



# 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

Final Environmental Impact Statement: Appendices A - F

August 2018

Prepared by:



In cooperation with:





# APPENDIX A – Scoping Comments



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

September 25, 2017

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: Scoping for an Environmental Impact Statement for the proposed Master Plan of the FDA Headquarters Consolidation at the Federal Research Center at White Oak-Silver Spring, MD.

Dear Mr. Gyamfi:

In accordance with the National Environmental Policy Act (NEPA) of 1969 and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency (EPA) is responding to the General Services Administration's (GSA) request for scoping suggestions on the planned Environmental Impact Statement (EIS) for the proposed U. S. Food and Drug Administration (FDA) Headquarters consolidation at the Federal Research Center at White Oak in Silver Spring, MD. EPA has included the following general comments for your consideration in the development of the EIS (enclosure).

The EIS is planned to evaluate the potential consequences on the human and natural environment resulting from increased FDA employee population. In 2009, GSA completed a Supplemental EIS that analyzed the impacts of increasing the number of employees at the FDA HQ from 7,720 to 8,889 in order to conduct the complex and comprehensive reviews mandated by new legislation. To accommodate future growth and further consolidate FDA operations, GSA is preparing this EIS to assess the impacts of a significant employee population increase of up to approximately 18,000 employees over a period of 15 years.

The EIS should include the purpose and need, alternatives analyzed, avoidance and minimization of resources, cumulative impacts, and community effects of the proposed project. In each alternatives analysis, community impacts from the project and its construction should be evaluated and minimized. We recommend this include noise, light, and potential traffic impacts during construction and as a result of the final project. Natural, biological, and cultural resources should also be considered, as well as safety and environmental hazards.

## **Technical Comments**

FDA Headquarters Consolidation-Federal Research Center at White Oak  
Silver Spring, MD

### **Purpose and Need**

Since the range of alternatives evaluated is defined by the purpose and need for the project, it is important that the purpose and need be clearly identified in the Environmental Impact Statement (EIS). The purpose or objective of the proposal should be defined in relationship to the need for the action. Therefore, the need for the action should identify and describe the underlying problem or deficiency; facts and analyses supporting the problem or deficiency in the particular location at the particular time should be specified; and the context or perspective of the agency mission in relation to the need for action should be stated.

### **Alternatives Analysis**

As described in the regulations for the Council on Environmental Quality (CEQ) (40 CFR §1502.14), the examination and comparison of the alternatives under consideration is the heart of the environmental document. It is through this comparison that the lead agency is able to incorporate agency and public input to make informed decisions with regard to the merits of the project and the advantages and disadvantages of each of the alternatives being studied. Consequently, the CEQ regulations require that the details of each alternative, including the "no action" alternative be clearly presented in a comparative form for easy analysis by the reader. The rationale for the selection of the preferred alternative should be clearly stated in the analysis. For those alternatives that are eliminated from consideration, the reasons for their elimination should be given.

### **Land Use and Applicable Regulation**

It is recommended that the project area be described in detail and quantified, specifying the type and acreage of land impacted as well as a description of the existing buildings on the site including their current and past use. Please discuss any permits required before commencement of the project. This may include a Section 404/Section 10 permit from the Corps of Engineers, state water quality certification, and local construction and zoning permits. In addition to NEPA, other laws, regulations, permits, licenses and Executive Orders may be applicable to the Proposed Action (some are discussed in more detail below). A summary of applicable regulatory requirements and approvals with which the Proposed Action must demonstrate compliance should be discussed in the EIS.

### **ENVIRONMENTAL IMPACTS**

The EIS should examine the potential direct and indirect impacts of the project on the environment. In addition, mitigation measures for any adverse environmental impacts should be described. Areas that mandate individual attention are described below.

Some useful information can be gleaned from on-line tools, such as:

EnviroMapper: <https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system> - The Watershed Assessment, Tracking & Environmental Results System (WATERS) unites water quality information previously available only from several independent and unconnected databases

2025 by the federal government, working closely with state, local, and nongovernmental partners, to protect and restore the health of the Chesapeake Bay watershed. The strategy deepens the federal commitment to the Chesapeake region, with agencies dedicating unprecedented resources, targeting actions where they can have the most impact, ensuring that federal lands and facilities lead by example in environmental stewardship and taking a comprehensive, ecosystem-wide approach to restoration. We recommend GSA discuss in the EIS the project's impact or relation to the goals of the EO.

*Wetlands:* Wetlands present on, or immediately surrounding the site should be delineated according to the 1987 Federal Manual for Identifying and Delineating Jurisdictional Wetlands. Impacts to wetlands should be avoided or minimized whenever possible. The total size of the wetlands should be provided, in addition to the size of the wetland in the study area and size of the direct impact. We recommend that the EIS analyze the size and functional values of all impacted wetlands and develop a mitigation plan for their replacement. Even if wetlands are not present on the site, as applicable, please provide necessary information for any nearby resources, to be able consider secondary effects.

*Stormwater Management/low Impact Development:* Stormwater runoff in urban and developing areas is one of the leading sources of water pollution in the United States. In recognition of this issue, Congress enacted Section 438 of the Energy Independence and Security Act of 2007 (EISA) to require federal agencies to reduce stormwater runoff from federal development projects to protect water resources. EPA published *Technical Guidance on Implementing the Stormwater Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act*.

The intent of Section 438 of the EISA is to require federal agencies to develop and redevelop applicable facilities in a manner that maintains or restores stormwater runoff to the maximum extent technically feasible. Implementation of Section 438 of the EISA can be achieved through the use of the green infrastructure/low impact development (GI/LID); infrastructure tools described in the Technical Guidance ([www.epa.gov/owow/nps/lid/section438](http://www.epa.gov/owow/nps/lid/section438)). For more information on specific GI/LID practices and how they function, visit: [www.epa.gov/greeninfrastructure](http://www.epa.gov/greeninfrastructure) and [www.epa.gov/nps.lid](http://www.epa.gov/nps.lid). The intention of the statute is to maintain or restore site hydrology during the development or redevelopment process. This requirement is intended to ensure that receiving waters are not negatively impacted by changes in runoff temperature, volumes, durations and rates resulting from federal projects. The fundamental principle of the Technical Guidance is to employ systems and practices that use or mimic natural processes to: 1) infiltrate and recharge, 2) evapotranspire, and/or 3) harvest and use precipitation near to where it falls to earth. Implementation of these stormwater performance requirements in EISA Section 438 provides numerous environmental and economic benefits in addition to reducing the volume of stormwater runoff. It is recommended that design incorporate features to minimize runoff and consider potential retrofit for any areas that would benefit from LID.

*Floodplains:* Floodplain encroachments should be evaluated and coordinated with the Federal Emergency Management Agency (FEMA). Federal Executive Order 11988 (Floodplain Management) states, "If an agency has determined to, or proposes to, conduct, support, or allow an action to be located in a floodplain, the agency shall consider alternatives to avoid adverse effects and incompatible development in the floodplains." It is recommended that floodplains be identified and functions preserved to the greatest extent possible.

*Impaired Waters, CWA § 401 Certification. TMDLs:* It is recommended that any potential water resources impact analysis identify designated waterbody use, compliance of the waterbody with applicable water quality standards, and any CWA § 401 Certification issues. The EIS should identify if

## **COMMUNITY IMPACTS**

*Noise:* EPA retains authority to investigate and study noise and its effect, disseminate information to the public regarding noise pollution and its adverse health effects, respond to inquiries on matters related to noise, and evaluate the effectiveness of existing regulations for protecting the public health and welfare, pursuant to the Noise Control Act of 1972 and the Quiet Communities Act of 1978. Noise pollution adversely affects the lives of millions of people. Studies have shown that there are direct links between noise and health. Problems related to Noise Induced Hearing Loss (NIHL) is the most common and often discussed health effect, but research has shown that exposure to constant or high levels of noise can cause additional adverse health effects (including stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity). Please discuss potential noise impacts that may result from the Proposed Action.

*Socioeconomics:* Please discuss the socioeconomic and cultural status of the area, including the number of people, employees and/or jobs impacted as a result of the proposed project. It is recommended that the EIS address the decrease or increase of people/employees/jobs in relation to its effect on tax base, local housing, job markets, schools, utilities, businesses, etc.

*Traffic and Transportation:* The EIS should address traffic and transportation as it relates to the Proposed Action. It may be necessary to provide an evaluation of existing roads specifying existing levels of service at major intersections near the project area as well as accident data. If appropriate, an evaluation of the impacts associated with an increased number of employees should be provided. The EIS should discuss existing and proposed public transportation to the area under consideration and provide estimates of expected usage. It is recommended that traffic projections then be made to show expected conditions for a completed project.

*Environmental Justice:* Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and low-Income Populations*, directs each federal agency to incorporate environmental justice into its mission and activities by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations ...." The Executive Order also explicitly called for the application of equal consideration for Native American programs.

The EIS should identify Environmental Justice (EJ) communities in the study area and discuss potential impacts that the Proposed Action may have on these communities. Maps displaying the defined study area are helpful, as well as maps and data of Census tracts and/or block groups to identify areas with populations of concern. Areas within the proposed action having high minority and low-income populations should be readily identifiable in the data provided, and targeted for meaningful public involvement and outreach. Additionally, the EIS should include the methodology used to conduct EJ assessment and the potential direct, indirect and cumulative impacts (i.e., air, noise, water quality, aesthetics, social, economic, health, and subsistence activities) to EJ populations. To assist in this effort, EPA has developed a new EJ mapping and screening tool called EJSCREEN. It is based on nationally consistent data and an approach that combines environmental and demographic indicators in maps and reports. It can be accessed at: <https://www.epa.gov/ejscreen>. Additionally, please consider referring to "Promising Practices for EJ Methodologies in NEPA Reviews": <https://www.epa.gov/environmental-justice/ej-ivg-promising-practices-ej-methodologies-nepa-reviews>.

in the building industry; stimulate green competition; raise consumer awareness of green building benefits; and transform the building market. Please address and incorporate LEED within the project design, where appropriate.

LEED provides a complete framework for assessing building performance and meeting sustainability goals. Based on well-founded scientific standards, LEED emphasizes state of the art strategies for sustainable site development, water savings, energy efficiency, materials selection and indoor environmental quality. LEED recognizes achievements and promotes expertise in green building through a comprehensive system offering project certification, professional accreditation, training and practical resources. For more information, contact the U.S. Green Building Council at the following web address: <http://www.usgbc.org/leed>.

### **Distribution List**

An EIS should include a Distribution List of agencies, organizations, and persons to whom copies of the document were sent as indicated in 40 CFR §1502.10 under "Recommended format" and §I 502.I9. A Distribution List identifies those parties who have been given the opportunity to comment and reveals that those not included on the list may need to be given the EIS for review. This information is critical to ensuring all necessary parties are given the opportunity to review and provide input to the impacts of the proposed action.



IN REPLY REFER TO:  
NCPC FILE No. MP 201

September 25, 2017

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

Re: Food and Drug Administration Headquarters Consolidation –  
White Oak Master Plan Scoping Comments

Dear Mr. Gyamfi:

Thank you for the opportunity to provide scoping comments on the preparation of an Environmental Impact Statement (EIS) for the proposed Food and Drug Administration (FDA) Headquarters Consolidation, and for working with National Capital Planning Commission (NCPC) staff early in the process. The General Services Administration (GSA), in coordination with FDA, will prepare a master plan for the campus to allow the consolidation of employees currently in leased buildings and accommodate growth related to user fee programs.

According to the scoping materials, the total employee population may approach 18,000, though not all will be present on any given day. The preliminary draft alternatives indicate a variety of building sites, massings and heights to accommodate this expected growth. NCPC staff is particularly interested in understanding the impacts of “building up” versus “building out” on both the natural and man-made environments. It will be helpful to document the trade-offs anticipated, if any, with either approach. A full evaluation of the transportation impacts from the expected employee population will also be critical.

NCPC is the federal planning agency for the National Capital Region, and has an advisory review authority over the campus pursuant to the National Capital Planning Act (40 USC § 8722 (a) and (b)(1)), ensuring an orderly, sustainable, and secure development that helps the FDA meet its mission. NCPC will also review the individual projects that result from master plan.

The following comments highlight relevant regional federal planning policies from the Federal Element of the *Comprehensive Plan for the National Capital* that the GSA and FDA should use to inform the new master plan update, as well as the NEPA documentation and analysis. We request the EIS assess the potential direct, indirect and cumulative impacts of the projects included in the master plan update on the following topic areas:

Mr. Paul Gyamfi

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- Land Use, including planning policies, building use and community facilities and services
- Historic Resources
- Visual Resources
- Socioeconomic Resources, including public space and environmental justice
- Parks and Open Space
- Natural Features, including vegetation, tree canopy and water bodies
- Utilities and Energy, including wastewater, storm water and flooding
- Human health and safety during demolition, construction and operation, including issues of hazardous materials, air quality and noise
- Transportation and Circulation, including vehicular, public transit, pedestrian, bicyclist and parking

NCPC staff is particularly interested in several of these topic areas, as further described below:

#### Environment

The Federal Environment Element establishes a variety of policies that promote the National Capital Region as a leader in environmental stewardship and sustainability. The NEPA document should analyze the consistency of relevant policies with future impacts from proposed future campus development to assist the Commission in its future review of the master plan. In particular, the draft alternatives consider a number of different locations, footprints and building heights to accommodate the proposed development. As noted previously, NCPC staff is particularly interested in understanding the impacts and tradeoffs of building up versus building out. The existing campus includes large wooded areas and natural habitats, as well as existing built and paved areas. The alternatives should be evaluated to identify the impacts to these, as well as pervious coverage, stormwater and flooding. In general, the master plan should avoid siting new facilities in natural areas, and existing surface parking areas should be developed first.

As the master plan is further developed, NCPC staff offers the following specific recommendations for consideration:

#### *Air Quality*

- Decreasing federal employee use of single-occupant vehicles and reducing the number and length of trips through operational policies, such as reduced parking ratios using Transportation Demand Management techniques and the location and design of workplace facilities.
- Establishing alternative fueling locations on federal property and assigning preferred parking spots for low emission vehicles.
- Designing parking areas to support electric vehicle charging stations, where electricity sources are from renewable resources.

### *Water Resources and Stormwater Management*

- Use pervious surfaces and bio-retention facilities, if appropriate to the site, to reduce stormwater runoff and impacts on off-site water quality.
- Encourage the use of innovative and environmentally-friendly “Best Management Practices” in site and building design and construction practice, such as green roofs, bio-retention ponds, vegetated filtration strips, rain gardens, and permeable surface walkways, to reduce erosion and clean and capture stormwater on-site.
- Use technical guidance provided by the Environmental Protection Agency, in addition to working with local jurisdictions, to meet both federal and local stormwater requirements.
- Encourage the natural recharge of groundwater and aquifers by limiting the creation of impervious surfaces, avoiding disturbance to wetlands and floodplains, designing stormwater swales and collection basins on federal installations, and using pervious surfaces wherever possible.
- Avoid sites that have high stormwater retention value, such as areas with soils that have high infiltration rates or discharge directly into wetlands or water bodies. Promote development on previously disturbed sites, especially those with impervious surfaces or compacted soil so that redevelopment can achieve better filtration.

### *Flooding*

- Discourage investment in floodplain areas unless related to correcting flood hazards, restoring floodplain values, or supporting conservation, passive recreation, or memorial uses.
- Encourage modification of existing developments to remove or mitigate flood hazards, restore floodplain values, and improve water management.

### *Waterbodies and Wetlands*

- Avoid intensive land uses with high amounts of impervious surface or significant pollution discharges within or adjacent to wetlands and riparian areas.
- Create vegetative and open space buffers around wetlands, waterways, or riparian areas when constructing near wetlands.
- Coordinate wetland activities with federal, state, and local government programs and regulations, including the Chesapeake Bay Program. Support local and regional watershed implementation plans and regulations.
- Promote improvement of degraded wetlands, especially during significant building or site improvements on federal property.

### *Tree Canopy and Vegetation*

- Preserve existing vegetation, especially large stands of trees.

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- When tree removal is necessary, trees should be replaced to prevent a net tree loss to the project area.
- Enhance the environmental quality of the National Capital Region by replacing existing trees where they have died or where they have been removed due to development. Tree replacement should adhere to the standards and guidelines of the local jurisdiction, but at a minimum prevent a net tree loss in the development area.
- Incorporate new trees and vegetation into plans and projects to absorb carbon dioxide, moderate temperatures, minimize energy consumption, reduce pollution, and mitigate stormwater runoff. This includes the use of vegetation in the design and development of green roof projects where feasible and consistent with local regulations.
- Maintain and preserve woodlands adjacent to waterways, especially to aid in the control of erosion, sediment, and thermal pollution.
- Encourage the use of native plant species and remove invasive plants where appropriate.

#### *Light Pollution*

- Select the appropriate level of lighting to meet design needs, while minimizing excess light.
- Design light fixtures to eliminate upward and horizontal spillage.
- Design and provide appropriate controls to operate lighting only when needed, and at appropriate light levels.
- Select lighting that minimizes maintenance, reduces energy use, and provides better visibility.
- Select appropriate lighting technologies for the context.

#### Transportation

The NCPC Comprehensive Plan's Transportation Element establishes policies to promote multi-modal transportation and efficient development throughout the region. Given the potential changes in visitation and employment, the EIS should fully evaluate any resulting transportation impacts. NCPC staff encourages GSA and FDA to continue efforts to promote the use of public transportation and other non-single occupancy vehicle use. Alternative transportation modes, including bicycling and walking should be considered, and any changes to existing networks should be documented. As such, NCPC staff is interested in the comprehensive analysis and evaluation of cumulative traffic impacts, as well as any off-site mitigation measures.

The master plan should also clearly reflect the proposed number of parking spaces at the installation. The *Comprehensive Plan* recommends a goal of one employee space for every 1.5–2.0 employees. However, in light of Montgomery County's planned Bus Rapid Transit (BRT) network and planned nearby mixed-use developments, NCPC staff recommends that GSA and FDA use a master plan goal that is closer to 1:2.0.

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Additionally, the future master plan update should be developed with a detailed, usable Transportation Management Plan (TMP) that outlines how the campus will achieve its long-term parking ratio goal. The EIS and TMP should evaluate the ability of the installation to maintain this parking ratio over the timeframe of the master plan. In addition, the EIS should describe the proposed measures that will implement the TMP, including the current and future demand for employee, visitor and contractor parking; and strategies to reduce parking demand and increase access to other modes of transportation.

As part of the master planning process, we encourage you to meet with Montgomery County to explore future opportunities to improve Ride-On bus transit service, local bicycle routes, and nearby pedestrian facilities to enable more commuting via these “alternative” modes. Based on local and regional plans for the area, the White Oak campus appears to be in an opportune situation to reduce its reliance on Single Occupant Vehicle (SOV) travel during the timeframe of the master plan.

As the master plan is further developed, NCPC staff offers the following specific recommendations for consideration:

#### *Parking*

- Give priority parking spaces to carpool and vanpool vehicles, hybrid vehicles, and other vehicles utilizing “clean” technology.
- Provide temporary parking for official vehicles and visitors. The number and location of spaces should be justified in the facility’s master plan and TMP.
- Place parking in structures, preferably below ground, in the interest of efficient land use and good urban design. Any parking facility, including surface parking lots and free-standing parking structures, should be designed and constructed to be sensitive to the surrounding context and in an environmentally-sensitive manner using features such as permeable pavers, bioswales, green roofs, solar panels, and/or wind turbines. Parking structure design should provide opportunities for future conversion to open or usable space and enhance adjacent public space, where possible.
- Consider nearby commercial parking space availability when calculating parking requirements, presuming that employees who choose to drive can purchase parking in nearby private or public facilities at market rates.
- Evaluate opportunities to share parking spaces with nearby uses or lease parking spaces to local car share services.

