utilities and other infrastructure, and the protection of natural areas. Since the 2006 master plan was completed additional authorities have been added to and original authorities have expanded the FDA mission. These include the FDA Reauthorization Act of 2017 which Congress passed on August 3, 2017. This new

legislation reauthorized the user fee programs necessary for continued support of the agency's premarket evaluation of prescription drugs, medical devices, generic drugs and bio-similar products. Due to this congressional mandate, the FDA is projecting that there will need to be an increase in employees and campus staff at the FDA campus. Therefore, GSA's proposing a Master Plan to accommodate future growth and further consolidate FDA operations. Currently FDA has 10,987 personnel assigned to the FDA campus with a peak daily population of 7,793. The projected growth for FDA campus at the FRC is approximately 6,546 additional employees, which included funded vacancies, consolidation of existing FDA employees currently in leased space in suburban Maryland to include Montgomery County and Prince George's County GSA 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 the increase in personnel, office space

at FRC needs to be expanded. Infrastructure improvements are needed to serve the increase in office space and campus population.

In Fiscal year 2016, Congress provided funding for FDA to complete a feasibility study and a master plan for land inside and contiguous to the White Oak campus to address its expanded work force and the facilities needed to accommodate them. Shelly Jones, GSA's project manager for the FDA master plan will now present the Alternatives that have been analyzed in the Draft EIS.

MS. SHELLY JONES: Thank you Paul. Under the Action Alternatives, the number of FDA employees and support staff at the FDA campus would increase to approximately 18,000. The proposed action would add up to an additional 1,191,309 gross square feet of office space and 557,525 gross square feet of special, or shared use, space to support FDA's mission for a total of up to 977,671 gross square feet. To accommodate the proposed growth, 7436 parking spaces are being proposed. Additional new parking spaces include replacement of the existing 2544 parking spaces that

would be displaced by new buildings. The parking equates to a parking ratio of 1:1.8 or approximately one parking space for every 1.8 persons. The proposed parking would increase to a total of approximately 11,709 parking spaces with 10,094 spaces dedicated to employees and support staff and 1615 spaces for visitors. A reconfigured East Loop Road would circle around the new office buildings proposed at the east side of the FDA campus and would connect with Blandy Road. At Blandy Road and FDA Boulevard, a new traffic circle would be constructed that will connect it with the southeast Loop Road. The southeast Loop Road would circle around the Southeast parking garage and connect to the existing Southeast Loop Road that would be reconfigured for the connection.

Under each of the Action Alternatives, a distribution center would be constructed either under the new plaza connecting the new development on the east with the existing development or adjacent to the northeast parking garage. A truck screening facility would be constructed at the entrance to the FDA Campus on Michelson Road and the new transit center would be

located on the existing northwest service lot. GSA has proposed three alternatives for accommodating the additional FDA campus and campus support on the FDA campus.

Alternative A: With Alternative A, the buildings would be in the range of existing buildings and the planning principle of buildings defining a series of courtyard spaces and the tradition of great university campuses would be maintained. The buildings would not be visible from New Hampshire Avenue. The new office buildings would be placed at the eastern end of the extended plaza to facilitate a walkable campus. Alternative A includes the following: The addition of 1, 589,161 gross square feet of total office spaces, shared use spaces and special use spaces; five new office buildings up to ten stories tall; three to four 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 with the new buildings on the eastern end of the campus; a conference center placed on the northwest quadrant of

the existing main campus; a distribution center; a truck screening facility; a transit center; a reconfigured East Loop Road; a new traffic circle to the east to connect East Loop Road and the Southeast Loop Road and reconfigured Southeast East Loop Road.

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

Alternative B would also consist of the following: The addition of 1, 748,834 gross square feet of total office buildings, shared use space and special space; four new office buildings up to 20 stories tall; three to four 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; a truck screening facility; a transit center; a

reconfigured East Loop Road; a new traffic circle to connect East Loop Road with Southeast Loop Road and reconfigured Southeast Loop Road.

