







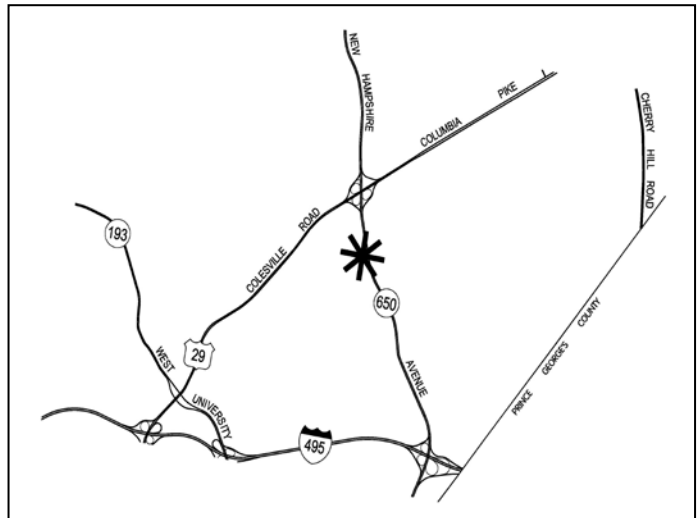
### FDA Campus Mandatory Referral (MR2018023)

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

### Description

Staff Report Completed: 4/26/18

The U.S. General Services Administration (GSA), in cooperation with the Food and Drug Administration (FDA), filed a Mandatory Referral on March 14, 2018 for the *2018 FDA Federal Research Center Master Plan* and the *2018 Federal Research Center Master Plan, Draft Environmental Impact Statement*. FDA plans to expand their campus in White Oak and increase the total number of employees to 18,000, from 2025 to 2035. The 130-acre FDA campus is located within the 662-acre Federal Research Center, of which 622 acres are in Montgomery County and 40 acres are in Prince George's County. This staff report provides comments regarding potential mitigation for the impacts resulting from the addition of 9,000 employees to the facility. The project is within the 2014 *White Oak Science Gateway Master Plan*.