#### *Transportation Management Plans*

- Prepare TMPs that encourage employee commuting and work-related travel by modes other than the single-occupant vehicle. The TMP should evaluate opportunities and establish goals for employee commuting and work-related trips through active commuting, the use of telework and flexible schedules, transit, as well as car-sharing and vehicle pooling.

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- Develop TMPs that explore methods and strategies to meet prescribed parking ratios. A thorough rationale and technical analysis must be provided to support all TMP findings and goals.
- Analyze scenarios that incorporate data on employee home zip codes; nearby commuter and transit bus routes, Metrorail, commuter rail lines and their schedules; availability and expansion of Capital Bikeshare at home/office locations; carpool/vanpools; bicycle routes; and existing and planned HOV (High Occupancy Vehicle) and HOT (High Occupancy Toll) lanes.
- Include, within TMPs, implementation plans with specific proposed actions and timetables outlining each agency's commitment to reaching short- and long-term TMP goals, as well as goals established in their Strategic Sustainability Performance Plans.
- Reflect, within TMPs, planned regional and local transportation infrastructure or service improvements within five miles of the federal facilities.
- Assess, as part of a traffic impact study, a project or master plan's forecasted impacts on the surrounding roadway network, transit network and surrounding station, and bike and pedestrian access.

#### Historic Preservation and Urban Design

The Urban Design Element establishes policies that promote quality design and development in the National Capital Region to reinforce its unique role as the nation's capital and creates a welcoming and livable environment for people. As noted previously, the proposed alternatives consider a variety of sites and massings for proposed developments. These alternatives should be analyzed for their impacts to historic resources, as well as visual impacts to the existing campus and important views. Further, the master plan should consider planning and design strategies that promote a pedestrian and bicycle-friendly campus, as well as improved connectivity to the surrounding community.

The NEPA document should analyze the consistency of relevant design policies with future impacts from proposed campus development to assist the Commission in its review of the master plan. In particular, these may include understanding the existing installation characteristics and surroundings. The master plan should identify urban design policies, including topics such as building groupings, massing, and architectural character; streetscape, landscape elements, and character; signage and parking. Finally, utilitarian or routine support functions, which should generally be sited and designed to avoid or minimize intrusion on principal urban design features.

NCPC staff notes that the Commission last reviewed the White Oak Campus Master Plan in December 2009. Attached to this letter is the Commission's final approval action, which includes several stipulations related to increasing visitor parking and the campus TMP. Please include background summary information regarding how GSA and FDA responded to these previous approval conditions as part of the draft master plan submission to the Commission.

Mr. Paul Gyamfi  
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These comments have been prepared in accordance with NCPC's Environmental and Historic Preservation Policies and Procedures. NCPC appreciates the opportunity to provide scoping comments, and looks forward to our continued involvement in the NEPA and master plan update processes. If you have any questions about these comments, please contact Vivian Lee at (202) 482-7238 or [vivian.lee@ncpc.gov](mailto:vivian.lee@ncpc.gov), or please consult the NCPC website ([www.ncpc.gov](http://www.ncpc.gov)) for further information on the Comprehensive Plan or our master plan submission guidelines.

Sincerely,

Diane Sullivan  
Director, Urban Design and Plan Review Division

cc: Maryland-National Capital Planning Commission  
Montgomery County Planning Department  
Prince George's County Planning Department  
Maryland Historical Trust

JHEANELLE WILKINS  
Legislative District 20  
Montgomery County  
—  
Ways and Means Committee



The Maryland House of Delegates  
6 Bladen Street, Room 224  
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410-841-3493 · 301-858-3493  
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Jheanelle.Wilkins@house.state.md.us

THE MARYLAND HOUSE OF DELEGATES  
ANNAPOLIS, MARYLAND 21401

September 25, 2017

Dear Office of Planning & Design Quality:

Thank you for the opportunity to comment on the upcoming Master Plan for the Food & Drug Administration (FDA) consolidation at White Oak. I am Maryland State Delegate Jheanelle Wilkins, and I represent the 20th Legislative District, which includes the FDA facility in White Oak. I am proud to have the FDA in our community, and my office is committed to ensuring the success of this project along with the full inclusion of the residents in District 20.

Studying the environmental impact land usage has on the community is critical, as it affects not only natural resources but also the health and wellness of individuals. In anticipation of the new development, I urge your agency to study not only the environmental impact, but the economic and social impacts as well.

Impact on Small Businesses

As you know, new developments and additional employees often bring more resources such as accessibility of goods and services along with new job opportunities, however new projects and developments can sometimes leave residents displaced and force small businesses to relocate. Within your study, I urge the Planning & Design Quality Committee to study the impact the development will have on local businesses especially small, minority-owned businesses.

White Oak is home to various family-owned businesses that have served our community for decades. These businesses help make our neighborhood unique. Any potential for increased cost of business is a threat to not only small business owners, but also the culture of our community. Therefore, I urge the study to identify the number of small businesses within the White Oak community, the current cost of commercial property rent and the likelihood that the FDA project will impact these businesses.



### Impact on Renters and Residential Property Owners

Projects of this nature may cause displacement for residents as a result of increased housing cost. A common concern when redevelopment arises is the impact on affordable housing not only for new residents but for natives to the area as well.

As a result, your study should gather data regarding the status among people that are renting, which class of persons could be impacted; and the possibility of increases in housing cost. Of particular concern are low-income residents that might be subjected to displacement. I request that your study include the average household income compared to the current cost of living in White Oak and potential impacts on low and moderate income residents.

### Impact on Jobs and Health

Additionally, I urge the study to include how the new project will impact access to jobs, opportunities for training development, and the impact on health.

As you know the new development of businesses will afford the community with new job opportunities, however local candidates for employment may either be under or over qualified. Therefore, I urge the study to identify the skills needed to establish a career path within the FDA for the benefit of local residents. It's also critical that the study compares current skills of the community with the jobs the FDA seeks to provide and identify the cost of training and development to prepare residents for the future job market.

With regards to other areas, I urge the study to address the health impact. The study should identify how the project will inhibit or support access to affordable and healthy foods. Access to healthcare and social programs that promote the overall health and wellness in the community is key in efforts to maintain a healthy lifestyle. Thus, I urge your study to take a look at the current access to health resources and compare it to the impact the project will have on the community after the development.

Again, thank you for this opportunity to comment and provide input on the Master Plan for FDA headquarters. I enthusiastically look forward to this project and the benefits that it will provide to our community.

Yours in service,



Delegate Jheanelle Wilkins, District 20  
Jheanelle.Wilkins@house.state.md.us  
410-841-3493



*Larry Hogan, Governor  
Boyd Rutherford, Lt. Governor  
Mark Belton, Secretary  
Joanne Throwe, Deputy Secretary*

September 8, 2017

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

**RE: Environmental Review for Master Plan of FDA Headquarters Consolidation at the Federal Research Center at White Oak, Silver Spring, Montgomery County, Maryland.**

Dear Mr. Gyamfi:

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

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

Sincerely,

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

ER# 2017.1293.mo



Larry Hogan, Governor  
Boyd Rutherford, Lt. Governor

Wendi W. Peters, Secretary  
Ewing McDowell, Deputy Secretary

August 23, 2017

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

**STATE CLEARINGHOUSE REVIEW PROCESS**

**State Application Identifier:** MD20170818-0719

**Reply Due Date:** 09/27/2017

**Project Description:** Scoping for an Environmental Impact Statement for the Master Plan of the U.S. Food and Drug Administration (FDA) Headquarters Consolidation at the Federal Research Center at White Oak, Silver Spring, MD (See MD20090805-1152)

**Project Location:** County(ies) of Montgomery

**Clearinghouse Contact:** Lacey Barry

Dear Mr. Gyamfi:

Thank you for submitting your project for intergovernmental review. Your participation in the Maryland Intergovernmental Review and Coordination (MIRC) process helps to ensure that your project will be consistent with the plans, programs, and objectives of State agencies and local governments.

We have forwarded your project to the following agencies and/or jurisdictions for their review and comments: the Maryland Department(s) of General Services, the Environment, Natural Resources, Transportation, Planning including the Maryland Historical Trust; and Montgomery County. A composite review and recommendation letter will be sent to you by the reply due date. Your project has been assigned a unique State Application Identifier that you should use on all documents and correspondence.

Please be assured that we will expeditiously process your project. The issues resolved through the MIRC process enhance the opportunities for project funding and minimize delays during project implementation.

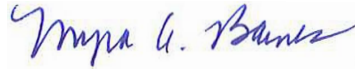
Mr. Paul Gyamfi

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State Application Identifier #: MD20170818-0719

If you need assistance or have questions, contact the State Clearinghouse staff noted above at 410-767-4490 or through e-mail at lacey.barry@maryland.gov. Thank you for your cooperation with the MIRC process.

Sincerely,

A handwritten signature in blue ink that reads "Myra A. Barnes". The signature is written in a cursive style and is positioned above the typed name.

Myra Barnes, Lead Clearinghouse Coordinator

MB:LB

Enclosure(s)

cc: Mary D. Gilbert, Regional Commissioner, U.S. GSA

17-0719\_NRR.NEW4.docx



Larry Hogan, Governor  
Boyd Rutherford, Lt. Governor

Robert S. McCord, Acting Secretary

November 9, 2017

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

**STATE CLEARINGHOUSE RECOMMENDATION**

**State Application Identifier:** MD20170818-0719

**Applicant:** U.S. General Services Administration

**Project Description:** Scoping for an Environmental Impact Statement for the Master Plan of the U.S. Food and Drug Administration (FDA) Headquarters Consolidation at the Federal Research Center at White Oak, Silver Spring, MD (See MD20090805-1152)

**Project Location:** County of Montgomery

**Approving Authority:** U.S. General Services Administration (GSA)

**Recommendation:** Consistent with Qualifying Comments

Dear Mr. Gyamfi:

In accordance with Code of Maryland Regulations (COMAR) 34.02.02.04-.07, the State Clearinghouse has coordinated the intergovernmental review of the referenced project. This letter constitutes the State process review and recommendation. As a result of the review, it is recommended that the U.S. General Services Administration (GSA), in cooperation with the U.S. Food and Drug Administration (FDA), prepare an Environmental Impact Statement (EIS) to analyze the potential impacts from the Federal Research Center at White Oak, located in Silver Spring, Maryland.

Review comments were requested from the Maryland Departments of General Services, Natural Resources, Transportation, Environment, Planning, including the Maryland Historical Trust; and Montgomery County. As of this date, the Maryland Department of Natural Resources has not submitted comments.

The Maryland Departments of General Services, Transportation, and Planning, including the Maryland Historical Trust found this project to be consistent with their plans, programs, and objectives.

The Maryland Department of Planning commented as follows: The project is consistent with our plans, programs and objectives.

The Maryland Historical Trust commented as follows: The Maryland Historical Trust will continue to work with the FDA and GSA to finish the historic preservation review (NSL 201705450).



Larry Hogan, Governor  
Boyd Rutherford, Lt. Governor

Robert S. McCord, Acting Secretary

November 9, 2017

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

**STATE CLEARINGHOUSE RECOMMENDATION**

**State Application Identifier:** MD20170818-0719

**Applicant:** U.S. General Services Administration

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**Project Location:** County of Montgomery

**Approving Authority:** U.S. General Services Administration (GSA)

**Recommendation:** Consistent with Qualifying Comments

Dear Mr. Gyamfi:

In accordance with Code of Maryland Regulations (COMAR) 34.02.02.04-.07, the State Clearinghouse has coordinated the intergovernmental review of the referenced project. This letter constitutes the State process review and recommendation. As a result of the review, it is recommended that the U.S. General Services Administration (GSA), in cooperation with the U.S. Food and Drug Administration (FDA), prepare an Environmental Impact Statement (EIS) to analyze the potential impacts from the Federal Research Center at White Oak, located in Silver Spring, Maryland.

Review comments were requested from the Maryland Departments of General Services, Natural Resources, Transportation, Environment, Planning, including the Maryland Historical Trust; and Montgomery County. As of this date, the Maryland Department of Natural Resources has not submitted comments.

The Maryland Departments of General Services, Transportation, and Planning, including the Maryland Historical Trust found this project to be consistent with their plans, programs, and objectives.

The Maryland Department of Planning commented as follows: The project is consistent with our plans, programs and objectives.

The Maryland Historical Trust commented as follows: The Maryland Historical Trust will continue to work with the FDA and GSA to finish the historic preservation review (NSL 201705450).

Mr. Paul Gyamfi

November 9, 2017

Page 2

State Application Identifier: **MD20170818-0719**

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

- 1.e 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.e
- 2.e 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.e
- 3.e 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.e
- 4.e 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.e
- 5.e Any contract specifying “lead paint abatement” must comply with Code of Maryland Regulations (COMAR) 26.16.01 - Accreditation and Training for Lead Paint Abatement Services. If a property was built before 1950 and will be used as rental housing, then compliance with COMAR 26.16.02 - Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.e
- 6.e The proposed project may involve rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Program (VCP) may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please contact the Land Restoration Program at (410) 537-3437.e

Mr. Paul Gyamfi

November 9, 2017

Page 3

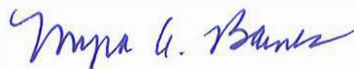
State Application Identifier: **MD20170818-0719**

The State Clearinghouse must be kept informed of all decisions made regarding this project.

We appreciate your attention to the intergovernmental review process and look forward to your continued cooperation. If you need assistance or have questions, contact the State Clearinghouse staff person noted above at 410-767-4510 or through email at [lacey.barry@maryland.gov](mailto:lacey.barry@maryland.gov).

Thank you for your cooperation with the MIRC process.

Sincerely,



Myra Barnes, Lead Clearinghouse Coordinator

MB:LB

Enclosure(s)

cc:

Greg Golden - DNR  
Amanda Degen - MDE

Tina Quinichette - MDOT  
Wendy Scott-Napier - DGS

Greg Ossont - MTGM  
Joseph Griffiths - MDPL

Beth Cole - MHT

17-0719\_CRR.CLS.docx





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:** MD20170818-0719  
**Project Description:** Scoping for an Environmental Impact Statement for the Master Plan of the U.S. Food and Drug Administration (FDA) Headquarters Consolidation at the Federal Research Center at White Oak, Silver Spring, MD (See MD20090805-1152)

<b>PROJECT APPROVAL</b>			
This project/plan was:	<input type="checkbox"/> Approved	<input type="checkbox"/> Approved with Modification	<input type="checkbox"/> Disapproved
Name of Approving Authority:			Date Approved:

<b>FUNDING APPROVAL</b>			
The funding (if applicable) has been approved for the period of:			
_____, 201__ to _____, 201__ as follows:			
Federal \$:	Local \$:	State \$:	Other \$:

<b>OTHER</b>
<input type="checkbox"/> Further comment or explanation is attached



STATE HIGHWAY  
ADMINISTRATION

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

September 14, 2017

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

Thank you for your letter regarding the U.S. General Services Administration (GSA) scoping for an Environmental Impact Statement (EIS) to analyze the potential impacts of the proposed Master Plan for the US Food and Drug Administration Headquarters consolidation. I appreciate the opportunity to provide recommendations and comments during your scoping process.

The MDOT's fiscally unconstrained Highway Needs Inventory (NHI) which is our long-range planning document, includes US 29 (Colesville Road Columbia Pike) divided highway reconstruction between MD 97 (Georgia Avenue) and MD 650 (New Hampshire Avenue), to include managed lanes and bus lanes, and US 29 (Columbia Pike) freeway reconstruction between MD 650 (New Hampshire Avenue) and the Patuxent River/Howard County line, to include managed lane, bus lanes, and interchanges. While the HNI does indicate a transportation need, it is an unconstrained list and does not indicate the identification or allocation of funding for improvements. The State's fiscally-constrained Fy 2017-2022 Consolidated Transportation Program (CTP) includes projects funded for construction and for development and evaluation. Regarding US 29, the CTP includes the design of a US 29 interchange at Musgrove and Fairland roads, which MDOT SHA deferred in 2016. Additionally, the CTP includes the design of US 29 interchanges at Stewart Lane, Tech Road, Greencastle Road, and Blackburn Road, which remains on hold since 2005.

The HNI includes MD 212 (Powder Mill Road) divided highway reconstruction to widen MD 212 to four lanes between Pleasant Acres Drive and I-95. While the HNI does indicate a transportation need, it is an unconstrained list and does not indicate the identification or allocation of funding for improvements. MD 212 widening between Cherry Hill Road I-95 is complete. The 1990 Maryland-National Capital Park and Planning Commission (MNCPPC) Sub region I Sector Plan and 2009 MNCPPC Prince George's County Master Plan of Transportation (PGMPoT) recommends widening MD 212 to six lanes between Montgomery County line and US 1 (Baltimore Avenue). The 2009 PGMPoT also recommends constructing MD 212 bicycle and pedestrian accommodations in the same segment. The CTP includes projects funded for construction and/or development and evaluation. Additionally, MD 212 widening is not included in the CTP at this time.

Mr. Paul Gyamfi  
Page Two

In the late 1990s, a concept for a MD 212 (Powder Mill Road) interchange at Cherry Hill Road was developed to improve access to the then-Federal Research Center and the United States Army Research Laboratory (see Attachment 1). This concept consists of a grade-separated MD 212 interchange at Cherry Hill Road with a structure carrying a three-lane Coffman Road (renamed Dahlgren Road) east over MD 212 to a new four-lane service road that would terminate at a signalized MD 212 intersection at High Point High School. The substantial time that has passed since this interchange concept was developed, and the substantial increase in employment from the ongoing and anticipated FDA headquarters campus expansion, warrants new coordination between various federal, State, and local stakeholders to address current transportation needs. Additionally, I have attached representatives from different agencies for GSA to contact if you wish to receive further suggestions.

Thank you again for your letter. If you have any additional questions or comments, please contact C. Scott Pomento, P.E., MDOT SHA Office of Planning and Preliminary Engineering Director, at 410-545-0412 or via email at [spomento@sha.state.md.us](mailto:spomento@sha.state.md.us). You may also contact Mr. Matt Baker, MDOT SHA Regional Planner for Montgomery County, at 410-545-5668 or via email at [mbaker4@sha.state.md.us](mailto:mbaker4@sha.state.md.us), or Mr. David Rodgers, MDOT SHA Regional Planner for Prince George's County, at 410-545-5670 or via email at [drodgers1@sha.state.md.us](mailto:drodgers1@sha.state.md.us). Mr. Pomento, Mr. Baker, and Mr. Rodgers will be happy to assist you.