Alternative C: With Alternative C, two 14-story office buildings would be placed on the eastern end of the FDA campus; the high-rise office buildings would be visible from New Hampshire Avenue. Additional mid-rise buildings would also be placed at the eastern end of the commons and an extended plaza would be created to facilitate a walkable campus.

Alternative C would also consist of the following: The addition of 1, 573,124 gross square feet of total office buildings, shared use space and special spaces; five new office buildings up to 14 stories tall; three to four 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 on the existing main campus; a free-standing dining facility placed on the plaza; a distribution center; truck screening facility; a transit center; a reconfigured East Loop Road; a new traffic circle to connect East Loop Road with Southeast Loop Road and

reconfigured Southeast Loop Road.

I will now turn the presentation over to Liz Estes with Stantec who will provide you with a discussion of the impacts of each of the Alternatives.

MS. ESTES: Each of the Alternatives studied in detail in the Draft EIS would result in impacts to the human environment. There would be impacts to the natural environment, impacts to the socioeconomic environment surrounding the campus, impacts to cultural resources and impacts to public health, safety and traffic.

Before we move into discussing impacts, we want to explain how impacts are assessed for each Alternative. The impacts for each of the Alternatives are assessed by comparing conditions under each Alternative to the conditions under the No-Action Alternative, which is used as a baseline.

Under the No-Action Alternative, FDA would continue its current operations at the FRC. The number of employees and support staff would not increase and would remain at approximately 10,987 personnel with a current peak daily population of 7793. The additional

employees needed to conduct the complex and comprehensive reviews mandated by Congress would need to be located in other government-owned or leased space in the Washington D.C. Metropolitan area.

The Draft EIS characterizes impacts based on the level of their intensity, type, duration and context. Intensity refers to the severity of the impact. The Draft EIS uses four intensity thresholds: Negligible, minor, moderate and major. Major impacts are those considered significant under NEPA regulations. A finding of significance allows decision makers to focus mitigation and make an informed decision.

Beneficial and adverse impacts that are measurable but not major, are either negligible, where the impact is localized and not measurable at the lowest level of detection; minor, where the impact is localized and light, but detectable; and moderate, where the impact is readily apparent and appreciable.

The type of impact describes the beneficial or adverse nature of the impact. The duration of an impact considers how long the impacts are expected to last. Short-term impacts are defined as those

associated with the construction period or those lasting less than one year, while long-term impacts are defined as those occurring throughout the operational period of the consolidated headquarters campus.

Lastly, context refers to the spatial and social scale over which impacts would occur. The Draft EIS evaluates impacts at the local and regional level as appropriate for each resource topic. To assess the potential environmental impacts under each alternative, we collected and analyzed the information on a wide range of resource categories which will be the focus of tonight's discussion. The list of the resource categories on this slide have been determined that they will cause little to no significant impact. Therefore, they were dismissed from detailed analysis within the Draft EIS. The rationale for their dismissal can be found at the beginning of Chapter 3 in the Draft EIS. Natural resources that were studied in detail include soil, topography and geology, surface water and wetlands, vegetation and wildlife.

The No-Action Alternative would not result in construction of new buildings; therefore, no changes to

topography and geology would occur and soils would not be impacted. Alternative A would result in major, long-term, direct, adverse impacts from the clearing, grading and excavation of 35-1/2 acres for new building areas and the disturbance of 0.8 acres of steep slopes.

Alternatives B and C would also result in major long-term direct adverse impacts from the clearing, grading and excavation of 36.6 acres for new buildings and the disturbance of 1.3 acres and 1.2 acres of steep slopes respectively.

All of the Action Alternatives would result in minor, short-term, indirect, adverse impacts from soil erosion during construction. Under the No-Action Alternative, no significant direct impact to surface water or wetlands would occur. GSA would provide appropriate storm water management for non-compliant surface parking lots resulting in a minor, long-term, beneficial impact to streams and wetlands. No stream valley buffers would be impacted.

Alternative A would result in 448 linear feet of permanent stream impact and 0.02 acres of permanent wetland impacts, which would have a major, long-term,

adverse impact to streams and stream valley buffers and wetlands.