### Summary

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

## SECTION 1: SITE DESCRIPTION AND BACKGROUND

### Site Description

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

### Background

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

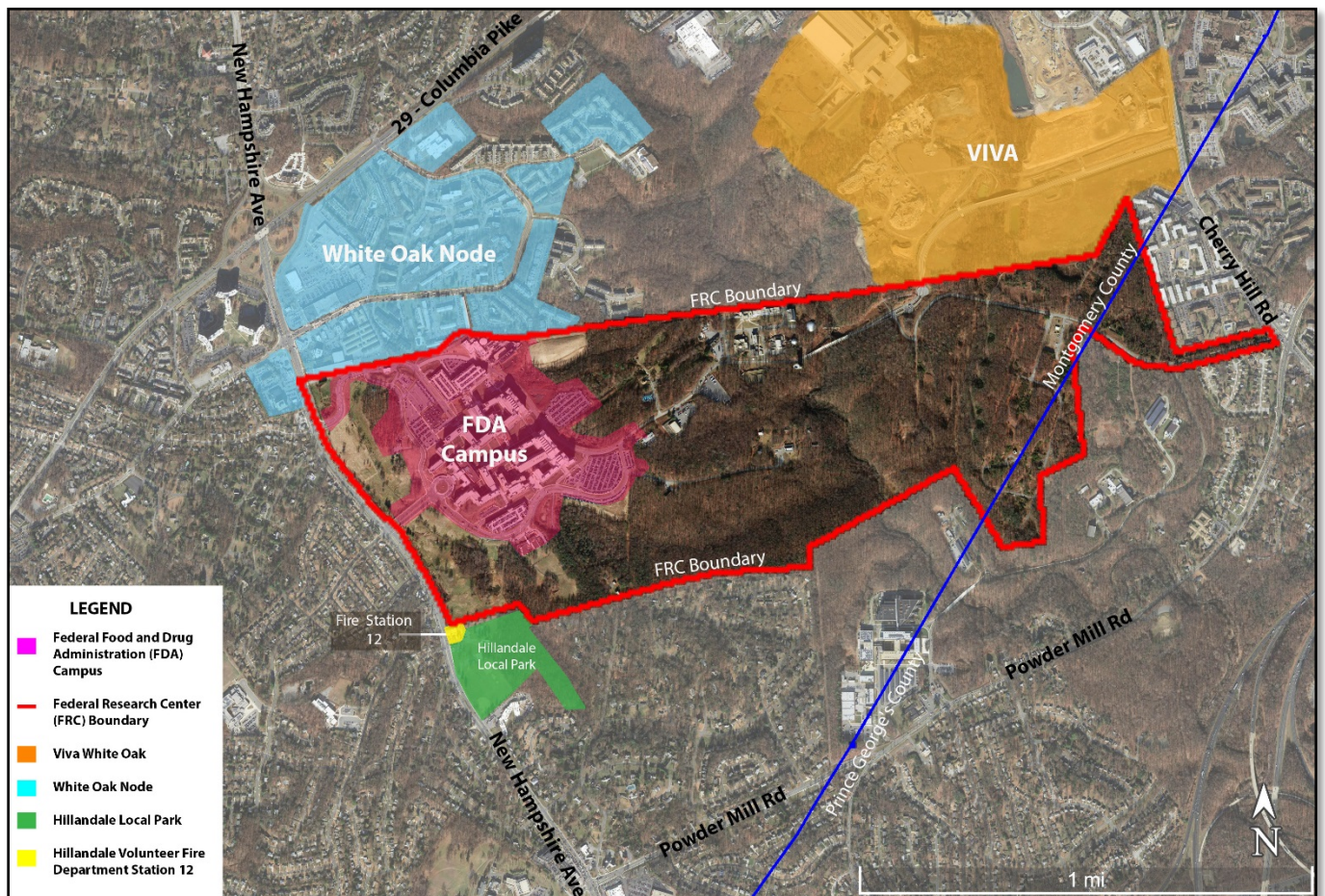


Figure 1- FDA campus on the FRC

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

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

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

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

## SECTION 2: PROPOSED PROJECT

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

**Alternative A: Mid-Rise Buildings:** Under this alternative, proposed building heights are comparable to existing building heights. New buildings would be placed at the eastern end of the commons and the plaza would be extended to facilitate a walkable campus. There would be five new office buildings, four new parking garages, a Communications Center, and a Conference Center.



*Figure 2- Alternative A*

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



*Figure 3- Alternative B*

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



Figure 4- Alternative C

### SECTION 3: RECOMMENDATIONS

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

#### **Environment**

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

#### *Sewer Capacity*

WSSC has determined through its sewer modeling that 17,000 feet of sewer in the Paint Branch basin within Montgomery County, and running adjacent to the FRC, will have capacity constraints under projected future wet weather flow conditions. The additional development associated with the planned expansion of the FDA campus has the potential to create sewer overflows. Mitigation has been suggested in the draft EIS, however, GSA should coordinate with developers of neighboring properties and the County to be a part of any solution for the sewer expansion necessary for development so that no overflows occur.