Sincerely,



Gregory Slater  
Administrator

Attachments

cc: C. Scott Pomento, P.E., Director, Office of Planning and Preliminary Engineering, MDOT  
SHA  
Mr. Matt Baker, Regional Planner for Montgomery County, MDOT SHA  
Mr. David Rodgers, Regional Planner for Prince George's County, MDOT SHA

## Attachment II

The MDOT SHA encourages the U.S. General Services Administration to contact the following agencies and individuals for further suggestions:

- Maryland Department of Transportation Maryland Transit Administration (MDOT MTA)

Ms. Holly Arnold  
Acting Director  
Office of Planning and Programming  
Maryland Transit Administration  
Maryland Department of Transportation  
6 Saint Paul Street  
Baltimore MD 21202  
[harnold@mta.maryland.gov](mailto:harnold@mta.maryland.gov)

- Montgomery County Government

Stephen Aldrich, P.E.  
Master Planner-Transportation Planning  
Functional Planning and Policy Division  
Montgomery County Planning Department  
Maryland-National Capital Park and Planning Commission  
8787 Georgia Avenue  
Silver Spring MD 20910  
[stephen.aldrich@montgomeryplanning.org](mailto:stephen.aldrich@montgomeryplanning.org)

- Maryland-National Capital Park and Planning Commission, Prince George's County Planning Department

Mr. Tom Masog  
Planning Supervisor-Transportation Planning  
Transportation Planning Section  
Prince George's County Planning Department  
Maryland-National Capital Park and Planning Commission  
14741 Governor Oden Bowie Drive  
Upper Marlboro MD 20772  
[tom.masog@ppd.mncppc.org](mailto:tom.masog@ppd.mncppc.org)

- Montgomery County Department of Transportation

Andrew Bossi, P.E.  
Senior Engineer  
Office of the Director  
Montgomery County Department of Transportation  
101 Monroe Street, 10th Floor  
Rockville MD 20850  
[andrew.bossi@montgomerycountymd.gov](mailto:andrew.bossi@montgomerycountymd.gov)



MONTGOMERY COUNTY FIRE AND RESCUE SERVICE

Isiah Leggett  
*County Executive*

Scott E. Goldstein  
*Fire Chief*

September 25, 2017

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

Dear Mr. Gyamfi:

Thank you for the opportunity to provide comments concerning the Scoping for the Environmental Impact Statement for the Master Plan of the Food and Drug Administration (FDA) Headquarters Consolidation at the Federal Research Center at White Oak. Upon viewing the scoping materials provided, the Montgomery County Fire and Rescue Service (MCFRS) has the following comments:

- We take no position regarding the proposed FDA consolidation at the Federal Research Center at White Oak or which of the four alternatives under consideration by the General Services Administration (GSA), including the three build-alternatives and the no-build alternative, is eventually selected for implementation. Additionally, we take no position concerning the proposed development areas depicted in the scoping materials' presentation slides.
- Based upon information in the scoping materials and MCFRS data pertaining to fire-rescue incidents having occurred at the FDA Headquarters between 2012 and 2016, we anticipate the proposed expansion of the employee population and additional proposed buildings under the various build- alternatives would result in approximately a doubling of fire, rescue and emergency medical services (EMS) incidents at the Center, from about 70 incidents annually to approximately 145 annually – mostly EMS incidents. This increase will contribute to the need for additional MCFRS resources to be deployed within the Hillandale-White Oak area.

---

100 Edison Park Drive, 2nd Floor • Gaithersburg, Maryland 20878 • 240-777-2486 • 240-777-2414 FAX  
[www.montgomerycountymd.gov/mcfrs](http://www.montgomerycountymd.gov/mcfrs)

Letter to Mr. Paul Gyamfi

September 25, 2017

Page 2

- Upon viewing the aerial view depictions of the three build-alternatives (A, B and C), we noticed a lack of vehicular access around all sides of the proposed buildings. While we recognize that these drawings may lack this level of detail, we recommend that all new buildings have paved vehicular access ways surrounding the buildings to accommodate tactical positioning of fire-rescue vehicles during emergency events.

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](mailto:scott.gutschick@montgomerycountymd.gov) or on 240-777-2417.

Sincerely,



Scott E. Goldstein

Fire Chief

SEG/sg

cc: Scott Gutschick, Manager, Planning and Accreditation Section, MCFRS



14741 Governor Oden Bowie Drive  
Upper Marlboro, Maryland 20772  
[www.mncppc.org/pgco](http://www.mncppc.org/pgco)

301-952-3595  
**D17-082101**

August 31, 2017

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

**RE: Draft Environmental Impact  
Statement for Master Plan of FDA  
Headquarters Consolidation at  
White Oak**

Dear Mr. Gyamfi:

The Prince George's County Planning Department appreciates the opportunity to comment on the plans to prepare an Environmental Impact Statement (EIS) for the Master Plan of the U.S. Food and Drug Administration (FDA) headquarters consolidation at the Federal Research Center at White Oak in Silver Spring, Maryland. To accommodate the future growth and further consolidation of FDA operations, the U.S. General Services Administration (GSA) is preparing an EIS to assess the impacts of an increase of 18,000 employees over 15 years.

The Planning Department has analyzed the potential impacts on the portion of the property that is within Prince George's County and found that the project does not impact any transportation or known designated Historic Sites, Resources, or Archeological Resources. If there is any new development planned for the portion of the site within Prince George's County, the Environmental Planning Section would like to review any disturbances to woodlands or regulated environmental features.

Thank you again for allowing us the opportunity to comment on this proposed project. If you should have any additional questions or need additional information, please contact Maria Martin, Planning Supervisor, Special Projects Section, Countywide Planning Division, at 301-952-3472, or via email at [Maria.Martin@ppd.mncppc.org](mailto:Maria.Martin@ppd.mncppc.org).

Sincerely,

Andree Green Checkley  
Planning Director

c: Derick Berlage, Chief, Countywide Planning Division  
Maria Ann Martin, Planning Supervisor, Special Projects Section, Countywide Planning Division  
Howard Berger, Planning Supervisor, Historic Preservation Section, Countywide Planning Division  
Tom Masog, Planning Supervisor, Transportation Planning Section, Countywide Planning Division  
Katina Shoulars, Planning Supervisor, Environmental Planning Section, Countywide Planning Division



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

September 22, 2017

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: Draft Environmental Impact  
Statement for Master Plan of FDA  
Headquarters Consolidation at  
White Oak**

Dear Mr. Gyamfi:

It is our understanding that the U.S. General Services Administration (GSA) intends to prepare an Environmental Impact Statement (EIS) to analyze the potential impacts resulting from the Master Plan update to support the U.S. Food and Drug Administration (FDA) Headquarters consolidation at the Federal Research Center (FRC) at White Oak in Silver Spring, Maryland. The update is being prepared by GSA to support the addition of 7,000 employees and \$1 billion of additional development over the next decade. The Prince George's County Planning Department provided initial comments regarding this effort dated August 31, 2017.

Subsequently, GSA provided a briefing and a tour of the FRC campus for planning staff. In response, we would offer the following supplemental comments on scoping issues for the EIS as they would relate to our County:

1. The EIS must review traffic issues as they relate to the following intersections:
  - a. Powder Mill Road (MD 212) and Cherry Hill Road; and
  - b. MD 212 and Beltsville Drive.

We believe that as the FRC expands, development will move closer to the Prince George's County side of the facility, and the traffic review should consider trucks as well as automobiles. It should also be noted that the County will have concerns about any strategy that would make Cherry Hill Road the primary entrance for trucks onto the FRC.

2. As noted in the August 31, 2017 letter, the Planning Department would like to review any proposed disturbances to woodlands or regulated environmental features on the portion of the FRC within Prince George's County. However, we also recognize in a formal sense that any impacts would be under the jurisdiction of the Maryland Department of the Environment or the Maryland Department of Natural Resources.



Mr. Paul Gyamfi  
September 22, 2017  
Page 2

The expansion of the FRC, combined with additional development that is occurring in Montgomery County adjacent to the FRC, provides an exciting opportunity in Prince George's County as well. Please keep us engaged in your work as we consider ways that our County can benefit from the expansion.

Thank you again for giving us the opportunity to provide supplemental comments on scoping for the EIS. If you should have additional questions or need additional information, please contact Thomas Masog, Planning Supervisor, Transportation Planning Section, Countywide Planning Division, at (301) 952-5216, or via email at [tom.masog@ppd.mncppc.org](mailto:tom.masog@ppd.mncppc.org).

Sincerely,



Andree Green Checkley  
Planning Director

c: Barry L. Stanton, Deputy Chief Administrative Officer for Public Infrastructure  
Gwen Wright, Planning Director, Montgomery County Planning Department  
Derick Berlage, Chief, Countywide Planning Division  
Tom Masog, Supervisor, Transportation Planning Section, Countywide Planning Division  
Katina Shoulars, Supervisor, Environmental Planning Section, Countywide Planning Division  
Maria Martin, Supervisor, Special Projects Section, Countywide Planning Division



ROCKVILLE, MARYLAND

September 25, 2017

Mr. Paul Gyamfi  
Office of Planning and Design Quality  
Public Buildings Service  
National Capital Region  
30 7<sup>th</sup> Street, S.W., Room 4004  
Washington, D.C. 20407

RE: Proposed Master Plan – Montgomery County Comments

Dear Mr. Gyamfi:

Please accept the statement below as Montgomery County's comments on the proposed Environmental Impact Statement (EIS) project associated with the FDA Master Plan.

“Montgomery County recently completed a comprehensive study of transportation system needs to accommodate growth in the White Oak Area known as the *White Oak Local Area Transportation Improvement Program (LATIP)*.” More information on the LATIP can be found at: <https://www.montgomerycountymd.gov/dot-dir/Resources/Files/LATR-WhitePaper.pdf>.

The LATIP should serve as a good platform for any transportation impact analysis conducted as part of the EIS. We request that the transportation impact from the FDA expansion alternatives, including the federally-owned facilities which are not considered in the County's White Oak Science Gateway Master Plan, be considered within the framework of the LATIP. For alternatives that focus on the growth of leased-facilities on private property, the transportation impacts are likely accounted for in the LATIP study.

Additionally, the County will be establishing a Transportation Management District (TMD) for the White Oak area to offer and coordinate transportation demand management programs in this portion of the County. We ask that goals established for employment expansion and program needs for non-auto drive mode share (NADMS), be incorporated into the EIS.

Finally, the County plans to implement Bus Rapid Transit (BRT) on US 29 by 2020. To the extent possible, we ask that the alternatives take full advantage of this new transit service connecting Silver Spring to White Oak, Burtonsville, and future extension into Howard County.”

Montgomery County encourages GSA/NCR to work with its Executive branch on ways to involve the White Oak community throughout the FDA Master Planning and EIS process. Our Representative, Peter Fosselman was hired in 2016 to serve as the White Oak Master Plan Implementation Coordinator. His primary responsibilities are marketing the White Oak region, assisting in the success of new development, and community outreach. Pete is a valuable resource available to help with the FDA/GSA efforts and can serve as a liaison between the Federal government and the local community. Pete can be reached at 240-777-8416 and [peter.fosselman@montgomerycountymd.gov](mailto:peter.fosselman@montgomerycountymd.gov).

Montgomery County looks forward to working with you on this exciting project, and hopes that GSA/NCR sees the County government as a valuable resource in this process. Please let me know if you have any questions or need any assistance as you move forward.

Sincerely,

A handwritten signature in blue ink, appearing to read "CR Benjamin".

Christine R. Benjamin  
Manager, Public-Private Partnerships

# SAUL CENTERS, INC.

7501 Wisconsin Avenue, Suite 1500E, Bethesda, Maryland 20814  
(301) 986-6200

September 25, 2017

Via email at [paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov)

Mr. Paul Gyamfi  
Senior NEPA Compliance Specialist  
Office of Planning and Design Quality  
Public Buildings Service  
National Capital Region  
U.S. General Services Administration  
301 7<sup>th</sup> Street, SW – Room 4004  
Washington, DC 20407

Subject: FDA HQ EIS

Dear Mr. Gyamfi:

Saul Centers, Inc. is a publicly traded real estate investment trust headquartered in Bethesda, Maryland. Saul and its affiliates own and manage commercial buildings totaling over 13.5 million square feet, including approximately 3 million square feet in Montgomery County, Maryland. Saul owns the White Oak Shopping Center, a 480,000 sf shopping center on 27.9 acres along New Hampshire Avenue just north of the main entrance to the FDA Campus. Saul's shopping center property is bounded on the east by New Hampshire Avenue, on the south by Lockwood Drive, and on the north by U.S. Route 29.

The White Oak Science Gateway Master Plan, effective October 31, 2014 (the "WOSG Master Plan") established the County's redevelopment plan for areas adjacent to the FDA Campus. The WOSG Master Plan implemented this redevelopment plan by assigning increased densities to properties in three "Activity Centers." One of these Activity Centers, identified as the "White Oak Center," is located immediately north of the FDA Campus. Saul's property is located at the core of this White Oak Center. (WOSG Master Plan, p. 29.) Portions of the White Oak Center, including Saul's property, have been assigned the highest mixed-use redevelopment densities in the entire WOSG Master Plan area. (WOSG Master Plan, p. 33.)

The WOSG Master Plan correctly identified the White Oak Center as the appropriate location for this mixed-use redevelopment. The White Oak Center is located at the intersection of the two arterial corridors in the WOSG Master Plan area. In addition, the approved U.S. Route 29 Bus Rapid Transit (BRT) line and the planned New Hampshire Avenue BRT line will both run through White Oak Center. These two BRT lines will intersect at a transfer station stop on Lockwood Drive, approximately 1/8 of a mile from the FDA Campus.

To ensure convenient access to BRT and enhance overall connectivity between the White Oak Center and the FDA Campus, the WOSG Master Plan plans a connection between the FDA

**SAUL CENTERS, INC.**

Campus and Lockwood Drive. This "Connection to FDA" is shown in Figure 2 on p. 37 of the WOSG Master Plan. Also on p. 37, the WOSG Master Plan states that "a connection to the FDA should be provided (as shown on Figure 2) to create convenient access to this center for campus employees and visitors." The WOSG Master Plan further states on p. 38 that "the Plan recommends that the County initiate discussions with FDA to facilitate the creation of this connection."

Saul appreciates that the FDA looks to coordinate its efforts with the County's efforts. Accordingly, the FDA's Master Plan Update and its Environmental Impact Statement should be coordinated with the WOSG Master Plan. Specifically, the FDA's Master Plan Update and its EIS need to address and make appropriate plans for the Connection to FDA, to be located generally as shown in Figure 2 on p. 37 of the WOSG Master Plan. The Connection to FDA will greatly benefit the FDA by providing improved access to transit and more options for convenient housing, commercial, office, and other amenities for its employees, customers and contractors.

For your convenience, I have enclosed a copy of the pages from the WOSG Master Plan that are referenced above.

Saul is available and willing to work with the FDA and the County to assist in planning for the Connection to FDA. Saul is also available and willing to discuss with the FDA any opportunities or requirements in connection with FDA's need for facilities to serve the FDA Campus.

Thank you for your consideration, and please feel free to contact the undersigned if you have any questions or need any additional information.

Sincerely,



Brian T. Downie  
Senior Vice President, Development

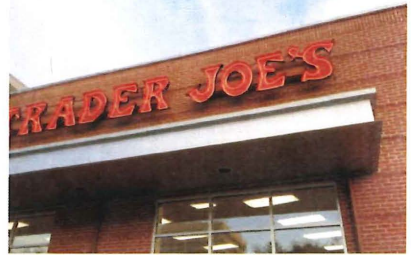
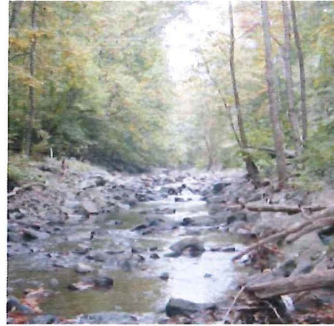
Enclosures

Cc: Casey Anderson, Chairman, Montgomery County Planning Board  
Gwen Wright, Director, Montgomery County Planning Department