As compared to Alternative A, alternatives B and C would result in 270 linear feet of permanent stream impact and would not have permanent impact to wetlands. The long-term impacts under Alternatives B and C would be moderate and adverse. Under alternative A there would be adverse impacts due to increased runoff from an additional 8.2 acres of impervious cover from proposed buildings, roads and parking structures, while alternatives B and C would add an additional 6.6 acres of impervious cover.

Under each of the Action Alternatives, the adverse impacts would be minor to moderate, indirect, and long-term. During construction, clearing, grading and road-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 would be minimized using best management practices. Adjustments in GSA would provide storm water treatment facilities for non-compliant surface parking lots in accordance with

Maryland Department of Environment requirements, which may result in impacts to landscaped areas and maintained lawns under the No-Action Alternative. Because these areas consist of maintained urban vegetation, the impact to vegetation would be negligible.

Moderate long-term direct adverse impacts to vegetation would occur due to clearing of 10.3 acres of forest under Alternative A, 7.9 acres under Alternative B, and 7.7 acres under Alternative C.

In addition, approximately 3.2 acres of maintained law would be removed under all of the Action Alternatives.

Under Alternative A only, approximately 0.2 acres of wetland vegetation would be impacted. Habitat fragmentation would also occur that would expose more forest areas to the potential establishment of invasive species.

In summary, the removal of forest, wetland vegetation and maintained lawns would result in long-term, moderate, adverse impacts to vegetation under all of the Action Alternatives. There would also be minor

long-term indirect adverse impacts to vegetation due to increased airborne pollutants during construction, clearing, grading and road and building debris may result in temporary impacts to vegetation due the preparation of temporary staging and laydown areas. The impacts would be minimized using best management practices.

The forested portions of the study area provide the majority of the habitat for terrestrial wildlife. These areas would not be impacted under the no Action Alternative because there would be no new construction. As with the impacts to vegetation, the removal of forest would result in a loss of habitat for terrestrial wildlife within the study area.

Fragmentation of the forest would also affect movement of wildlife and increase potential conflicts with humans. However, no particular species which are currently utilizing the site are likely to be eliminated as a result of any of the Action Alternatives.

Increased impervious surface area would increase runoff into the streams which could impact the habitat

for aquatic wildlife and potential erosion and sedimentation from construction would add to the degradation of aquatic habitat. Therefore, all the alternatives would result in long-term negligible to minor adverse impacts to wildlife.

The expansion of the central utility plant and the traffic that has been generated by the FDA campus would continue to have minor long-term direct adverse impacts to air quality; however, the FDA campus is in conformance with the Washington Metropolitan Region State Implementation Plan. In order to determine the impacts of the proposed master plan on air quality, GSA has conducted an air quality analysis. Based upon this analysis, it was determined that alternatives A, B and C would have minor long-term direct adverse impacts from mobile sources such as cars and buses due to additional traffic on the local roadways. There would be negligible long-term, direct, adverse impact from stationary sources such as the central utility plant from the operation of additional buildings and minor, short-term, indirect, adverse impacts during construction due to fugitive dust and emissions from

construction equipment. All Action Alternatives would also conform to the Washington Metropolitan Regions State Implementation Plan.

In addition, GSA also studied greenhouse gas emissions. Currently, the FDA campus does not contribute significantly to greenhouse gas emissions. However, implementation of Alternatives A, B and C would have a minor, long-term, direct, adverse impacts due to a slight increase in stationary and mobile source greenhouse gas emissions. Minor, short-term, direct, adverse impacts would occur during construction due to greenhouse gas emissions from construction equipment.

Socioeconomic topics that were analyzed in further detail in the Draft EIS includes land use planning and zoning, community facilities and services, economy, employment and safety and security. Consistent with the federal elements of the comprehensive plan, the current Master Plan on the FDA campus encourages efficiency, higher productivity and collaboration. In addition, the current Transportation Management Plan encourages employees to use alternative means of

transportation to commute to the campus. Additionally, buildings on the FDA campus operate in an energy-efficient and sustainable manner meeting LEED Gold certification and have Net Zero energy and water usage. However, the No-Action Alternative is not fully consistent with some of the related federal elements of the comprehensive plan because GSA would continue to lease facilities for FDA that are not located in the immediate vicinity of the FDA campus. As programs are expanded and new employees are hired, additional leased space would be needed. This would not further improve efficiency, alleviate congestion or improve air quality which are elements of the comprehensive plan. Therefore, there would be a minor, long-term, adverse impact to land use planning. Currently the FDA campus is consistent with the White Oak Master Plan and the White Oak Science Gateway master plan.