### *Stormwater Management*

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

### *Forest Loss*

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

### *Mitigation*

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

### **Transportation**

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

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

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

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

### *Planned Connection between FDA and the White Oak Center*

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

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

### *Bicycle and Pedestrian Connections*

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

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

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

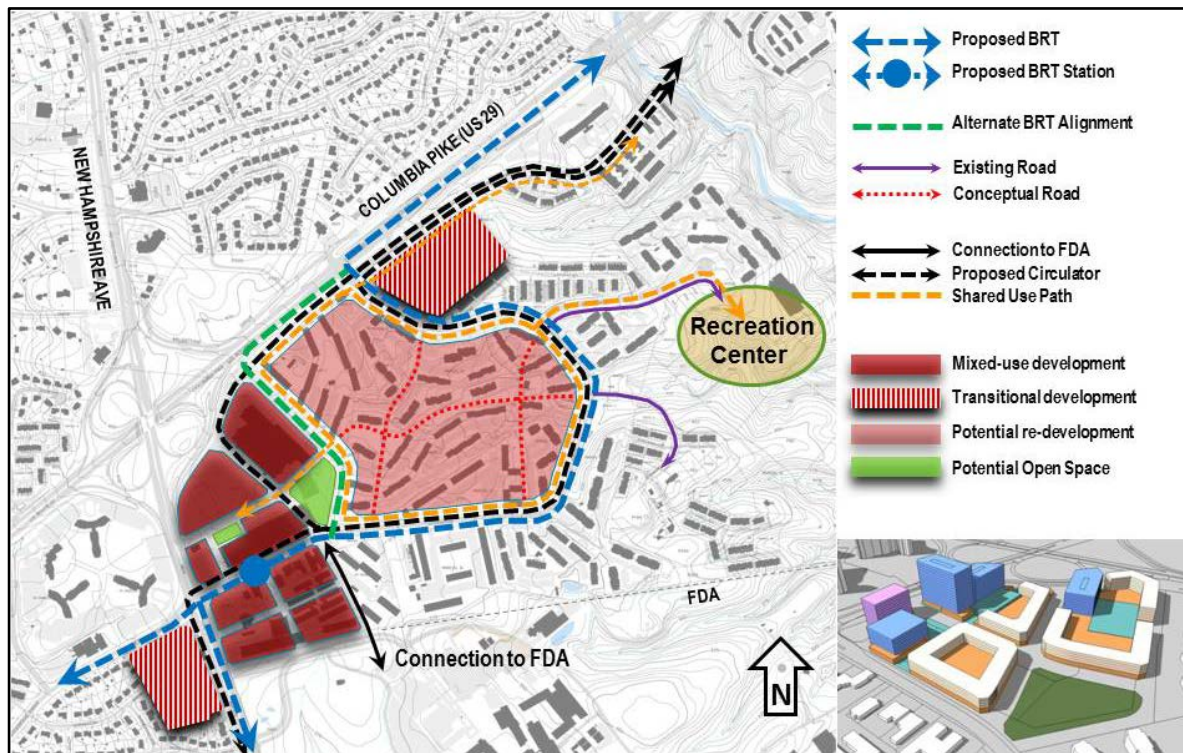


Figure 5- Connection to FDA

### Parking

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

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

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

### Historic Preservation and Urban Design

FDA is located within the Federal Research Center, which was formerly the Naval Ordnance Laboratory (NOL) campus. In 1979, the County Council adopted the *Master Plan for Historic Preservation* and the Historic Preservation Ordinance (Chapter 24A). The Master Plan includes the list of all officially-designated historic sites and districts. Sites and districts that have been added to the Master Plan have



been found to be of special historic or architectural significance and merit protection under the Historic Preservation Ordinance. A 10.5-acre environmental setting was designated on the County's *Master Plan for Historic Preservation* for the NOL site. In 2002, a Memorandum of Agreement (MOA) between FDA, GSA, the Advisory Council for Historic Preservation, and the Maryland Historical Trust was created for the historic NOL site. As part of the final EIS, a revised MOA should be created to address contributing resources to the NOL site, the view shed from New Hampshire Avenue, and the amenity space within the historic golf course green buffer.