JULY 2014

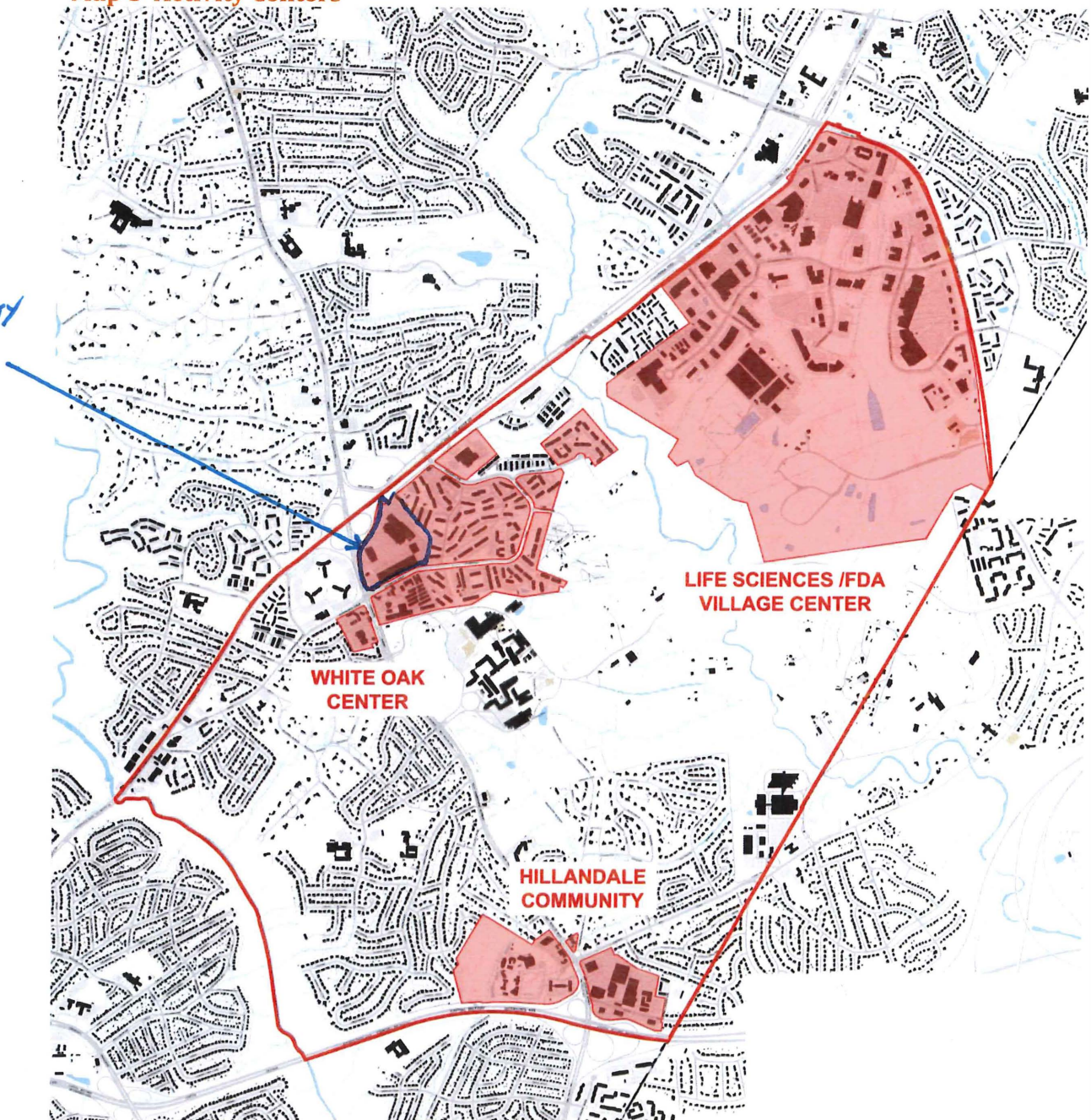
# White Oak Science Gateway Master Plan

APPROVED AND ADOPTED



## Map 5 Activity Centers

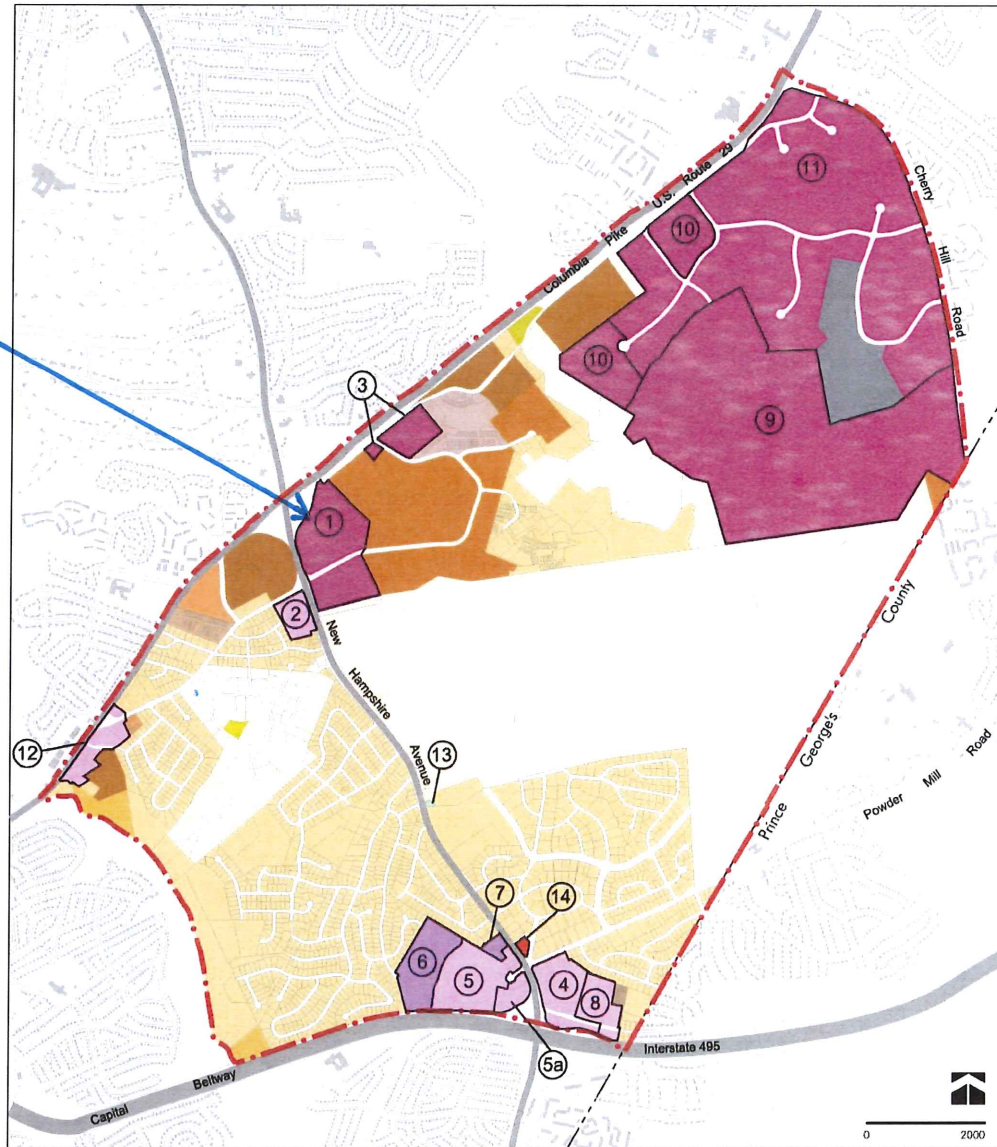
*SAUL  
PROPERTY*



Reshaping and redeveloping the two older shopping centers into sustainable, complete communities is both challenging and necessary. The Plan seeks to change and transform these areas over time, with the support of a future BRT system. Mixed-use developments with walkable centers that bring employment, housing, and shopping opportunities together are desirable for these centers as well. It is especially important that the redevelopment of these sites not result in the long term loss of retail uses that serve the community, and new commercial office uses would also be particularly desirable. This Plan's zoning and infrastructure recommendations strive to encourage the private sector to redesign, redevelop, and reinvest in older centers.

## Map 7 Proposed Zoning

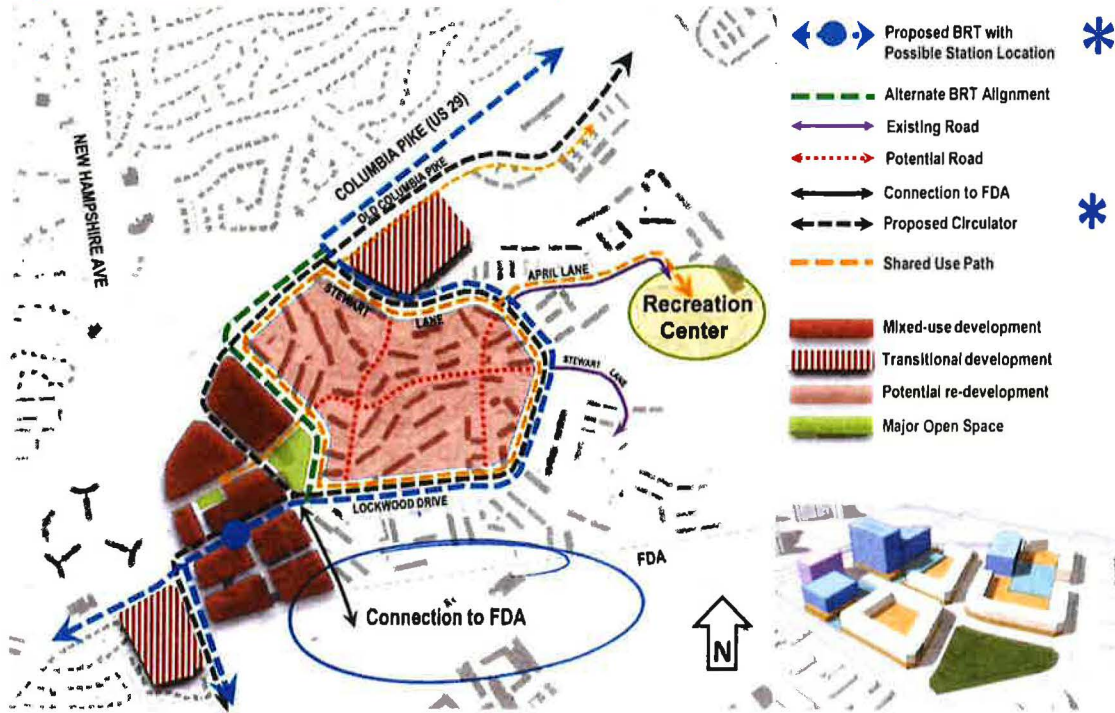
*SAWL  
PROPERTY*



Master Plan Area Boundary	Commercial Residential	Employment Office
County Boundary	1 CR-2.5 C-1.5 R-1.5 H-200	13 EOF-0.75 H-45
RE-2 Residential Estate, 2 Acres	3 CR-1.0 C-1.0 R-0.25 H-65	Neighborhood Retail
RE-1 Residential Estate, 1 Acre	9 CR-1.0 C-1.0 R-0.50 H-220	14 NR-0.75 H-45
R-200 Residential Estate, 1 Acre	10 CR-1.0 C-0.75 R-0.75 H-75	
R-90 One-Family Detached Restricted Residential	11 CR-0.75 C-0.75 R-0.25 H-75	
R-60 One-Family Detached Residential	Commercial Residential Town	
RT-6 Residential, Town House	2 CRT-1.5 C-1.5 R-0.25 H-60	
RT-8 Residential, Town House	4 CRT-1.5 C-1.0 R-1.0 H-75	
RT-10 Residential, Town House	5 CRT-1.5 C-1.0 R-0.75 H-75	
RT-12.5 Residential, Town House	5a CRT-1.75 C-0.5 R-1.5 H-85	
R-20 Multiple-Family Medium-Density Residential	8 CRT-1.0 C-0.75 R-0.25 H-45	
R-H Multiple-Family High-Rise Planned Residential	12 CRT-0.75 C-0.5 R-0.25 H-45	
LSC Life Sciences Center	Commercial Residential Neighborhood	
	6 CRN-0.25 C-0.0 R-0.25 H-45	
	7 CRN-1.0 C-1.0 R-0.0 H-45	



**Figure 2 White Oak Center Illustrative Concept**



The Plan’s long term vision is for a mixed-use walkable center at this important location. An urban plaza and neighborhood park and pedestrian and bicycle connections to surrounding neighborhoods will create an inviting destination for new and existing residents. The Plan’s goals for the plaza, park and paths are described in the section of the Plan that presents recommendations related to parks (pages 87-88). Significant residential FAR has been included to allow for mixed-use development and to create the greatest incentive for redevelopment, but redevelopment that does not include a significant commercial component would not be consistent with the Plan. At a minimum, any redevelopment should continue to provide a significant amount of retail, restaurant, and neighborhood services at street level, and additional commercial development is strongly encouraged.

This node – at the intersection of two major east County roads – is a prominent, highly visible location. Redevelopment should establish a new vertical scale with high intensity uses to create a more urban building form that will also improve the pedestrian environment and support BRT. Given that this area is the closest commercial node to the FDA campus, this Plan envisions and encourages redevelopment of this quadrant to take advantage of this location. Redevelopment of both sides of Lockwood Drive could transform this street into a focal point for the area. Redevelopment south of Lockwood Drive would likely require assemblage of some or all of the 13 separately owned parcels. A BRT system and a station located in this node could spur reinvestment in the future. Should redevelopment on the south side of Lockwood Drive occur, a connection to the FDA should be provided (as shown on Figure 2) to create convenient access to this center for campus employees and visitors. If redevelopment occurs,

this Plan recommends that the County initiate discussions with FDA to facilitate the creation of this connection. In addition, connections to the surrounding residential community should be enhanced by a shared use path along Lockwood Drive, Stewart Lane, and Old Columbia Pike (see Figure 2).

### **Residential Properties**

The Plan area has a significant amount of multi-family housing and most of it is concentrated in this node, including the high-rise Enclave Apartments (three 20-story buildings, built in 1966) and White Oak Towers (built in 1981), and garden apartment complexes along Stewart and April Lanes. Newer housing includes the Whitehall Square townhouses (in the R-90 Zone) and the Gatestone townhouses (in the RT-6 Zone), both off Stewart Lane (see Map 8).

Of the 4,500 units in the area, 4,240 are multi-family units and 260 are townhouses. There are 2,709 garden apartment units in the R-20 Zone near the White Oak Shopping Center along Lockwood Drive, Stewart Lane, and April Lane. The Enclave and White Oak Towers buildings are in the R-H Zone and total 1,532 units.

Over 90 percent of the multi-family units in the area are at least 25 years old. Many apartment buildings were constructed in the 1960s, with structures that are now over 45 years old. Much of this housing is considered market affordable, although units are not part of a formal housing subsidy program. In areas with market affordable housing, rents are generally lower than comparable units in other locations in the County, particularly when compared to new construction. In addition to location, units may be market affordable due to demand, neighborhood characteristics, age, physical conditions, and lack of amenities. The County's primary affordable housing program is referred to as Moderately Priced Dwelling Units (MPDUs). The White Oak area does not have any MPDUs because its apartments were built before the MPDU requirements were applied to rental properties. Based on the housing analysis prepared for this Plan, 77 percent of the units in the nine apartment complexes along April-Stewart Lanes are market affordable (see the Appendix).

Several owners of apartment buildings in this area have suggested that some buildings may need extensive renovations or may be reaching the end of their maximum life expectancy, with redevelopment becoming a possibility. Should redevelopment occur, connections in this area should be improved, as shown on Figure 2.

Increasing density and/or changing the zoning from R-20 (a single-use, medium density multi-family zone) to a mixed-use/CR zone poses a risk that potential redevelopment will result in rent increases that reduce or eliminate the number of units that are currently market affordable and will result in displacement. Therefore, the Plan recommends deferring any change in zoning until the Planning Department has completed a comprehensive Countywide study of how to best preserve existing affordable housing in older multi-family housing.

### **Zoning Recommendations**

- Rezone 41 acres of commercial properties on the east side of New Hampshire Avenue, including the 28-acre White Oak Shopping Center and the 13 acres on the south side of Lockwood Drive, from C-2 to CR-2.5, C-1.5, R-1.5, H-200 (see number 1 on Map 7 on

# LABQUEST Partnership

10733 Kinloch Road Silver Spring, MD 20903

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September 22, 2017

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

Re: Proposed Master Plan for U.S. Food and Drug Administration Expanded Consolidation  
at the Federal Research Center, White Oak, Maryland

Dear Mr. Gyamfi,

We appreciate the opportunity to comment on the proposed new Food and Drug Administration (FDA) Master Plan. LABQUEST has serious concerns regarding the urgent FDA need to expand the consolidation of existing staff and accommodate projected growth as proposed in the subject Master Plan update.

The LABQUEST leadership participated in the General Services Administration's (GSA) 12 September Public Scoping Meeting for the proposed new Master Plan. Of the proposed on-campus building options, the only one that gives LABQUEST concern – and one that we would strenuously oppose – is that of the “high-rise” building located at the end of the FDA commons. We believe that when viewed from New Hampshire Avenue, such a building would be totally incongruent overlooking historic Building One, which has been so arduously preserved.

Also, we would hope that any of the expansion options would strive for LEED Gold certifications and include architectural elements matching those of the existing buildings, e.g., the same kind of bricks on the exteriors.

LABQUEST is extremely concerned with the potential crisis arising from the FDA shortfall in staff ‘housing’ in the next several years. This is a critical matter since it is largely accepted that federal budget realities will dictate the “No Build” option at least for the next decade. In that light, LABQUEST strongly supports the GSA initiative to study and develop intermediate

office space solutions to meet these acute FDA space requirements, i.e., leasing initiatives with the private sector.

LABQUEST's general support of the FDA expansion is an extension of our work of many years in support of the original FDA consolidation at White Oak. We have long believed that FDA required a campus with modern buildings and laboratories for the benefit of national and world health and – significantly – to be the catalyst for the economic revitalization of our community as envisioned in the White Oak Science Gateway Master Plan.

Accordingly, LABQUEST strongly believes that the GSA “delineated area” of consideration for the location of additional FDA facilities must be within the boundaries of the White Oak Science Gateway Master Plan.

Indeed, the original congressional mandate was for the consolidation of FDA headquarters on one campus – eventually selected at White Oak – to best support the collaborative nature of FDA's mission. The single-site mandate was reaffirmed by Congress in its FY 2016 appropriation guidance stating that any expansion of FDA headquarters must be at White Oak, either on or “contiguous to” the Federal Research Center.

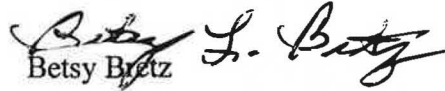
Conversely, any creation of a second FDA campus removed from White Oak would severely impair the FDA mission, among other things, to accelerate biomedical innovation. Moreover, the additional and duplicative recurring costs of such action -- e.g., infrastructure, operations, transportation – would be highly wasteful.

Fortunately, there are sufficiently large parcels of land adjacent to or near the FDA campus that could accommodate FDA expansion for decades to come. This land is relatively inexpensive for the DC area and its availability would promote healthy competition for GSA in achieving cost-effective FDA expansion. Additionally, this land could be developed to allow future locations of private sector national and international biotech collaborators to enhance FDA's mission areas.

The above approach to meeting FDA's expansion needs seems to be the most efficient and cost-effective way to proceed. LABQUEST strongly supports GSA and FDA in implementing this expansion in White Oak. Again, creation of a second campus apart from White Oak would be highly detrimental to FDA's mission, violate congressional mandates, and severely hamper economic revitalization in eastern Montgomery County.

LABQUEST looks forward to continuing our supportive relationship with GSA and working with you on this very important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Betsy L. Bretz". The signature is fluid and cursive, with the first name "Betsy" being larger and more prominent than the last name "Bretz".

Betsy Bretz

Chair, LABQUEST Partnership  
A Public-Private Partnership

## Davis, Jessica

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**From:** Paul Gyamfi - WPDBA <paul.gyamfi@gsa.gov>  
**Sent:** Monday, August 21, 2017 12:16 PM  
**To:** Estes, Liz  
**Subject:** Fwd: new expensive building for fda - why do they need it \_ EXPANSION

FYI  
FDA 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:** **jean public** <[jeanpublic1@gmail.com](mailto:jeanpublic1@gmail.com)>  
**Date:** Sat, Aug 12, 2017 at 10:12 AM  
**Subject:** Re: new expensive building for fda - why do they need it \_ EXPANSION  
**To:** [paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov), [mina.wright@gsa.gov](mailto:mina.wright@gsa.gov), INFO <[INFO@taxpayer.net](mailto:INFO@taxpayer.net)>, media <[media@cagw.org](mailto:media@cagw.org)>, [info@afphq.org](mailto:info@afphq.org), [INFO@njtaxes.org](mailto:INFO@njtaxes.org), [americanvoices@mail.house.gov](mailto:americanvoices@mail.house.gov)

public comment on federal register

i see no reson why more room is needed by the fda when we have a govt that should be downsizing on staff. this operation makes no sense. we have seen the gsa waste our tax dollars massivley in the past. this is jus tmore of the same fat cat swamp bureaucracy of overspending. shu tdown this expensive move. use what you have. its time that this govt stop expanding. taxpayers are not in favor of this move. this comment is for the public record. please receipt. so often moves are made for commutation or some other benefit for the workers, and the taxpayers get stiffed paying for it. the costs are too high at this agency. stop this move. jean publiee [jeanpublic1@gmail.com](mailto:jeanpublic1@gmail.com)

On Fri, Aug 11, 2017 at 2:17 PM, jean public <[jeanpublic1@gmail.com](mailto:jeanpublic1@gmail.com)> wrote:

[Federal Register Volume 82, Number 154 (Friday, August 11, 2017)]

[Notices]

[Pages 37591-37592]

From the Federal Register Online via the Government Publishing Office [[www.gpo.gov](http://www.gpo.gov)]

[FR Doc No: 2017-16945]

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GENERAL SERVICES ADMINISTRATION

[Notice-PBS-2017-01; Docket No. 2017-0002; Sequence No. 4]

Notice of Intent To Prepare an Environmental Impact Statement for the Proposed Master Plan for the Consolidation of the U.S. Food and Drug Administration Headquarters at the Federal Research Center at White Oak, Located in Silver Spring, MD

AGENCY: National Capital Region, General Services Administration (GSA).

ACTION: Notice of intent to prepare an Environmental Impact Statement.

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SUMMARY: Pursuant to the requirements of the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality Regulations, GSA Order, PBS P1095.1F, Environmental Considerations in Decision Making, dated October 19, 1999, and the GSA Public Buildings Service NEPA Desk Guide, GSA plans to prepare an Environmental Impact Statement (EIS) for the proposed Master Plan to support the consolidation of the U.S. Food and Drug Administration (FDA) Headquarters at the Federal Research Center at White Oak, located in Silver Spring, Maryland.

DATES:

Applicable: Friday, August 18, 2017.

[[Page 37592]]

The public scoping meeting date is: Tuesday, September 12, 2017, from 6:30 p.m. to 8:30 p.m., Eastern Daylight Time (EDT).

ADDRESSES: CHI Center, 10501 New Hampshire Avenue, Silver Spring, Maryland 20903.

FOR FURTHER INFORMATION CONTACT: Paul Gyamfi, GSA, National Capital Region, Public Buildings Service, Office of Planning and Design Quality, at [202-440-3405](tel:202-440-3405). Please contact this number if special assistance is needed to attend and participate in the scoping meeting.

SUPPLEMENTARY INFORMATION: GSA intends to prepare an Environmental Impact Statement (EIS) to analyze the potential impacts resulting from the proposed Master Plan to support the FDA Headquarters consolidation at the Federal Research Center (FRC) at White Oak, located in Silver

Spring, Maryland.

## Background

In 1997, GSA completed an EIS that analyzed the impacts from the consolidation of 5,975 FDA employees at the FRC. In 2005, GSA completed a Supplemental Environmental Impact Statement (SEIS) that analyzed the impacts of increasing the number of employees from 5,947 to 7,720 and the impacts of adding a new eastern access entrance point into the FRC. In 2009, GSA completed its second SEIS that analyzed the impacts of increasing the number of employees (from 7,720 to 8,889) needed to conduct the complex and comprehensive reviews mandated by new legislation. To accommodate future growth and further consolidate FDA operations, GSA is preparing an EIS to assess the impacts of an employee population increase, of up to an approximately 18,000 employees, over a period of 15 years.