With the Action Alternatives, the consolidated expansion of the FDA campus would encourage efficiency, higher productivity and collaboration that is consistent with the federal elements of the comprehensive plan. A transportation management plan

would be developed that would encourage alternative means of transportation which is consistent with the transportation element of the federal comprehensive plan and the Action Alternatives would be constructed and operated in an energy-efficient manner which is consistent with the environmental elements. The Action Alternatives would also be consistent with the White Oak Science Gateway master plan because the expansion would attract and support new businesses to the area. The Action Alternatives would also be consistent with the goals of the Prince George's County Sub-region 1 Plan for Green Design, sustainable development, and attracting new employment opportunities.

Land use within the project area would change which would result in negligible, long-term adverse impacts to land use planning. Currently, no change in community facilities and services would occur. There would not be an increase in employees on the campus and, therefore, there would not be an increase in demand for community services such as schools in Montgomery and Prince George's Counties, and parkland and park operations are currently not affected.

All of the Action Alternatives would have minor, long-term, indirect, adverse impacts to schools due to potential relocation of FDA employees because they may move closer to the FDA campus. Minor, long-term, indirect impacts to parks, recreation or open space would occur due to increased usage by FDA employees. However, it is expected that the potential increased usage of parks, recreation facilities and open space would not exceed the availability of the resources in this area.

The No-Action Alternative would not see an increased population of employees at the FDA campus; therefore, there would be no significant impact on employment within the area, whereas, all of the Action Alternatives would see an increase in employees at the FDA campus. The Action Alternatives would therefore result in long-term, minor, indirect and direct beneficial impacts on employment.

During construction, temporary employment of construction workers would also result in short-term, minor, beneficial impacts on employment.

Under the No-Action Alternative no property taxes

would be received from the FRC because it is under federal ownership and is not subject to property taxes. Employees would continue to add revenue in the form of sales tax from sales at local businesses and services. Therefore, the No-Action Alternative would continue to have short-term, minor, beneficial impacts to taxes and revenue.

As with the No-Action Alternative, improvements on the FDA campus under all of the Action Alternatives would not provide additional property tax revenue. The increased workforce may add revenue in the forms of sales tax from the potential increase in sales at local businesses and retail resulting in long-term, moderate, beneficial impacts to tax revenue. Secondary job related to the increase in economy stimulated by the implementation of the Master Plan may also be created.

Additionally, retail services and businesses may see an increase in employment from the proposed action through a multiplier effect yielding additional sales and income tax revenues for the local and state governments.

With the No-Action Alternative, no change in the

volume of calls for police, fire or emergency medical services are anticipated. Montgomery County Fire and Rescue Service plans to construct a new fire station northeast of the Federal Research Center to address the anticipated increased call load from the planned Viva White Oak development and other area developments. At a minimum, the new station would have a two-person EMS transport unit and a four-person paramedic engine.

Current security measures and procedures at the FDA campus would continue. Access to the FRC would continue to be restricted to Federal employees and approved visitors. The existing truck screening facility would remain at its current location and would not provide adequate space for truck turn-around. Security deficiencies near the laboratory buildings, loading docks, and the Central Utility Plant would remain unaddressed. This would result in minor, long-term, adverse impacts to the safety and security of visitors and employees on the FDA Campus.

While the Action Alternatives would have minor, long-term, direct, adverse impacts to local police, fire, and emergency service stations in Montgomery

County due to an increase of 75 fire/rescue/Emergency Medical Services incidents per year and negligible, short-term, direct, adverse impacts would occur during construction due to potential construction site hazards. The proposed Montgomery County Fire Station northeast of the FRC would help to handle any increased calls for fire and EMS service. A new centralized Visitor and Transit Center would provide a single point of entry for all visitors and would streamline visitor security screening. A centralized Truck Screening Facility would allow for trucks and delivery vehicles to be screened prior to entering the FDA Campus. These new facilities would result in moderate, long-term, direct, beneficial impacts.