#### *View shed from New Hampshire Avenue*

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

#### *Historic Golf Course Buffer*

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

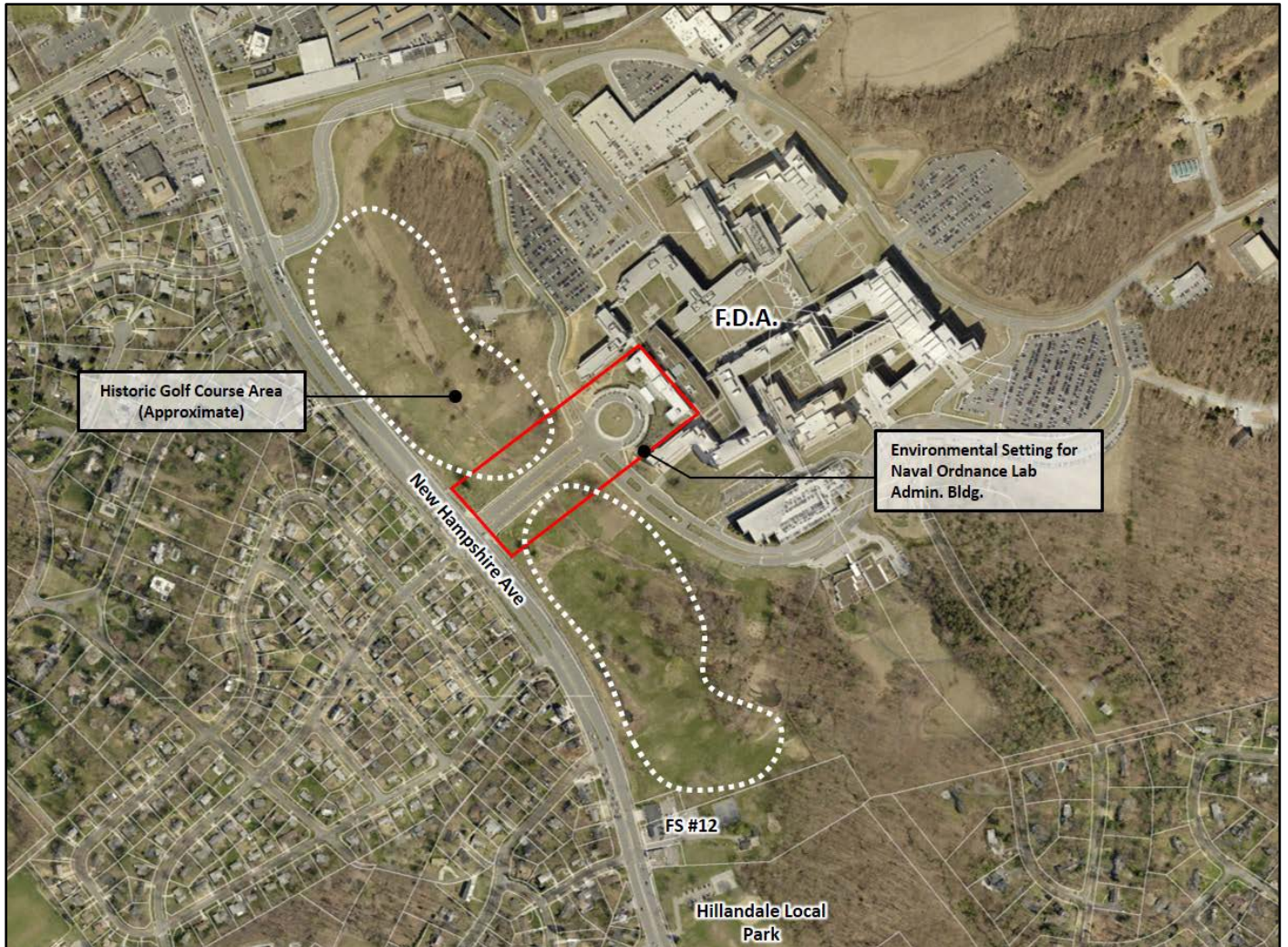


Figure 6- Historic view shed from New Hampshire Avenue and golf course green buffer

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

**Parks and Open Space**

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

*Environmental Restoration*

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

Environment (MDE) prior to construction, and forest management/tree conservation management plans.

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

#### *Open Space/Amenities*

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

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

#### **Memorandum of Understanding**

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

## **SECTION 4: COMMUNITY CORRESPONDENCE**

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

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

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

## **SECTION 5: CONCLUSION**

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

### **ATTACHMENTS**

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

## Attachment 1



14741 Governor Oden Bowie Drive  
Upper Marlboro, Maryland 20772  
[www.mncppc.org/pgco](http://www.mncppc.org/pgco)  
301-952-3595

April 4, 2018

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

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

Dear Mr. Leftwich:

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

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

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

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

## Attachment 1

Mr. Troy Leftwich  
Page 2  
April 4, 2018

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

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

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

- **Historic Preservation Conclusions** - If new construction is proposed in the eastern portion of the FDA Campus, PG:61-045, Aurora Pulsed Radiation Simulator and M:33-025, Naval Ordnance Laboratory Survey District could be impacted. Any new construction should consider visual impacts on the Naval Ordnance Laboratory Survey District (M:33-025).
- **Archeology Findings** - The property is located within the Atlantic Coastal Plain, a relatively flat topographical region. The Paint Branch and West Branch stream valleys are in the eastern part of the property. The FDA campus has been surveyed for archeological resources.