The purpose of the proposed action is to provide a Master Plan for the FDA Campus at FRC to accommodate the projected growth. The need for the proposed action is to continue to support the FDA Headquarters consolidation at FRC, and provide the necessary office and laboratory space, in order to conduct the complex and comprehensive reviews mandated by Congress.

## Alternatives Under Consideration

GSA will analyze a range of alternatives (including the no action alternative) for the proposed Master Plan of the FDA Headquarters, to increase the campus population by up to an approximately 18,000 employees over 15 years. As part of the EIS, GSA will study the impacts of each alternative on the human environment.

## Scoping Process

In accordance with NEPA, a scoping process will be conducted to aid in determining the alternatives to be considered and the scope of issues to be addressed, as well as for identifying the significant issues related to the proposed Master Plan. Scoping will be accomplished through a public scoping meeting, direct mail correspondence to potentially interested persons, agencies, and organizations, and meetings with agencies having an interest in the Master Plan. It is important that Federal, regional, State, and local agencies, and interested individuals take this opportunity to identify environmental concerns that should be addressed during the preparation of the Draft EIS.

## Public Scoping Meeting

A public scoping meeting will be held on Tuesday, September 12, 2017, from 6:30 p.m. to 8:30 p.m., EDT. The meeting will be an informal open house along with a brief presentation, where visitors may come, receive information, and give comments. GSA is publishing notices in



the Washington Post, Montgomery County Sentinel, and Prince George's Sentinel announcing the meeting.

#### Written Comments

Agencies and the public are encouraged to provide written comments on the scoping issues in addition to, or in lieu of, giving their comments at the public scoping meeting. Written comments regarding the environmental analysis for the proposed Master Plan must be postmarked between Monday, August 21, 2017, and Monday, September 25, 2017, and sent to the following address: General Services Administration, Public Buildings Service, Office of Planning and Design Quality, Attention: Paul Gyamfi, 301 7th Street SW., Room 4004, Washington, DC 20407. Email: [paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov) using the subject line: FDA White Oak Master Plan Comment.

Dated: August 4, 2017.

Mina Wright,

Director, Office of Planning and Design Quality, Public Buildings Service, National Capital Region, General Services Administration.

[FR Doc. 2017-16945 Filed 8-10-17; 8:45 am]

BILLING CODE 6820-Y1-P

**Davis, Jessica**

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**From:** Paul Gyamfi - WPDBA <paul.gyamfi@gsa.gov>  
**Sent:** Monday, August 21, 2017 12:20 PM  
**To:** Estes, Liz  
**Subject:** Fwd: EIS for FDA HQ Consolidation Master Plan  
**Attachments:** FDA HQ Project Site.pdf

FYI  
FDA Comment. I have responded to this gentleman.

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

----- Forwarded message -----

**From:** Paul Gyamfi - WPDBA <[paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov)>  
**Date:** Thu, Aug 17, 2017 at 3:26 PM  
**Subject:** Re: EIS for FDA HQ Consolidation Master Plan  
**To:** "Gutschick, Scott" <[Scott.Gutschick@montgomerycountymd.gov](mailto:Scott.Gutschick@montgomerycountymd.gov)>

Mr. Gutschick,  
Thank you for your interest in this project. The aerial view of the FDA HQ site is attached. Also, the link to the project website is listed below. However, the scoping materials for the September 12, public meeting have not yet been uploaded at the website.

<https://www.gsa.gov/portal/content/166346>

Again thank you.

Paul.

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](tel:(202)6909252)  
Cell: [\(202\) 440 3405](tel:(202)4403405)

On Thu, Aug 17, 2017 at 2:54 PM, Gutschick, Scott <[Scott.Gutschick@montgomerycountymd.gov](mailto:Scott.Gutschick@montgomerycountymd.gov)> wrote:

Mr. Gyamfi:

I have received a copy of the letter from Mary Gibert concerning a request for comments regarding the EIS for the Master Plan of the FDA Headquarters Consolidation at FRC - White Oak. Please advise where the review document can be found. Is there an online link to it? I couldn't find this information in the letter. Thank you.

*Scott A. Gutschick*

*Manager, Planning and Accreditation Section*

*Montgomery County Fire & Rescue Service*

*Public Safety Headquarters*

*100 Edison Park Drive, Floor 2, Room E-09*

*Gaithersburg, MD 20878*

[240-777-2417](tel:240-777-2417) (office)

[240-429-0154](tel:240-429-0154) (cell)

## Davis, Jessica

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**From:** Paul Gyamfi - WPDBA <paul.gyamfi@gsa.gov>  
**Sent:** Monday, August 21, 2017 12:15 PM  
**To:** Estes, Liz  
**Subject:** Fwd: FDA NEPA Scoping

FYI

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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----- Forwarded message -----

**From:** Dan Wilhelm <[djwilhelm@verizon.net](mailto:djwilhelm@verizon.net)>  
**Date:** Sat, Aug 19, 2017 at 9:30 AM  
**Subject:** FDA NEPA Scoping  
**To:** [paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov)

Paul:

I will attend the meeting on Sept 12 but since I have another meeting at 7:30, I will be able to attend only the first 45 minutes. Is there any material on-line?

Also, please update your records to reflect that I am the current president of the Greater Colesville Citizens Association. The address is unchanged.

Dan Wilhelm

[301-384-2698](tel:301-384-2698)

## Davis, Jessica

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**From:** Paul Gyamfi - WPDBA <paul.gyamfi@gsa.gov>  
**Sent:** Tuesday, September 26, 2017 10:33 AM  
**To:** Estes, Liz; Davis, Jessica; Shelly Jones - WPDBA  
**Subject:** Fwd: FDA HQ EIS  
**Attachments:** connectiontoFDA.JPG; WhiteOakGuidelines.JPG; ParkStaffReport.JPG

FDA EIS Comments

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  
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Cell: (202) 440 3405

----- Forwarded message -----

**From:** Eileen Finnegan <[finnegan20903@yahoo.com](mailto:finnegan20903@yahoo.com)>  
**Date:** Mon, Sep 25, 2017 at 9:00 PM  
**Subject:** FDA HQ EIS  
**To:** Paul Gyamfi <[paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov)>  
**Cc:** Shelly Jones - WPDBA <[shelly.jones@gsa.gov](mailto:shelly.jones@gsa.gov)>

Hello Mr. Gyamfi,

In accordance with the paper edition of "Public Scoping for the FDA Consolidation at the Federal Research Center at White Oak," I request that I receive a CD copy of the EIS when it is available, and that I receive information on any upcoming projects at the Federal Research Center at White Oak. Thank you.

I also would like to provide the following comments/requests regarding the project:

1. Consolidating the FDA on an expanded FDA Campus at the FRC not only uses a federal land asset, it will achieve the long-sought goal of having an integrated, common environment for this important agency located on New Hampshire Ave. I urge GSA to move forward with this Master Plan Update and follow quickly with funding requests to complete the full consolidation on the White Oak Campus.

2. Please make the FDA Campus more accessible to the White Oak community by adding a secure gate/passageway from Lockwood Drive. Montgomery County's 2014 White Oak Science Gateway Master Plan calls for this White Oak/FDA connection. Having a pedestrian passage would greatly improve the access to nearby commercial and residential areas. Hopefully some FDA employees, or contractors, would be able to "walk to work" and others on campus might consider doing business in White Oak without having

to relinquish their parking space. Improving this interaction is an economic imperative to a deserving area. See the attached snippet from page 39 of the plan at this link: [http://www.montgomeryplanning.org/community/wosg/documents/approved\\_and\\_adopted\\_final.pdf](http://www.montgomeryplanning.org/community/wosg/documents/approved_and_adopted_final.pdf)

3. Please consider having this White Oak/FDA connection include transit passage. Given the now-proposed Transit Center on the Northwest Loop Road, having the New Hampshire Bus Rapid Transit and Ride-On services travel directly to/from Lockwood and the White Oak Transit Center to/from FDA would improve transit time and efficiency for all. Looping around via NH is not efficient.

4. The Hillandale Volunteer Fire Department property is very constrained and needs land to expand, improve parking and facilitate equipment circulation. Please consider providing land to the HVFD so improvements can be made. This station is the first response fire service to the FDA Campus.

5. The Hillandale Local Park is also constrained. Currently the park is undergoing a full renovation due to be completed in 2020-21. Because of environmental buffers, there is insufficient land to complete desired sport fields. Please consider supplying, or no-cost leasing land along the southern fence to M-NCPPC for soccer fields. For more on the park plan, attached is a snippet from the 2015 staff report. The full report is at: [http://www.montgomeryplanningboard.org/agenda/2015/documents/item7Attachment2\\_000.pdf](http://www.montgomeryplanningboard.org/agenda/2015/documents/item7Attachment2_000.pdf)

I also have questions regarding the project:

1. How will the recommendations made in the recent GAO report be implemented? Will any fixes mandated be undone with this new Master Plan?

2. Are FDA Transportation Management Reports available for public review?

3. Since the FDA Housing Study is underway, will off-site leasing delay the completion of the White Oak Campus, or will any off-site leasing be short-term and be aimed at facilitating consolidation? Will this study be released when completed, or wait the final EIS?

4. What are the scoring rules for leasing vs building FDA facilities? The House Transportation and Infrastructure Committee is firm in promoting government-owned federal facilities. Is GSA consulting with this important committee on how to achieve the FDA Master Plan build out?

5. FDA has paid many, many millions of dollars to GSA's Federal Building Fund. How is this funding accessed to add to the infrastructure at White Oak? Can money be appropriated for parking garages now?

6. The child care center reportedly has an agreement with the CHI Centers to have children use CHI as an evacuation location. Is there a plan as to how any evacuation would occur? Is a connection between the child care center and the renovated Hillandale Local Park being considered?

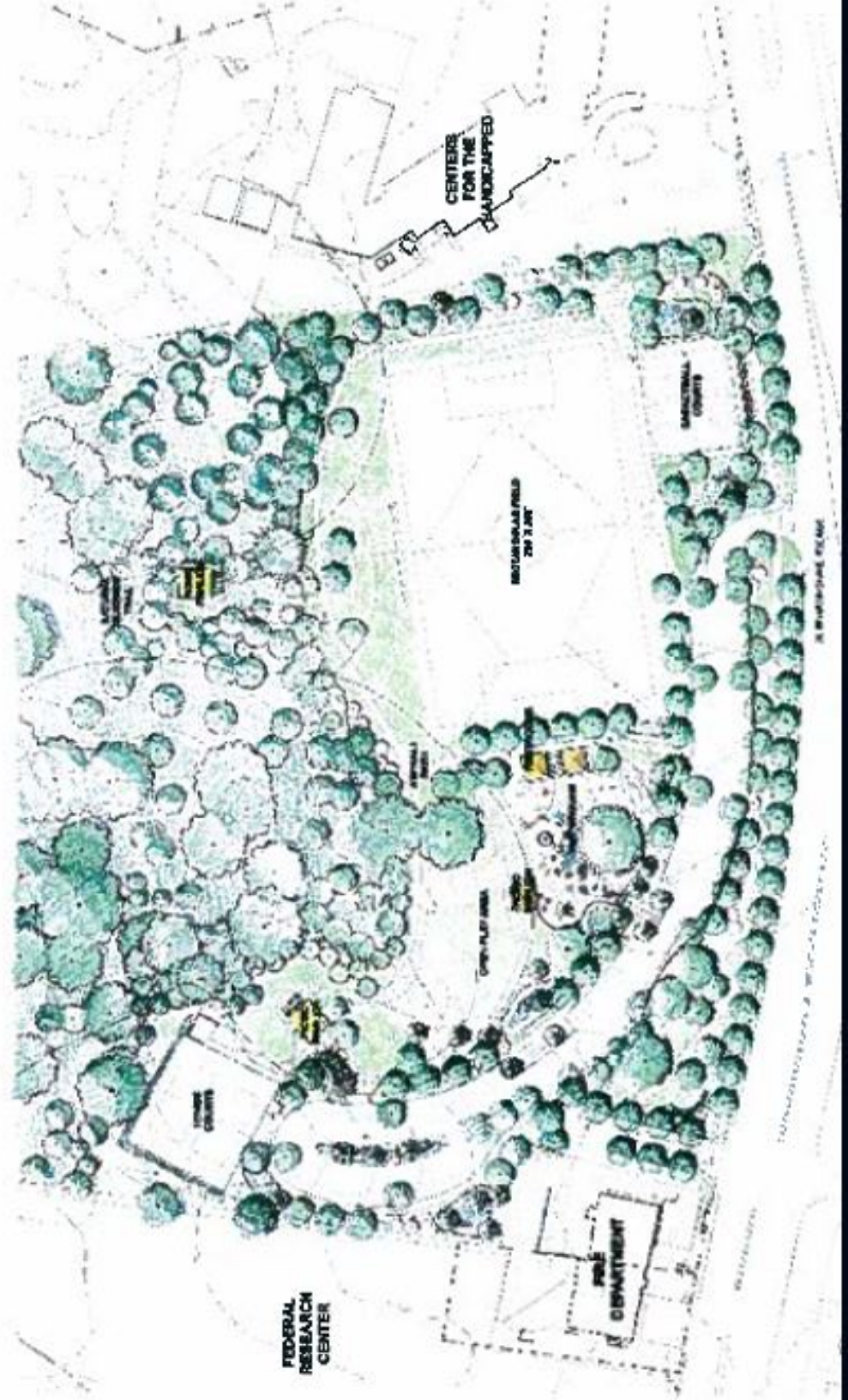
7. Does the power generation facility have capacity for the full expansion? Will this be evaluated in this EIS?

Thank you for the opportunity to comment on the EIS.

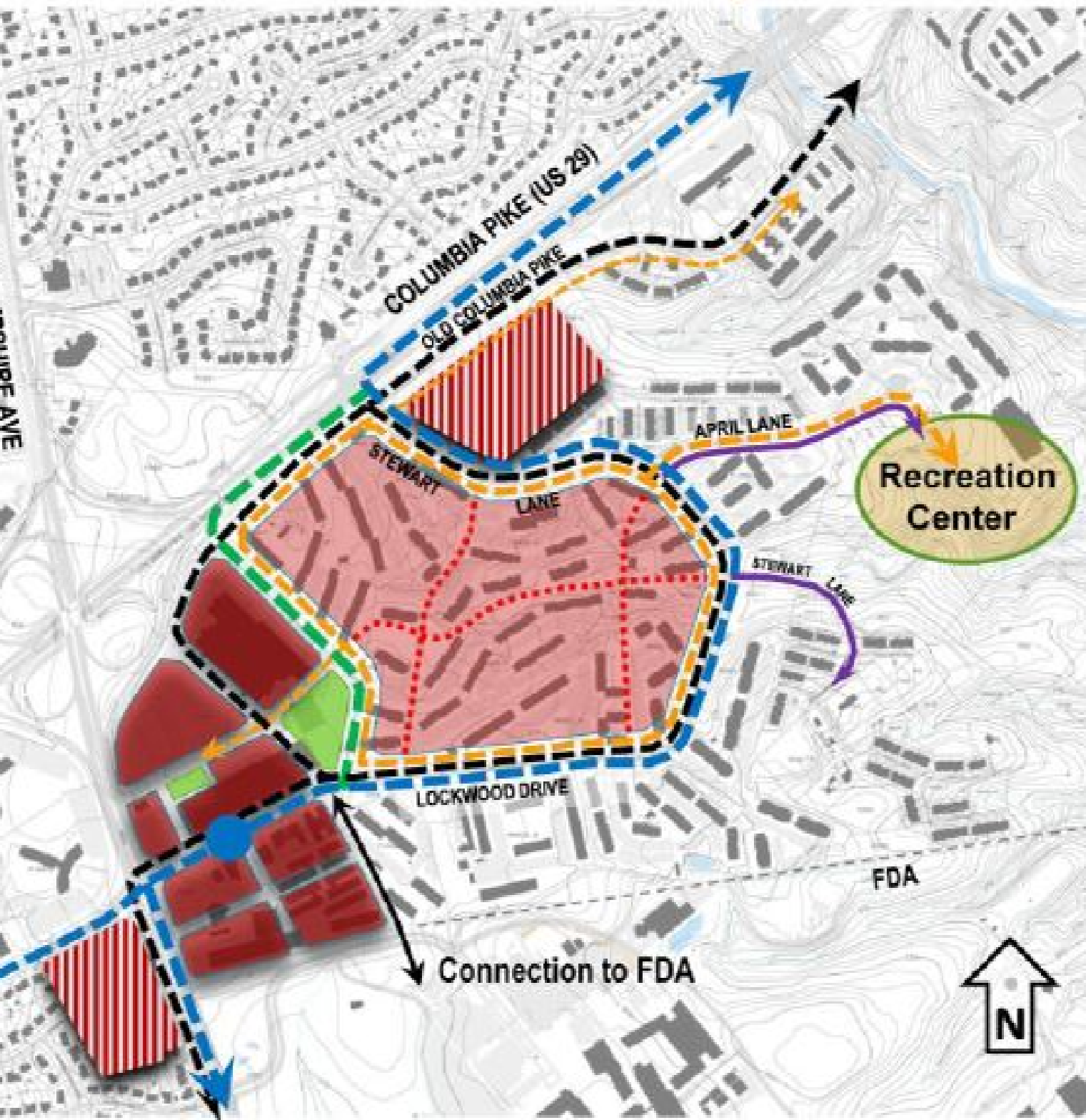
Regards,  
Eileen Finnegan  
[10404 Sweetbriar Parkway](#)  
[Silver Spring, MD 20903](#)  
[301-439-2263](#)

U.S. General Services Administration (GSA) / Federal Research Center (FRC)

staff had numerous phone conversations with GSA and FRC staff regarding the possibility of converting a diamond field on the GSA property along the New Hampshire frontage. Initially GSA staff were supportive of the idea, noting that the facility would also be used by FRC employees. Despite efforts by park staff, communications have since stalled and have not proceeded further. Staff will continue to pursue this option in the interval between planning and design. The park design is able to accommodate a diamond overlay on the soccer field should it be considered necessary and desirable in the future.