Cultural resources consist of historic structures, cultural landscapes and archaeology. No new construction would take place under the No-Action Alternative. Therefore, there would be no significant adverse impacts to known or potential historic properties, archaeological resources, or other cultural resources.

The placement of the Conference Center and the

Northwest Parking Garage would not affect the remaining historic resources on the FDA Campus which are Buildings 1 and 100, the flagpole, and the redesigned circle in front of Building 1 with the Action Alternatives. The mid-rise buildings proposed under Alternative A would be of similar scale to the existing buildings at the FDA Campus. However, the high-rise buildings under Alternatives B and C would be taller than the existing buildings at the FDA Campus.

Because the high-rises are not consistent with the height and massing of the historic buildings remaining on the FDA campus, and the FDA campus outlined within the compatibility standards established in the 2002 Memorandum of Agreement, their construction would result in an adverse effect to the broad view of the façade of Building 1 under Section 106 of the National Historic Preservation Act.

Archaeological resources may be impacted under the Action Alternatives due to the construction of the East Parking Garage.

A detailed transportation analysis was undertaken to determine the effects of the local transportation

network and associated traffic levels. Under the No-Action Alternative, current development in the area would add additional delay and queuing at 11 intersections. These intersections would operate at an overall level of service E or F, resulting in moderate, long-term, adverse impact to local roadways. There would be no significant impacts to public transit, bike, or pedestrian services. THe increase in employees under the Action Alternatives, however, would have moderate, long-term, direct, adverse impacts to traffic volumes which would cause additional delays and queuing at multiple intersections. This would require improvements to be made to several of these intersections. There would be no significant impacts to existing transit services, new sidewalks, secure bike parking, locker room and shower facilities, and bike repair stations at the FDA campus would result in moderate, long-term, direct, beneficial impacts to bicyclists and pedestrians.

There would be no significant impacts to utilities or waste management under the No-Action Alternative. However, the Action Alternatives would have minor,

long-term, direct, adverse impacts to water service due to increased demand. The additional sewer flow expected under the proposed 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, would likely exacerbate existing sewer overflows downstream in the Paint Branch Sewer system. The potential to contribute to offsite sewer overflows represents a long-term, indirect, major, adverse impact to sanitary sewer service. However, by implementing mitigation measures, the major impact to sanitary sewer service would be minimized. There would also be a minor, long-term, direct, adverse impact to electrical service because of an increased demand on the power grid.

The Action Alternatives would have minor, short-term, direct, adverse impacts to waste management due to a temporary increase in construction waste and 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 consolidated Distribution

Center would consolidate the waste streams of most of the existing and proposed campus buildings, which would provide a centralized, efficient system for trash and recycling, sorting, storage, and removal resulting in long-term, beneficial impacts.

Now on to the EIS schedule. As previously stated, we are in the midst of a 45-day public comment period for the Draft EIS, which will end, as previously stated, on April 16th. Following that time, GSA and its consultants will prepare the final EIS and issue it for a 30-day review period. This will take place in the Fall of 2018. A Record of Decision will be signed that will document the government's final decision on which alternative they will move forward for the FDA. A final Master Plan and Transportation Management Plan will be submitted to NCPC for their review and approval during the Fall of 2018.

As I previously discussed, there are several ways to comment on the Draft EIS and Section 106 Historic Preservation process. Copies of the Draft EIS are available at the website shown on the next screen and a hard copy, again, are available at both the Silver

Spring and the Beltsville libraries. This hearing provides you a venue for raising environmental issues you believe were not addressed, and were not adequately addressed in the Draft EIS. Again, we want to remind you that your comments expressing an opinion about the project itself are not considered a substantive comment relative to potential environmental impacts and, therefore, would not be addressed in the final EIS.