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

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

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

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

## Attachment 1

Mr. Troy Leftwich  
Page 3  
April 4, 2018

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

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

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

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

Sincerely,

  
Andree Green Checkley  
Planning Director

### Enclosures

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

# Attachment 1



## THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION


Prince George's County Planning Department  
Countywide Planning Division, Transportation Planning Section

(301) 952-3680  
www.mncppc.org

March 30, 2018

### MEMORANDUM

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

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

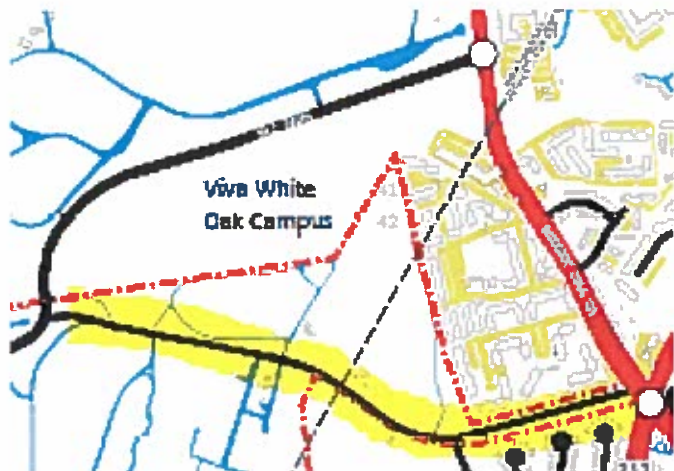
SUBJECT: 2018 FDA Federal Research Center Master Plan and Draft Environmental Impact Statement

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

#### *Review Comments*

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

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



master plan, and with Coffman Road highlighted. It is requested that Figures 1-17 and 1-19 in the master plan be revised to show Coffman Road within Prince George's County as a dashed line or some similar convention to convey the restricted use nature of the roadway.



## **Attachment 1**

Page 2 of 2

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

# Attachment 1



## THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

Prince George's County Planning Department  
Historic Preservation Section

(301) 952-3680  
www.mncppc.org

April 2, 2018

### MEMORANDUM

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

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

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

### Background

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

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

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

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

### Findings

#### Historic Preservation

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

## **Attachment 1**

FDA Federal Research Center Master Plan  
April 2, 2018  
Page 2 of 2

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

### **Archeology**

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

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

### **Conclusions**

#### **Historic Preservation**

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

#### **Archeology**

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

## Attachment 1



# THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

14741 Governor Oden Bowie Drive  
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[www.mncppc.org/pgco](http://www.mncppc.org/pgco)

April 2, 2018

### MEMORANDUM

**TO:** Maria Martin, Supervisor, Special Project Section

**VIA:** Susan Lareuse, Master Planner, Urban Design Section *SL*

**FROM:** *HZ* Henry Zhang, Master Planner, Urban Design Section

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

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

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

## Attachment 1

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

- **Buildings and spatial pattern-** The existing FDA campus has been developed under four different master plans and established a unique site layout that features a central green open space surrounded by a series of human-scaled open courtyard spaces enclosed by midrise buildings. The open courtyards further complement the central green. Various buildings of different building techniques and finish materials from different time periods provide visual interest surrounding the open courtyards. This unique open space/courtyard pattern should be preserved in the new master plan for future expansion to maintain the integrity, continuity and strong spatial eligibility of the FDA campus
- **Viewshed-** The existing FDA campus is part of the historic resources of the White Oak Naval Ordnance Laboratory Historic District. The prominent features of the primary viewshed from New Hampshire Avenue to the campus are the existing Main Administration Building and the flagpole. The development alternative that continues the building massing and clustering of the existing campus will not only preserve the organic pattern of the FDA campus, but also preserve this historic vista from New Hampshire Avenue.
- **On-site circulation-** Pedestrian circulation needs to be strengthened within the proposed master plan by eliminating gaps in the existing network and by providing wider sidewalks that can accommodate bicycling. The master plan proposes 10-foot wide sidewalks only for the new loop streets. Ten-foot-wide sidewalks should be implemented in phases throughout the entire campus. Vehicular circulation is building on the existing roadways and oriented toward New Hampshire Avenue. An additional access road- FDA Boulevard off Cherry Hill Road is a good addition to improve the accessibility of the FRC campus. The master plan also includes construction of a new distribution center and truck screening facility and shows two possible locations-one is located along New Hampshire Avenue and the other is located in the northeast section of the site off FDA Boulevard. The Urban Design Section supports the location off FDA Boulevard because this location will separate truck traffic from the employee traffic and help evenly distribute trips to the larger campus. In addition, this location is very close to the Interstate Highway System, where the intersection of I-95 and Beltway I-495 is located.
- **Native Species-**The Federal Government is the leader of the sustainable development. The additional buildings on the campus will achieve LEED Gold certification. The master plan also provides some general design guidelines for future landscaping on the campus. The Urban Design Section suggests that in addition to the proposed landscaping design guidelines, all landscaping materials should be native species and all herbaceous planting materials should be pollinator friendly species.