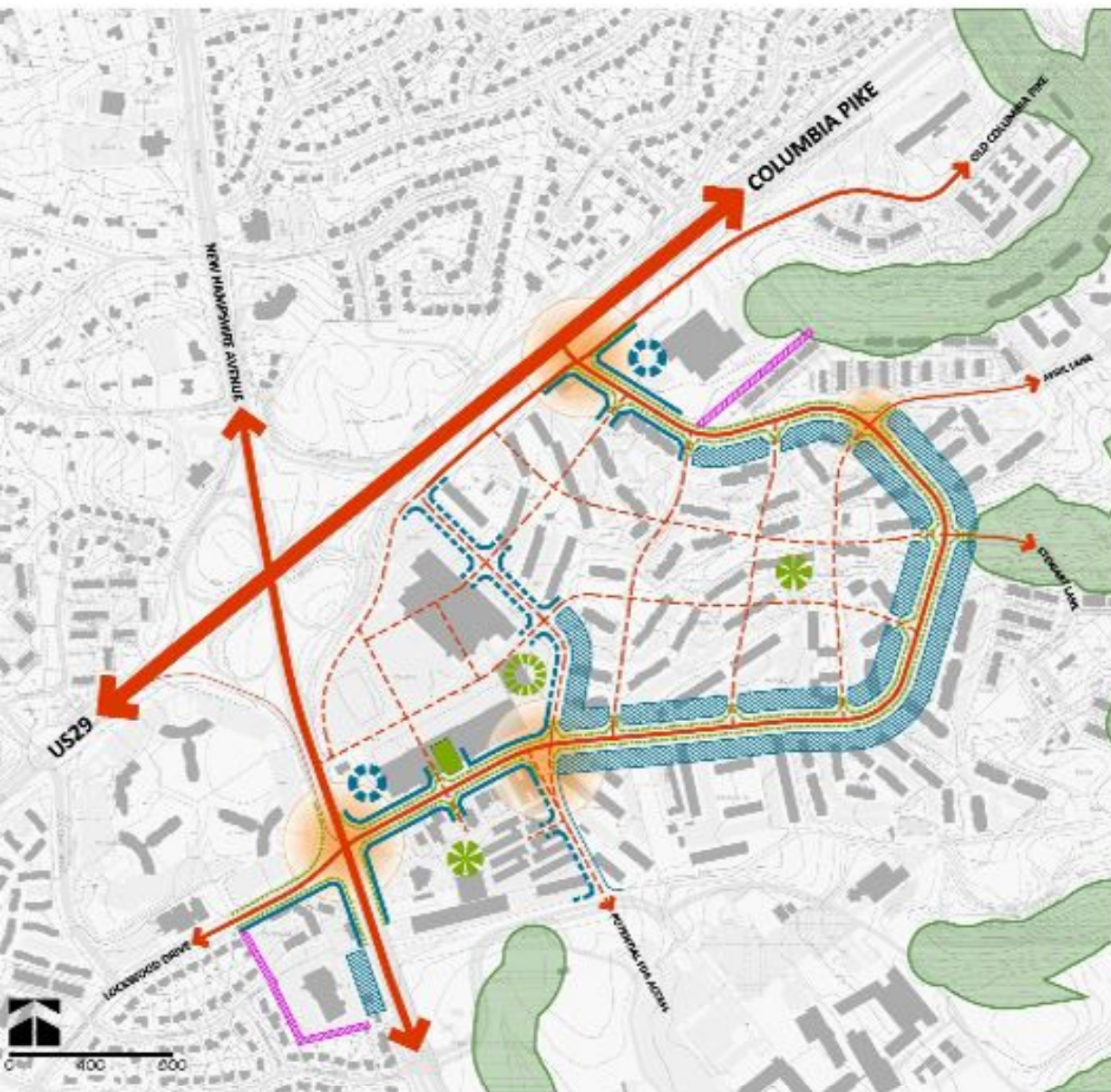
## 2 White Oak Center Illustrative Concept



- Proposed BRT with Possible Station Location
- Alternate BRT Alignment
- Existing Road
- Potential Road
- Connection to FDA
- Proposed Circulator
- Shared Use Path
- Mixed-use development
- Transitional development
- Potential re-development
- Major Open Space







## Legend

- Existing Road
- - - Potential Road
- Build-to-line
- - - Potential Build to line
- ▨ Build-to-area
- ⋯ Streetscape
- ▨ Transition Area
- █ Environmental Area (\*)
- █ Urban Plaza
- Proposed Park
- ★ Potential Open Space
- Landmark | Gateway Structure
- Enhanced Intersection

(\*) Delineation of environmentally sensitive areas is shown for illustrative purposes. Actual extent of environmental buffers will be established during the regulatory review process.

## Guidelines for Specific Centers

### White Oak Center

The existing commercial area of White Oak is prominent and easy to see from several vantage points. It also has strong potential for a direct connection with the core of the Food and Drug Administration (FDA) campus. The commercial center includes the White Oak Shopping Center, several office buildings, and ancillary retail. This center's high visibility, at the intersection of two major roads (US 29 and New Hampshire Avenue) with existing high rise apartments, suggests that higher density and taller building heights could be located here. Redevelopment should establish a new vertical scale with high intensity uses, to improve the area for pedestrians and create support for the proposed BRT system, which may have two lines converging around the center. Redevelopment could also encourage reinvestment for the enhancement of immediately adjacent residential communities.

## Davis, Jessica

---

**From:** Paul Gyamfi - WPDBA <paul.gyamfi@gsa.gov>  
**Sent:** Wednesday, September 13, 2017 12:06 PM  
**To:** Estes, Liz; Davis, Jessica  
**Subject:** Fwd: Comments on FDA Master Plan  
**Attachments:** ULI Montgomery County PRESENTATION 5-17 FINAL.pdf

Comments for FDA EIS

FYI

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:** Barry Wides <[barrywides@hotmail.com](mailto:barrywides@hotmail.com)>  
**Date:** Tue, Sep 12, 2017 at 10:52 PM  
**Subject:** Comments on FDA Master Plan  
**To:** "[paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov)" <[paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov)>  
**Cc:** "Fosselman, Peter C." <[Peter.Fosselman@montgomerycountymd.gov](mailto:Peter.Fosselman@montgomerycountymd.gov)>

Dear Mr. Gyamfi:

I am writing in my capacity as President of the North White Oak Civic Association, which represents 500 families living in the community bounded by US 29, New Hampshire Avenue, and the Martin Luther King Park. I would like to provide comments on the FDA Master Plan which was the subject of a public meeting this evening.

Our community's recommendation regarding the Master Plan is that the GSA identify ways to ensure security of the facility, but also provide public access to portions of the perimeter of the property for hiking/biking trails. This is a recommendation that was made as part of the Urban Land Institute study prepared for Montgomery County (see attached).

A similar approach was taken with respect to the perimeter of the National Institutes of Health (NIH) in Bethesda. The NIH campus on the west side of Wisconsin Avenue has a 330 foot wide perimeter park that extends from near Battery Lane to Old Georgetown Road (about 1/2 mile). This park includes a bike trail. This park provides open space for NIH staff members to enjoy, as well as a convenient way for the public to navigate this large tract of land in the residential Bethesda neighborhood.

In order to facilitate the growth and vibrancy of the future Viva White Oak, the FDA needs to find ways to provide greater east/west access for the White Oak Science Gateway Community from New Hampshire Avenue to FDA Boulevard. This could entail moving the security fence on the northern portion of the FDA campus south by 50 to 100 feet, and repaving Perimeter Road in order to provide that east/west access.

We would also recommend that FDA develop trails into the Paint Branch on the GSA portion of property. This could provide FDA employees and other members of the public access to this beautiful natural resource.

Thank you for your consideration of our views.

Sincerely,

Barry Wides  
President, North White Oak Civic Association  
11803 Ithica Drive  
Silver Spring, MD 20904

---

**From:** Fosselman, Peter C. <[Peter.Fosselman@montgomerycountymd.gov](mailto:Peter.Fosselman@montgomerycountymd.gov)>

**Sent:** Wednesday, May 24, 2017 12:52 PM

**Cc:** Bandeh, Jewru; Ossont, Greg; Donin, Amy

**Subject:** ULI TAP Draft Document

Hot off the presses. The team will be meeting again in June with Urban Land Institute internally to fine tune it all.

Thanks for your help and input during the process! And special thank you to the ULI Staff for guiding us; and the Amalgamated Transit Union for being our host.

Amy, Greg, Jewru & Pete

***Peter Fosselman***  
*Planning Coordinator,*  
*White Oak Science Gateway Master Plan*  
***Office of the County Executive***  
*101 Monroe Street, 2nd Floor*  
*Rockville, Maryland 20850*  
***Eastern Montgomery Regional Services Center***  
*3300 Briggs Chaney Road*  
*Silver Spring, MD 20902*  
*(240) 997-6989*

## Davis, Jessica

---

**From:** Paul Gyamfi - WPDBA <paul.gyamfi@gsa.gov>  
**Sent:** Thursday, September 14, 2017 2:16 PM  
**To:** Estes, Liz; Davis, Jessica  
**Subject:** Fwd: FDA Master Plan

Comments for FDA EIS

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:** **sandy kozak** <[sandykozak@hotmail.com](mailto:sandykozak@hotmail.com)>  
**Date:** Thu, Sep 14, 2017 at 2:11 PM  
**Subject:** FDA Master Plan  
**To:** "[paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov)" <[paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov)>

Howdy Neighbor!

Transportation impacts need to be better addressed. Previous studies decided that since the area is currently rated at "failure" levels due to the already overly used roads and intersections that adding another 18K users won't change the rating so this is fine.

It is not.

Just because the rating system makes no further distinction, the reality is that there is a huge distinction that greatly effects the quality of life in the neighborhood, including your employees.

More parking spaces, while needed, does nothing to address this issue.

I am glad to hear an additional shuttle service will be set in place at the Shady Grove Metro station. I would like to see further actions like this.

I also support the development being as concentrated as possible in the current area.

As it stands there is a wooded buffer zone between the development and the Hillandale neighborhood, literally in my backyard. We were promised that this wooded buffer zone would remain intact. I hold you to that promise.

We were also promised that the existing dirt perimeter road which is used by a multitude of staff as a fitness walk/run would be replaced by an alternative path that FDA would create in 2017. Time is running out. What happened to this promise?

The traffic on this perimeter road creates a great disturbance to those of us located adjacent to it. Our homes are built so that they are only 25 feet away from this road. The noise is startling, it often sounds as if someone with a very loud voice has entered my home! The traffic is continuous throughout the day. Some prefer early morning walks or jogs, lunchtime breaks at all morning or afternoon hours, or after work exercise. It even occurred on weekends until a long sought meeting with FDA personnel was finally arranged and staff made aware of the weekend use and this occurrence has thankfully stopped.

I'm pretty sure you would also consider this a pertinent problem if it occurred at your home. We would welcome staff to use our neighborhood **streets** for their fitness breaks. Perhaps access to our **public** areas can be made for this purpose.



Smarter Solutions

### Environmental Impact Statement for the FDA Consolidation at the Federal Research Center at White Oak Public Scoping Meeting

#### Comment Sheet and Questionnaire

Name: Tina Hochbers  
 Address: 2106 Edgewater Pkwy.  
Silver Spring MD 20903  
 Affiliation: Live in Hillandale Neighborhood  
 Phone: 301-445-5253

Do you know of any environmental issues that would arise from this action?

The site ~~had~~ had been home to substantial wildlife populations that have been affected by the current buildout including losing bats that are suffering anyway from the fungus going thru the population - more wildlife will have habitat disappear from additional building.

Do you know of any special interest groups that would be affected by this action?

NO

Would you like to receive an electronic copy on CD of the Environmental Impact Statement for this action when it becomes available? NOTE: Paper copies will be available at local libraries and at GSA.

Yes

No

Would you like to continue to receive information on upcoming projects at the Federal Research Center at White Oak?

Yes

No

**More on back**



General Services Administration  
National Capital Region

Please provide additional comments on the update of the Master Plan:

There are a couple of houses that used to be commander housing on the edge of the property bordering the Hillandale neighborhood - at one time the gates separating these properties was open to the neighborhood - Those houses are being neglected and it looks like they are not part of the new plans either why not sell that property to a housing developer to add to the Hillandale neighborhood & move back the FDR property line.

Depending on the density of the housing development, townhouses perhaps, it could also contribute to housing of FDR employees cutting down transportation needs - New Hampshire Ave is strained as it is -

Please send comments to:

**U.S. General Services Administration**  
**Attention: 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



Smarter Solutions

**Environmental Impact Statement for the  
FDA Consolidation at the Federal Research Center at White Oak  
Public Scoping Meeting**

**Comment Sheet and Questionnaire**

Name: Rob RICHARDSON  
Address: 716 Edelblut Drive  
S-S- MD 20901  
Affiliation: LARQUEST  
Phone: 301-593-5347

Do you know of any environmental issues that would arise from this action?

None

Do you know of any special interest groups that would be affected by this action?

The Health of the Nation

Would you like to receive an electronic copy on CD of the Environmental Impact Statement for this action when it becomes available? NOTE: Paper copies will be available at local libraries and at GSA.

Yes  No

Would you like to continue to receive information on upcoming projects at the Federal Research Center at White Oak?

Yes  No

**More on back**



General Services Administration  
National Capital Region



Please provide additional comments on the update of the Master Plan:

- ① Strongly support expansion of FDA mission AND facilities in the White Oak community. It is a driver for economic development in Eastern Montgomery County.
- ② Believe that the tallest building under consideration is too tall in appearance behind the historic Bulfinch #1.
- ③ Additional numbers of employees will not cause additional traffic issues if well managed.

Please send comments to:

**U.S. General Services Administration**  
**Attention: 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



## Environmental Impact Statement for the FDA Consolidation at the Federal Research Center at White Oak Public Scoping Meeting

### Comment Sheet and Questionnaire

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Affiliation: \_\_\_\_\_

Phone: \_\_\_\_\_

Do you know of any environmental issues that would arise from this action?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Do you know of any special interest groups that would be affected by this action?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Would you like to receive an electronic copy on CD of the Environmental Impact Statement for this action when it becomes available? NOTE: Paper copies will be available at local libraries and at GSA.

Yes  No

Would you like to continue to receive information on upcoming projects at the Federal Research Center at White Oak?

Yes  No

**More on back**



Please provide additional comments on the update of the Master Plan:

Main Concerns

Traffic Congestion which affects  
Colesville Rd (29) and Cherry Hill Rd.  
With the building of Viva White Oak and  
expansion to FDA, What additional access  
to other roads is proposed.

I am always concerned ~~about the~~ and  
hope there is minimal change to the  
environment.

J. Sands

Please send comments to:

**U.S. General Services Administration**  
**Attention: 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

**Environmental Impact Statement for the  
FDA Consolidation at the Federal Research Center at White Oak  
Public Scoping Meeting**

**Comment Sheet and Questionnaire**

Name: Davis Dammus  
 Address: 1258 Congressional Drive  
Silver Spring, MD 20905  
 Affiliation: Eyes of Paint Branch  
 Phone: 301-674-1382

Do you know of any environmental issues that would arise from this action?

*Yes. This site spans the Paint Branch tributary. Much time, money, and effort has been put into protecting the stream, at local, state, and federal levels. It would be good if impervious surface area is used as a metric for*

Do you know of any special interest groups that would be affected by this action?

*assessing options and evaluating alternatives. Imperviousness is used by other agencies on other projects in the watershed and is well known and understood by those involved.*

(OVER)

Would you like to receive an electronic copy on CD of the Environmental Impact Statement for this action when it becomes available? NOTE: Paper copies will be available at local libraries and at GSA.

Yes                       No

Would you like to continue to receive information on upcoming projects at the Federal Research Center at White Oak?

Yes                       No

**More on back**

Please provide additional comments on the update of the Master Plan:

There isn't much unused area to accommodate stormwater facilities, which will be increasing important to mitigate the impacts of any additional development. Safeway in Clonerly and the ICC both incorporated underground storage of stormwater in their projects. This saves space as well as cools the hot runoff and prevents solar warming.

Many residents use the trails along the Paint Branch for recreation and solitude. The FDA site is fenced across the stream presently, although it may be possible to provide stream-side hiking/walking access by fences along the east side and west side of the stream, and still keep the integrity of the FDA site intact, as well as the wind tunnel and Army Research Lab.

You need to explicitly recognize the special nature of the Paint Branch up front in detail. The potential impacts to the Paint Branch need to be considered in this study.

Please send comments to:

**U.S. General Services Administration**  
**Attention: 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



### Environmental Impact Statement for the FDA Consolidation at the Federal Research Center at White Oak Public Scoping Meeting

#### Comment Sheet and Questionnaire

Name: Kathryn Hopps  
 Address: 10513 Greenacres Drive  
Silver Spring, MD 20903  
 Affiliation: Hillandale resident, VMD instructor for 3 FDA interns  
 Phone: 301 509-8769

Do you know of any environmental issues that would arise from this action?

increased air pollution  
additional erosion and water pollution

Do you know of any special interest groups that would be affected by this action?

All the residents of Montgomery County, nearby  
Prince George's County, and bay communities

Would you like to receive an electronic copy on CD of the Environmental Impact Statement for this action when it becomes available? NOTE: Paper copies will be available at local libraries and at GSA.

Yes                       No

Would you like to continue to receive information on upcoming projects at the Federal Research Center at White Oak?

Yes                       No

**More on back**

Please provide additional comments on the update of the Master Plan:

I hope development plans will mitigate the environmental impact by: 1) incorporating green roof design, 2) incorporate other LEED architectural features, favor multi-story parking structure over asphalt, 3) maximize retention of trees and green space.

I hope employees will be charged for parking (as we are at the University of Maryland) but given discounts for carpooling, and that use of public transportation will be subsidized. I hope the FDA will support bus rapid transit on the New Hampshire corridor.

I see many positive impacts of FDA consolidation. I have UMD students who are Montgomery County residents and have had beneficial internships at the FDA White Oak campus. Consolidation has encouraged local restaurant and hotel development we residents view positively. We would like to see more, wisely planned, consolidation, with a view to traffic remediation, environmental impact and maintaining the residential ambience of surrounding neighborhoods.

Please send comments to:

**U.S. General Services Administration**

**Attention: 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



Smarter Solutions

### Environmental Impact Statement for the FDA Consolidation at the Federal Research Center at White Oak Public Scoping Meeting

#### Comment Sheet and Questionnaire

Name: Myrna Frank  
 Address: 10510 Sweetbriar Parkway  
Liberty Spic 20907  
 Affiliation: Hillandale resident  
 Phone: myrnafrank@verizon.net

Do you know of any environmental issues that would arise from this action?

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Do you know of any special interest groups that would be affected by this action?

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Would you like to receive an electronic copy on CD of the Environmental Impact Statement for this action when it becomes available? NOTE: Paper copies will be available at local libraries and at GSA.

Yes  No

Would you like to continue to receive information on upcoming projects at the Federal Research Center at White Oak?

Yes  No

**More on back**



General Services Administration  
National Capital Region



Please provide additional comments on the update of the Master Plan:

• Access by the neighbors to walk/bike paths?  
(Not it's like you have great ice cream & we can't have any). 😊

• Impact on traffic which is increasing heavier bc large # of FRA employees.

• Incentives for eateries/restaurants in this vicinity?