There are several different avenues for you to submit your comments. You can provide written comments, you can use the comment form that is available at the sign-in table and either leave it here tonight or you can mail it or e-mail it. All the comments on the Draft EIS are due to GSA by April 16th and written comments must be postmarked by April 16th to be considered. You may also provide oral comments here this evening after I finish speaking.

We will now open the floor to those of you who would like to make formal comments.

MS. JESSICA DAVIS: We had one person sign up, Daniel Wilhelm.

MS. ESTES: Okay.

MR. DANIEL WILHELM: Actually, I have written comments. Who do I give those things to?

MR. ABDUR-RAHMAN: I'll take it.

MR. WILHELM: I'll also e-mail it. Anyway, I'm going to – I don't know if you have a time limit but I'll try to keep this short. On the Alternatives, I've got my comment on two things: One is the Alternatives themselves and the other is transportation. Most of my comments are transportation-related. My comments on the Alternatives is mainly visual and for the 20-story building, to me it stands out above the existing buildings viewed from New Hampshire Avenue and I don't like that so I would like to have it lower. Basically, Alternative C is probably the best but if you could lower the 14-story buildings a few stories so it's not visible at all from New Hampshire Avenue, that would be great.

The transportation: If you look at the EIS, it looks like things are really bad, and the county, on the White Oak Science Gateway Master Plan know if the development is built that's in the plan things are going to get bad, you know, E and F-level congestion,

so that's well known but your EIS assumes no improvements will be made and all the improvements, all the development will occur.

So, there's a number of things that I have in my testimony and I'll leave that with you, but part of it is the data that was used by your consultant, he got that from the county – or actually – well, Sabra Wang -- and that included almost 1.5 million square feet on the GSA property, so there's some double counting going on there, so it's not as bad as it says it is. There's also a lot of things happening in the eastern part of the county relative to transportation and I'll lay those things out. Part of it is the local development. There's five different types of improvements – or, improvements occur five different ways. One is subdivision approvals that were done before January 2017, and this includes the Adventist Hospital, or now the White Oak Medical Center. They're making some improvements. And then there's another development, White Oak Towns that are making improvements. Viva White Oak, once Jonathan Genn gets his stuff done, there's lots of improvements slated there. The county

has already appropriated forty million dollars for their share and Jonathan's got to pay for the rest of the improvements on FDA Boulevard, Tech – or not Tech Road – Industrial Boulevard, and what they call B5.

BRT is coming on 29, actually as of Tuesday this week the council looking at their capital improvement program it's not final until May, until they look at all of the projects and have to reconcile and make sure they have enough money for everything they want, but for BRT and 29, in my book it's certain it's going to go through, then it will be operational in a 2020 time frame. They also have, on March 6th, approved a change in scope of the existing study and looked at dedicated lanes from Tech Road south, which is an ongoing study. There's going to be a study for a New Hampshire Avenue BRT which will directly affect and benefit FDA, so there's a lot of things happening, so things are not going to be as bad as the EIS says. These things are coming whether or not you go forward. We want you to go forward and come here.

There's also the local area transportation improvement program where the county's put a process in

place to get money from the developers – not GSA, but the other developers – you're welcome to kick in money -- and make improvements to the area and the county can either make it or the developers can make those improvements and I'm hoping the developers will make the improvements so they'll get there in a timely fashion and the county DOT would allow that as well, because they can do it faster and probably cheaper.

The other thing I had some comments about local buses, your shuttle buses going outside the site to the BRT stations at Lockwood. You know, when that happens there, and the BRT stations on the north side as well. So, anyway, we'll give you the details and you can study that. Thank you.

MS. ESTES: Thank you. Did anybody else want to provide any comments tonight? If you didn't feel like giving comments you can also provide oral comments after we finish up here. I also wanted to let everyone know, we have several copies of the presentation that was presented tonight that you can take with you and we have display boards around that show – over here – the alternatives if you want to take a closer look at them.

Before you leave, we welcome you to sign up for the project's mailing list at the sign-in table if you haven't already done so. This will conclude our public hearing tonight. The court reporter is available for those who would like to provide oral comments privately. Please make sure to have a safe trip home. Thank you.

Off the Record at 7:38 p.m.

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