Please send comments to:

**U.S. General Services Administration**

**Attention: 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

# APPENDIX B – Wetland Investigation Report

# US Food and Drug Administration Federal Research Center Master Plan

## WETLAND INVESTIGATION REPORT



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Prepared for:  
General Services Administration (GSA)  
301 7th Street, SW  
Washington, DC 20407

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Submitted by:  
Stantec Consulting Services Inc.  
6110 Frost Place  
Laurel, Maryland 20707

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September 2017

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1 **Table of Contents**

2 Introduction..... 1

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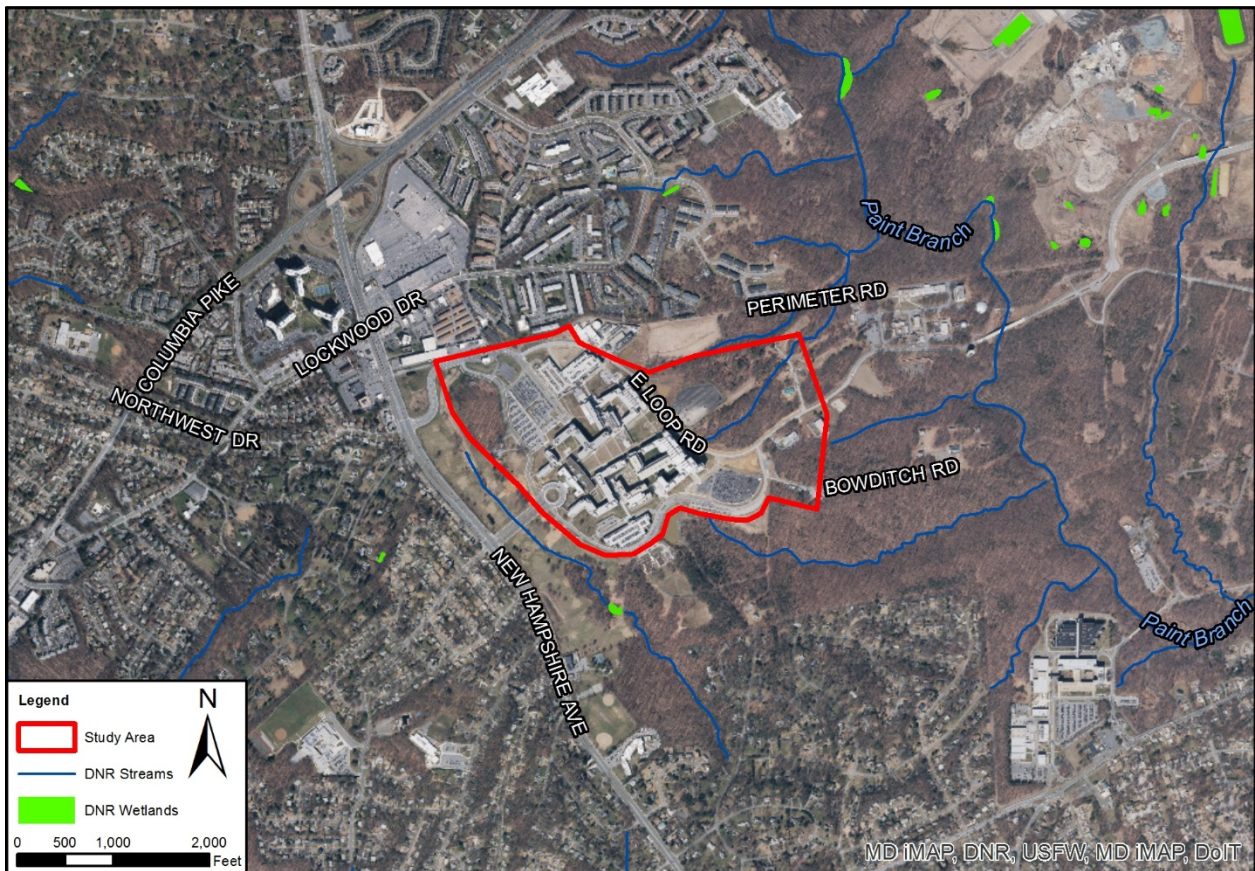
8 Attachment 1 – Wetland Delineation Maps

9 Attachment 2 – Wetland Delineation Data Sheets

10 Attachment 3 – Site Photographs

1 **Introduction**

2 The U.S. General Services Administration (GSA) is preparing an Environmental Impact Statement  
 3 (EIS) to analyze the potential impacts resulting from the US Food and Drug Administration (FDA)  
 4 Consolidation at the Federal Research Center (FRC) at White Oak Master Plan, located in Silver  
 5 Spring, Maryland. In support of this EIS, Stantec Consulting Services Inc. (Stantec) conducted an  
 6 investigation on July 17, August 1, and August 2, 2017, to determine the presence, extent, location,  
 7 and classification of any waters of the United States, including wetlands, or waters of the State  
 8 located within or adjacent to the study area provided by GSA. The study area is shown on **Figure 1**  
 9 below. This report summarizes the results of the investigations.



10 **Figure 1. Vicinity Map**

11 **Methodology**

12 Impacts to waters of the United States, including wetlands, are regulated under Section 404 of the  
 13 Clean Water Act by the U.S. Army Corps of Engineers (USACE) and the Environmental Protection  
 14 Agency (EPA). The Maryland Department of the Environment (MDE) regulates these resources as  
 15 well as waters of the State, which includes the 100-year floodplain, wetlands (including isolated  
 16 wetlands), wetland and stream buffers, and intermittent and perennial streams.

## 1 **Waters of the US**

2 The USACE asserts jurisdiction over the following waters:

- 3 • Traditionally navigable waters (TNWs);
- 4 • Interstate waters;
- 5 • Wetlands adjacent to either TNWs or interstate waters;
- 6 • Non-navigable tributaries to traditional navigable waters that are relatively permanent,  
7 meaning they contain water at least seasonally; and
- 8 • Wetlands that directly abut relatively permanent waters.

9 Streams are described by one of three classifications. Perennial streams flow continuously during the  
10 year, due to groundwater discharge and surface runoff. Intermittent streams intercept the water  
11 table for at least some part of the year, or the drainage area of the channel is at least one square mile.  
12 Ephemeral streams flow in response to precipitation events or the melting of snow and ice.

13 Waterways within the study area are unnamed tributaries of Paint Branch located within the  
14 Anacostia River watershed (MDE 02-14-02-05). Paint Branch and its tributaries upstream of the  
15 Capital Beltway (I-495) are designated as Use III (Nontidal Cold Water) waterways by the State of  
16 Maryland and include a stream closure period of October 1st through April 30th.

## 17 **Wetlands**

18 Wetlands were investigated following the procedures detailed in the *Corps of Engineers Wetlands*  
19 *Delineation Manual* (Environmental Laboratory, 1987), the *Regional Supplement to the Corps of*  
20 *Engineers Wetlands Delineation Manual: Atlantic and Gulf Coastal Plain Region Version 2.0*  
21 (USACE, 2010), and all subsequent guidance and clarifications.

22 The Regional Supplement utilizes a three-parameter approach to identifying wetlands, which  
23 includes the presence of dominant hydrophytic vegetation, hydric soils, and wetland hydrology. All  
24 three parameters must be present under normal circumstances for an area to be considered a  
25 wetland. Specific sections of the 1987 Manual that are replaced by the supplement include  
26 Hydrophytic Vegetation Indicators; Hydric Soil Indicators; Wetland Hydrology Indicators; and  
27 Growing Season Definition. Most of the wetland indicators presented in the Regional Supplement  
28 are applicable throughout the entire Atlantic and Gulf Coastal Plain Region. However, some  
29 indicators are applicable only to land resource regions (LRRs) or major land resource areas  
30 (MLRAs). The study area is located within the Northern Coastal Plain (MLRA 149A) of LRR S. The  
31 following discussion of the soils, vegetation, and hydrology parameters is based on the Regional  
32 Supplement.

### 33 *Hydrophytic Vegetation*

34 Hydrophytic vegetation is present when the plant community is dominated by species that can  
35 tolerate prolonged inundation or soil saturation during the growing season. Hydrophytic vegetation  
36 decisions are based on the wetland indicator status of species that make up the plant community as  
37 provided by the National Wetland Plant List (USACE, 2016). The following is an explanation of the  
38 indicator status designations:

- 1 OBL: Obligate Wetland (> 99% probability of occurrence in wetland)
- 2 FACW: Facultative Wetland (66 to 99% probability of occurrence in wetland)
- 3 FAC: Facultative (33 to 66% probability of occurrence in wetland)
- 4 FACU: Facultative Upland (1 to 33% probability of occurrence in wetland)
- 5 UPL: Obligate Upland (< 1% probability of occurrence in wetland)

6 The rapid test for hydrophytic vegetation (Indicator 1) is the first field test to evaluate vegetation and  
7 to determine if there is a need to collect more detailed vegetation data. The rapid test for hydrophytic  
8 vegetation is met if all dominant species across all strata are OBL or FACW, or a combination of the  
9 two, based on a visual assessment. If the site is not dominated solely by OBL or FACW species, the  
10 dominance test (Indicator 2) is performed, which is the basic hydrophytic vegetation indicator.  
11 Wetland areas in the coastal plain that pass the dominance test are considered to support  
12 hydrophytic vegetation. Plant communities that fail the test based only on dominant species, but  
13 support indicators of hydric soil and wetland hydrology, are re-evaluated with the prevalence index  
14 (Indicator 3), which takes non-dominant plant species into consideration. The following system,  
15 which divides the vegetation community into four strata, was used to evaluate the vegetation  
16 parameter:

- 17 1. Tree stratum – Consists of woody plants, excluding vines, approximately 20 feet or more in  
18 height and 3 inches or larger in diameter at breast height (DBH).
- 19 2. Sapling stratum – Consists of woody plants, excluding vines, approximately 20 feet or more in  
20 height and less than 3 inches DBH.
- 21 3. Shrub stratum – Consists of woody plants, excluding vines, approximately 3 to 20 feet in  
22 height.
- 23 4. Herb stratum – Consists of all herbaceous (non-woody) plants, including herbaceous vines,  
24 regardless of size, and woody species, except woody vines, less than 3 feet in height.
- 25 5. Woody vines – Consists of all woody vines, regardless of height.

### 26 *Hydric Soils*

27 Hydric soils are defined as soils that formed under conditions of saturation, flooding, or ponding  
28 long enough during the growing season to develop anaerobic conditions in the upper part (Federal  
29 Register, 1994). Hydric soil indicators are formed predominantly by the accumulation or loss of iron,  
30 manganese, sulfur, or carbon compounds in a saturated and anaerobic environment. These processes  
31 and the features that develop are varied, but are reflected most often in soil color, presence of  
32 redoximorphic (redox) features such as redox depletions, and redox concentrations. Other  
33 indicators of hydric soils include sulfate reduction and the accumulation of organic material.

1 The USDA Natural Resources Conservation Service maintains a list of hydric soils throughout the  
 2 country. To determine if the study area contains hydric soils, GIS mapping and data for Montgomery  
 3 County was obtained from the NRCS Web Soil Survey (USDA, 2017). A summary of soils within the  
 4 study area is provided in **Table 1**. No soils in the study area consist of greater than 10 percent hydric  
 5 components.

6 **Table 1: Summary of Soil Map Unit Classifications in the Study Area**

Map Symbol	Soil Series	Hydric Soil Component	Component Percent
2C	Glenelg silt loam, 8-15% slopes	None	0
16D	Brinklow-Blocktown channery silt loams, 15-25% slopes	Baile	5
58B	Sassafras loam, 2-5% slopes	Fallsington-Drained	0-10
58C	Sassafras loam, 8-15% slopes	None	0
61B	Croom gravelly loam, 3-8% slopes	None	0
61C	Croom gravelly loam, 8-15% slopes	None	0
61D	Croom gravelly loam, 15-25% slopes	None	0
67UB	Urban land-Wheaton complex, 0-8% slopes	Baile	5
116D	Blocktown channery silt loam, 15-25% slopes, very rocky	Baile	5
116E	Blocktown channery silt loam, 25-45% slopes, very rocky	Baile	5
400	Urban land	None	0

7 *Wetland Hydrology*

8 Wetland hydrology indicators provide evidence that a site has a continuing wetland hydrologic  
 9 regime and that hydric soils and hydrophytic vegetation are not relics of a past hydrologic regime.  
 10 The Regional Supplement describes wetland hydrology indicators in four groups. Indicators in  
 11 Group A are based on the direct observation of surface water or groundwater during a site visit.  
 12 Group B consists of evidence that the site is subject to flooding or ponding, although it may not be  
 13 inundated currently. These indicators include water marks, drift deposits, sediment deposits, and  
 14 similar features. Group C consists of other evidence that the soil is saturated currently or was  
 15 saturated recently. Some of these indicators, such as oxidized rhizospheres surrounding living roots  
 16 and the presence of reduced iron or sulfur in the soil profile, indicate that the soil has been saturated  
 17 for an extended period. Group D consists of landscape, vegetation, and soil features that indicate  
 18 contemporary rather than historical wet conditions.

19 The State of Maryland mandates a minimum 25-foot buffer around all wetlands, with expansion up  
 20 to 100 feet where adjacent areas contain steep slopes or highly erodible soils, or for wetlands of  
 21 special state concern.



## 1 Results

### 2 **Wetlands**

3 A total of 2 wetlands (Wetland 2 and Wetland 4) were delineated within the study area. Two  
4 additional wetlands (Wetland 1 and Wetland 3) were delineated, but were later determined to be  
5 outside the study area. The locations of the delineated wetlands are shown on the Wetland  
6 Delineation Maps located in **Attachment 1**. Wetland delineation data sheets appropriate for use  
7 with the Atlantic and Gulf Coastal Plain Regional Supplement were completed for each wetland  
8 identified during the field investigation and are provided in **Attachment 2**. Photographs for each  
9 resource are provided in **Attachment 3**. The wetlands were classified according to the Cowardin  
10 System, as described in *Classification of Wetlands and Deepwater Habitats of the United States*  
11 (Cowardin et al., 1979). This hierarchical system aids resource managers and others by providing  
12 uniformity of concepts and terms used to define waters and wetlands according to hydrologic,  
13 geomorphologic, chemical, and biological factors. The wetland indicator status of the observed  
14 vegetation was identified using the National Wetland Plant List (Lichvar et. al, 2016) and soil map  
15 units were determined using the Natural Resources Conservation Service's Web Soil Survey (NRCS,  
16 2017). The following provides descriptions of the wetlands delineated in the field.

#### 17 *Wetland 2 (WET2)*

18 WET2 is a palustrine emergent (PEM) wetland located along Waters of the US 4 (WUS4),  
19 approximately 430 feet northwest of the intersection of Blandy Road and Dahlgren Road. Wetland  
20 conditions have formed within and surrounding the channel of WUS4 for approximately 200 feet,  
21 possibly due to sediment accumulation along the stream reach. The channel reforms downstream of  
22 WET2. The wetland is bound by steep slopes to either side. Surface water (A1), high water table (A2),  
23 and saturation (A3), were observed during delineation of the wetland. Hydrology of the wetland is  
24 influenced by the perennial flow of WUS4, sheet flow from surrounding slopes, and ponding of the  
25 stream channel. The plant community within the wetland consisted entirely of facultative wetland  
26 (FACW), facultative (FAC), and obligate (OBL) herbaceous species and passed the dominance test for  
27 hydrophytic vegetation. Soils met the criteria of a depleted matrix (F3). WET2 as delineated is 1,894  
28 square feet in area.

#### 29 *Wetland 4 (WET4)*

30 WET4 is a PEM wetland located in the right floodplain of WUS12, approximately 330 feet south of  
31 the intersection of Blandy Road and Dahlgren Road. The wetland is bounded by WUS12 to the north  
32 and gently sloping forested uplands to the south. Hydrology of the wetland is provided by WUS12  
33 and sheet flow from surrounding slopes. Hydrology indicators included less than one inch of surface  
34 water (A1), water-stained leaves (B9), drainage patterns (B10), moss trim lines (B16) on trees along  
35 the edge of the wetland, and the geomorphic position (D2) of the wetland. Vegetation in the wetland  
36 was dominated by Japanese stiltgrass (*Microstegium vimineum*), and soils met the criteria of a  
37 depleted matrix (F3). WET4 as delineated is 1,002 square feet in area.

1 *Upland Plot 1 (UPL1)*

2 Wetland vegetation, including Japanese stiltgrass, Pennsylvania smartweed (*Persicaria*  
 3 *pennsylvanica*), and other FAC, FACW, and OBL species, was observed approximately 55 feet west of  
 4 WUS5, along a slope downhill from what appeared to be a stormwater facility. Upon further  
 5 evaluation, soils in the area did not meet any hydric soil criteria. Other than the geomorphic position  
 6 of the area, no other primary or secondary indicators of prolonged inundation were observed.  
 7 Therefore, Upland Plot 1 was not delineated as a wetland. The location of Upland Plot 1 is shown on  
 8 the Wetland Delineation Maps provided in **Attachment 1** and the wetland delineation data form  
 9 used to document the site conditions is provided in **Attachment 2**.

10 **Table 2** summarizes the wetland areas identified within the study area.

11 **Table 2: Summary of Wetlands in the Study Area**

Wetland ID	Classification	Area (flagged)
WET2	Palustrine Emergent (PEM)	1894 s.f.
WET4	Palustrine Emergent (PEM)	1002 s.f.

12 **Waters of the US**

13 A total of 8 waterways were delineated in the study area. The waterways were delineated because  
 14 they are either relatively permanent tributaries with direct surface connections to TNWs, or they are  
 15 streams that flow part of the year and appear to have a physical, chemical, or biological connection to  
 16 larger bodies of water downstream and could affect the integrity of those downstream waters. Five  
 17 additional waterways (Waters of the US 7 through 11) were delineated, but further analysis indicated  
 18 that Waters of the US 7 is outside the study area, and Waters of the US 8, 9, 10, and 11 are isolated  
 19 drainage channels that lack surface connections to regulated resources and therefore would not be  
 20 considered jurisdictional.

21 The locations of the delineated waterways are shown on the Wetland Delineation Maps located in  
 22 **Attachment 1**, and photographs are included in **Attachment 3**.

23 The following provides descriptions of the waterways identified in the field.

24 *Waters of the US 1 (WUS1)*

25 WUS1 is a perennial tributary to Paint Branch that originates outside the study area at a stormwater  
 26 pond outfall, approximately 330 feet west of the intersection of East Loop Road and Maury Road.  
 27 The stream flows northeast, enters the study area briefly, and eventually drains into Paint Branch  
 28 approximately 1,400 feet northeast of the study area. WUS1 as delineated is approximately 1,456 feet  
 29 long, approximately 206 feet of which is within the study area. The channel is between 5 to 20 feet  
 30 wide, with an average width of 12 feet. The height at the top of bank ranges from 1 to 5 feet  
 31 throughout the stream reach, with an average bank height of approximately 3 feet. Channel substrate  
 32 consists of mostly silt with areas of exposed bedrock. At the origin of the stream, riprap outfall

1 protection was observed for approximately 100 feet along the stream reach. Flow was observed at the  
2 time of the field investigation, at a depth of approximately 4 inches.

### 3 *Waters of the US 2 (WUS2)*

4 WUS2 is an intermittent tributary to WUS1 that receives drainage from a wetland and surrounding  
5 slopes located outside the study area. The channel originates at the southern end of the offsite  
6 wetland, approximately 360 feet south of Perimeter Road. WUS2 as delineated is approximately 40  
7 feet long. The width of WUS2 is approximately 2 feet, with an average bank height of 1 foot. The  
8 substrate in WUS2 consists primarily of cobble. No flow was observed during the field investigation.

### 9 *Waters of the US 3 (WUS3)*

10 WUS3 is an intermittent tributary to WUS1 that originates approximately 330 feet north of the  
11 intersection of East Loop Road and Edison Road, at the outfall of a stormwater management pond  
12 adjacent to the East Loop Road parking lot. WUS3 as delineated is approximately 130 feet long and 5  
13 feet wide, with an average bank height of 2 feet. The channel consists entirely of riprap with step  
14 pools from the outfall to the confluence with WUS1. Flow was observed in the channel at the time of  
15 the investigation, and the depth of water in the channel was observed to be approximately 2 inches.

### 16 *Waters of the US 4 (WUS4)*

17 WUS4 is a perennial tributary to WUS1. The channel originates at an outfall along East Loop Road  
18 approximately 540 feet west of the intersection of East Loop Road and Southwest Loop Road.  
19 Beginning 900 feet downstream of the outfall, the stream channel dissipates into wetland conditions  
20 with no defined bed and bank for approximately 200 feet, which was delineated as WET2. WUS4  
21 flows through a culvert for 140 feet under Blandy Road. The stream flows northeast out of the study  
22 area and eventually drains into WUS1. WUS4 is approximately 1,424 feet long as delineated,  
23 approximately 1,313 feet of which occurs within the study area, excluding the length of WET2. The  
24 channel width ranges from 6-11 feet, with an average width of 8 feet. The height at top of bank ranges  
25 from 1 to 6 feet, with an average bank height of approximately 2 feet. The substrate within WUS4  
26 consists mostly of silt, sand, and cobble, with some large boulders and exposed bedrock. Flow was  
27 observed at the time of the field investigation, at a depth of approximately 3 inches.

### 28 *Waters of the US 5 (WUS5)*

29 WUS5 is an ephemeral drainage feature that has developed between WUS4 and a stormwater  
30 management pond to the north. The channel originates at the toe of the stormwater pond  
31 embankment south of the East Loop Road parking lot. WUS5 appears to have been formed as a  
32 result of overland flow from the upslope stormwater pond that has carved a channel into the hillside.  
33 The channel is approximately 33 feet in length, 1 foot in width, and the average bank height is  
34 approximately 3 feet. The substrate within WUS5 consists of silt and cobble. No flow was observed at  
35 the time of the field investigation.

### 36 *Waters of the US 6 (WUS6)*

37 WUS6 is an intermittent tributary to Paint Branch that originates at a culvert outfall immediately  
38 south of the intersection of Michelson Road and Northwest Loop Road. The stream as delineated is  
39 approximately 1,078 feet long, approximately 308 feet of which occurs within the study area before

1 exiting to the west. The stream width ranges from 2-5 feet, with an average width of 3 feet. The  
2 height at top of bank is 1 to 2 feet. The substrate within WUS6 generally consists of silt and cobble,  
3 with some areas of riprap. The riparian area along the right bank is 50 to 300 feet wide and consists  
4 of open fields with scattered trees and shrubs. The riparian area along the left bank to the east is over  
5 500 feet wide in most areas, consisting of 120 feet of open fields with scattered trees and shrubs,  
6 followed by a forested area. Wetland vegetation was observed within and surrounding the upper 120  
7 feet of the stream channel; however, upon further investigation, the soils in this area did not meet  
8 any hydric soil criteria. Some areas of localized ponding were observed at the time of the field  
9 investigation, but no continuous flow was observed within the stream channel.

10 *Waters of the US 12 (WUS12)*

11 WUS12 is an intermittent tributary to Paint Branch. The stream originates at a culvert outfall  
12 immediately south of the parking area of Building 130 on Dahlgren Road. WUS12 as delineated is  
13 approximately 517 feet long. The stream flows within the study area for approximately 312 feet before  
14 exiting the study area to the east. No defined bed and bank was observed for the uppermost 115 feet  
15 of the channel; however, a steep head cut was observed 115 feet downstream of the culvert outfall,  
16 and from this point, a defined bed and bank is apparent. The channel width ranges from 1 foot  
17 upstream of the headcut to 4 to 8 feet downstream of the headcut, with an average width of 4 feet.  
18 Bank heights range from 0 to 8 feet, with an average bank height of 5 feet. The substrate within  
19 WUS12 consists of sand and cobble. Flow was observed within portions of the channel at a depth of  
20 less than 1 inch.

21 *Waters of the US 13 (WUS13)*

22 WUS 13 is an ephemeral drainage feature originating 30 feet northeast of WUS12 at an eroded,  
23 collapsed portion of the parking lot of Building 130. The drainage channel appears to have formed  
24 due to erosion of the concrete and asphalt surface of the parking lot, and likely only conveys flow  
25 during and immediately after storm events. The feature flows east and southeast through a forested  
26 area for approximately 58 feet before reaching a confluence with WUS12. WUS13 is approximately 1  
27 foot wide. Leaf litter was displaced within the feature. Substrate within WUS13 consists of silt and  
28 exposed topsoil. No flow was observed at the time of the field inspection.

29 **Table 3** summarizes the delineated waterways within the study area.

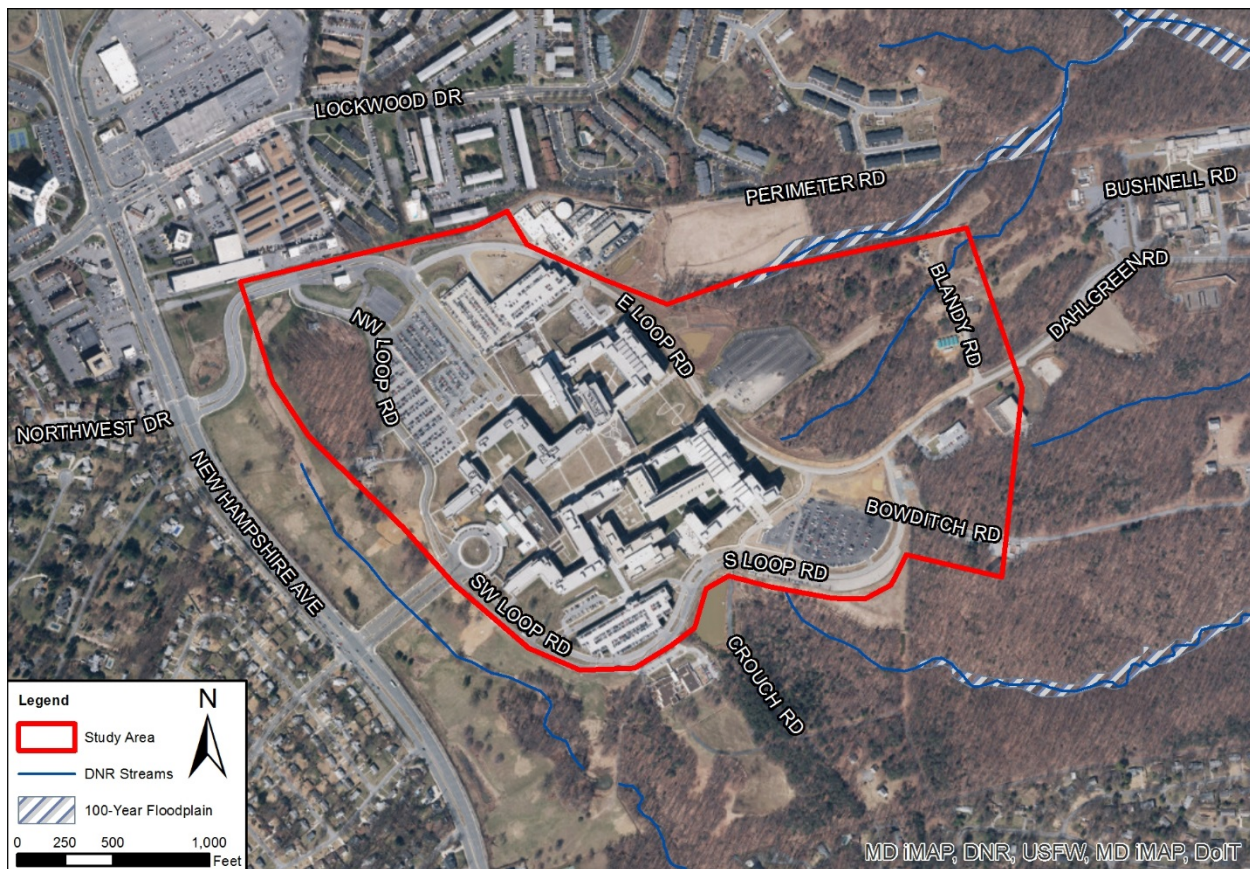
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**Table 3: Summary of Waters of the US in the Study Area**

Stream ID	Name	Classification	Length (flagged)	Area (flagged)
WUS1	Unnamed tributary	Perennial	1456 l.f.	16106 s.f.
WUS2	Unnamed tributary	Intermittent	40 l.f.	73 s.f.
WUS3	Unnamed tributary	Intermittent	130 l.f.	464 s.f.
WUS4	Unnamed tributary	Perennial	1424 l.f.	10102 s.f.
WUS5	Unnamed tributary	Ephemeral	33 l.f.	26 s.f.
WUS6	Unnamed tributary	Intermittent	1078 l.f.	3124 s.f.
WUS12	Unnamed tributary	Intermittent	517 l.f.	1737 s.f.
WUS13	Unnamed tributary	Ephemeral	58 l.f.	57 s.f.

2 **100-year Floodplain**

3 The 100-year floodplain is the area adjoining a river, stream, or other watercourse that becomes covered  
 4 with water in the event of a 100-year flood. Benefits provided by floodplains include vegetative  
 5 stabilization of river and stream banks, habitat for terrestrial and aquatic wildlife, erosion and  
 6 sedimentation control, and improved water quality by filtering pollutants. The 100-year floodplain is  
 7 mapped by the Federal Emergency Management Agency (FEMA) on Flood Insurance Rate Maps (FIRMs).  
 8 Based on FEMA Map Number 24031C0390D, effective September 29, 2006, a 100-year floodplain  
 9 associated with WUS1, an Unnamed Tributary to Paint Branch, is located within the study area (**Figure**  
 10 **2**).



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Figure 2. 100-Year Floodplain Map

## Conclusion

An investigation was conducted on July 17, August 1, and August 2, 2017, at the Federal Research Center (FRC) at White Oak, located in Silver Spring, Maryland to determine the presence, extent, location, and classification of any waters of the United States, including wetlands, or waters of the State within a study area provided by GSA (Figure 1). Two wetlands and 8 waters of the United States were identified during the investigation. Based on our assessment, these resources are likely to be subject to jurisdiction under Section 404 of the Clean Water Act and/or regulated under Maryland's wetland and waterways regulations.

This wetland investigation was conducted following the procedures outlined in the 1987 *Corps of Engineers Wetlands Delineation Manual*, the *Regional Supplement to the Corps of Engineers Wetlands Delineation Manual: Atlantic and Gulf Coastal Plain Region Version 2.0*, and all subsequent guidance and clarifications. As part of the permitting process, the results of the wetland delineation should be field verified by the Maryland Department of the Environment, Wetlands and Waterways Division and/or the U.S. Army Corps of Engineers. Activities which may affect waters of the US, wetlands, wetland buffers, the 100-year floodplain, or other regulated resources should not be initiated until the resources have been verified, and the regulatory agencies have issued the appropriate authorizations.

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## **ATTACHMENT 1**

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## **WETLAND DELINEATION MAPS**

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## **ATTACHMENT 2**

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## **WETLAND DELINEATION DATA SHEETS**

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**ATTACHMENT 3**  
**SITE PHOTOGRAPHS**

# US Food and Drug Administration (FDA) Headquarters Consolidation at White Oak

## FOREST STAND DELINEATION REPORT



Prepared for:

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September 2017

# APPENDIX C – Forest Stand Delineation Report

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Appendix B – Specimen Tree Table

Appendix C – Field Datasheets

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## Introduction

Stantec Consulting Services Inc. (Stantec) is currently working with General Services Administration (GSA) and the Food and Drug Administration (FDA) on a new Master Plan and Supplemental Environmental Impact Statement (EIS). The 2018 Supplemental EIS will assess proposed plans to accommodate an increase in FDA employees up to approximately 15,500. The updated FDA Headquarters Master Plan will provide guidance for FDA to effectively house the employees currently located at the FDA campus in White Oak, Maryland, staff located in a variety of leased locations, and projected personnel growth.

In support of master plan development, Stantec was contracted by GSA to perform a forest stand delineation (FSD) for the FDA campus in White Oak. Field data was collected and analyzed based on methodology described in the Maryland *State Forest Conservation Manual* (MDNR 1997). The results of the FSD determine the need for subsequent steps in the project review process, such as a Forest Management Plan which identifies protections needed before and after construction and potential mitigation areas. Fieldwork for the FSD was conducted during August of 2017.

## Site Description

The FDA Federal Research Center campus is located to the north of the Washington beltway (I-495) in White Oak, Maryland. Forest data collection was performed within a 148-acre study area in consideration of the proposed Master Plan for the campus. The interior of the campus consists of laboratories, offices, and support buildings. The facilities are surrounded by several large parking lots and a loop road that provides access to points east and west. Outside of the loop road, the campus includes open space, stormwater management ponds, and mature forests.

Forests to the east of the study area connect with extensive tracts of undeveloped, forested land. Because White Oak is a heavily populated urban landscape, the large tracts of forest constitute an important greenway. Small tributaries course through the forests towards the east. Eventually, the tributaries converge with Paint Branch, a tributary of the Anacostia River. The Paint Branch stream corridor lies approximately a quarter-mile to the east of the study area.

## Methodology

Forest stands in the study area were evaluated using field survey methods described in the Maryland *State Forest Conservation Manual*. Sampling points were located randomly throughout the site. A total of 14 sample plots were chosen in adherence to the requirement of one plot per 4 acres of forest and 2 plots minimum per stand. The random plot locations were based on preliminary stand boundaries identified during initial field reconnaissance. The stand boundaries were adjusted based on the resulting field work and plot data.

Field personnel assessed the vegetation in 1/10<sup>th</sup> acre sample plots (circular plot radius of 37.3 feet). Flagging was placed at the center of each plot location and at north, south, east, and west extents. Within each plot, all trees greater than 2 inches in diameter at breast height (dbh) were identified, measured, and recorded on FSD datasheets (Appendix C). Common understory species (less than 30

feet tall, but greater than 3 feet tall) and herbaceous species in the sample plots were noted. A 10-factor wedge prism was used to estimate the basal area of the stand at each plot location.

Throughout the study area, a survey for specimen trees was conducted. Specimen trees consisted of all trees equal to or greater than 30 inches in dbh. All specimen trees were identified, measured, and mapped using a GPS for inclusion in the FSD map.

### Soils

Based on soil mapping by the United States Department of Agriculture Natural Resources Conservation Service (USDA-NRCS), forest stands are situated upon 6 soil map units within the study area. Table 1 provides study area soils and associated characteristics. K Factor is included in the table to indicate soil erodibility. Values range from 0.02 to 0.69. The higher the K factor, the more susceptible the soil is to sheet and rill erosion by water.

**Table 1: Study Area Soils**

Map Symbol	Map Unit Name	K Factor (whole soil)	Hydric Rating	Drainage Class
116E	Blocktown channery silt loam, 25-45% slopes, very rocky	.28	partially hydric	well drained
61B	Croom gravelly loam, 3-8 % slopes	.20	not hydric	well drained
61C	Croom gravelly loam, 8-15 % slopes	.20	not hydric	well drained
61D	Croom gravelly loam, 15-25 % slopes	.20	not hydric	well drained
2C	Glenelg silt loam, 8-15% slopes	.37	partially hydric	well drained
58C	Sassafras loam, 8-15% slopes	.49	not hydric	well drained

Source: USDA-NRCS Web Soil Survey

### Rare, Threatened, and Endangered Species

The study area was reviewed for the presence of rare, threatened and endangered species. A preliminary response from the U.S. Fish and Wildlife Service showed no listed species or critical habitats.

### Results

Based on the methodology described in Section 3.0, forest stands within the study area were identified. A total of seven (7) forest stands were identified during field investigations in August 2017. The total acreage of the forest stands within the study area was 26.8 acres. Forest Stand Delineation mapping is included in Appendix A. A list of specimen trees is attached in Appendix B. The field datasheets and forest stand summary sheets are included in Appendix C and D.

Historical and cultural sites were considered to document the presence of trees that are part of a historic site or associated with a historical structure. A review of historic resources listed in the National Register and the Maryland Inventory of Historic Properties was performed. No historic sites or structures were listed in the National Register. Under the Maryland Inventory of Historic Properties, the FDA campus and surrounding land is recognized as part of the Naval Ordnance Laboratory Survey District. In addition, a number of building sites within the campus are recognized as historic properties.

A total of 74 specimen trees, measuring 30" dbh or greater, were identified in the study area. Specimen trees were generally in good condition. Only a few specimen trees appeared to be less healthy due to symptoms such as crown dieback and cavities. No champion trees were identified in the study area.

### **Forest Stand 1**

Forest Stand 1 is in the northwestern portion of the study area and is adjacent to the Loop Road surrounding the FDA campus. The total area of the stand is 5.7 acres. The stand is in a mid-successional stage of development and is characterized by medium to large-sized hardwood trees. Canopy cover throughout the stand is variable, ranging from 25% to 100% cover at sample plot points. In part due to leafy canopy coverage and maturity of the forest, herbaceous plants are absent. The ground is covered in leaf litter and woody debris; only a few greenbrier stems (*Smilax rotundifolia*) are noticeable. No invasive species were observed in the stand during field data collection. Wildlife habitat is limited because urban development surrounds the stand.

Sample plot data provided that dominant trees of Forest Stand 1 are white oaks (*Quercus alba*) in the 20-29.9' dbh size class. Black gum (*Nyssa sylvatica*) and red maple (*Acer rubrum*) were commonly identified as co-dominant and understory trees. Trees are healthy and well established. A total of 12 specimen trees were recorded in the stand. The average basal area for Forest Stand 1 is 55 square feet per acre, and the stand supports approximately 260 trees per acre.

Land slopes gently to the south at Forest Stand 1. Soil map units include Sassafras loam (8-15% slopes) and Croom gravelly loam (3-8% slopes). According to the USDA-NRCS, both soils are well-drained and neither of the soils are hydric.





**Photo 1: View of Forest Stand 1 looking south (sample plot 1-1)**

### **Forest Stand 2**

Forest Stand 2 is situated along steep slopes to the right of a perennial stream channel. The stand extends beyond the limits of the study area; within the study area the stand totals 2.8 acres. The stand is in a mid-successional stage of growth. Riparian cover provided by the forest protects stream water quality and provides slope stabilization. Sample plot data indicates that canopy cover provided by the stand is highest among all stands (80%). Based on the adjacency of the stream channel and the health of the stand, Forest Stand 2 has a high capacity to support wildlife.

The dominant tree species identified in the stand were tulip poplar (*Liriodendron tulipifera*) and northern red oak (*Quercus rubra*). Co-dominant species include red maple and Virginia pine (*Pinus virginiana*). Ten (10) specimen trees were recorded in the stand area. Sample plots indicate that the average basal area for the stand is 100 square feet per acre, and the stand supports 180 trees per acre. Herbaceous and shrub layers in the stand are generally comprised of invasive species. Invasive plants included Japanese barberry (*Berberis thunbergii*) and Japanese stiltgrass (*Microstegium vimineum*).

Large portions of Forest Stand 2 are situated on steep slopes and the stand area includes highly erodible soils. Soil map units include Glenelg silt loam (8-15% slopes), Blocktown channery silt loam (25-45% slopes), and Croom gravelly loam (3-8% slopes). Glenelg silt loam and Blocktown channery silt loam are considered partially hydric by the USDA-NRCS, due to 5% inclusions of Baile soils. Also, Blocktown channery silt loam is classified as having a severe hazard of erosion. Careful management of the soil during construction is recommended.



**Photo 2: View of Forest Stand 2 looking east (sample plot 2-2)**

### **Forest Stand 3**

Forest Stand 3 (3.7 acres) is a mid-successional stand located in the northeastern portion of the study area. The stand is separated from Forest Stand 2 by an abandoned right of way that is approximately 40 feet wide. In general, the right-of-way is enveloped by Japanese stiltgrass. Trees in Forest Stand 3 are less vigorous than other trees observed across the site. A considerable amount of fallen trees were observed, and large openings in canopy cover were noticeable. It appeared that trees are susceptible to wind and storm damage due to large parking lot construction to the southwest of the stand. In addition, there are large concrete stormwater pipes and junction boxes abandoned in the eastern portion of the stand.

Dominant trees in Forest Stand 3 are comprised of Virginia pine and tulip poplar in size classes up to 30" dbh or greater. Red maple was noted as a co-dominant species, and understory trees include black gum and black cherry (*Prunus serotina*). Five (5) specimen trees were recorded in the stand. The average basal area for the stand is 70 square feet per acre, and sample plots indicate the stand supports 170 trees per acre. Herbaceous and shrub cover is highest among all forest stands, but plants are largely comprised of invasive species. Japanese stiltgrass, Japanese barberry, and Japanese honeysuckle (*Lonicera japonica*) were commonly observed.

Small portions of the stand are situated on steep slopes and contain highly erodible soils. Soil map units within Forest Stand 3 include Blocktown channery silt loam (25-45% slopes) and Croom gravelly loam (3-8% slopes). Blocktown channery silt loam is considered partially hydric by the USDA-NRCS, due to 5% inclusions of Baile soils. Also, Blocktown channery silt loam is classified as having a severe hazard of erosion by the USDA-NRCS. Careful management of the soil during construction is recommended.