## Attachment 1

Countywide Planning Division  
Environmental Planning Section

14741 Governor Oden Bowie Drive  
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[www.mncppc.org/pgco](http://www.mncppc.org/pgco)

April 2, 2018

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

FROM: Thomas Burke, Senior Planner, Environmental Planning Section

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

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

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

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

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

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

# Attachment 1



## DEPARTMENT OF TRANSPORTATION

Isiah Leggett  
County Executive

Al R. Roshdiah  
Director

### MEMORANDUM

April 16, 2018

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

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

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

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

1) **Funding & Implementation**

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

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

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

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#### Office of the Director

101 Monroe St., 10th Floor • Rockville, Maryland 20850 • 240-777-7170 • 240-777-7178 FAX  
[www.montgomerycountymd.gov/dot](http://www.montgomerycountymd.gov/dot)

## Attachment 1

### 2) Major Capital Projects

It is not immediately clear whether the proposed roadway infrastructure – particularly at the identified intersections – fully mitigates FDA traffic, or how FDA traffic would be able to effectively access the site via the 11 intersections where conditions are still found to be failing even after mitigation is implemented.

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

### 3) Parking Ratio

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

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

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

### 4) Survey Data

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



## Attachment 1

### 5) Telework

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

### 6) Trip Distribution

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

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

### 7) Publicly Accessible Streets

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

### 8) Non-Auto Analysis

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

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

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

## Attachment 1

### 9) Transit Center

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

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

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

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

### 10) Bikeshare

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

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

## Attachment 1

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

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

### 11) TMP

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

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

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

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

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

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

## Attachment 1

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

CC:AB

Attachments: Detailed technical comments  
2017 Commuter Services Survey

cc: Al Roshdieh, MCDOT  
Gary Erenrich, MCDOT  
Andrew Bossi, MCDOT  
Peter Fosselman, MCEO  
Jewru Bandeh, ECRSC  
Amy Donin, MCDGS  
Nancy Sturgeon, MNCPPC  
Troy Leftwich, MNCPPC  
Ed Axler, MNCPPC  
Matt Baker, SHA

April 16, 2018

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

Dear Mr. Gyamfi:

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

*General Comments*

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

## Attachment 1

Mr. Paul Gyamfi  
Page Two

- This DEIS does not appear to note MDOT SHA's in-planning I-495 and I-270 Public-Private Partnership (P3) Project announced by Governor Larry Hogan in September 2017. This \$7.6 billion investment will implement express toll lanes on I-270 and I-495 in Maryland. Planning funding for these improvements is included in MDOT's FY 2018-2023 Consolidated Transportation Program (CTP). These improvements are included in the National Capital Region Transportation Planning Board's (TPB) in-draft long-range transportation plan (LRTP), *Visualize 2045*, and accompanying regional transportation modeling efforts. As this DEIS analyzes a 2040 scenario, these improvements should be assumed in any modelling that informs this DEIS. The MDOT SHA anticipates completing planning and selecting a concessionaire in 2020. The MDOT SHA requests that this DEIS consider including mention of this project as well as the transportation benefits that will result from implementation of this project.
- In general, intersection design is beyond the scope of a master plan. Nonetheless, future modifications to intersections should not result in failing levels of service on MDOT SHA roadways and will need to be supported by appropriate traffic operations studies at the time improvements are proposed to advance.
- In the development of this DEIS (and the accompanying master plan), did GSA consider implementing campus build-out thresholds whereby specific campus employment populations are accommodated only after previous thresholds' commute/parking needs are accommodated. Such a consideration may prevent undue stress on the local roadway network and on-campus parking facilities should anticipated non-auto mode shares not be reached.
- The effectiveness of transportation demand management strategies and policy initiatives referenced in this DEIS and appendices should be evaluated comprehensively during the five-year planning phase.

### *2018 FRC Master Plan DEIS*

- p. 43 – Under “Traffic and Transportation,” it is reported that the No-Action Alternative would have negative impacts due to traffic from current development. As the current development is there already, MDOT SHA is not sure why there would be a further negative impact from the site.
- p. 48 – The proposed transportation mitigation measures mention US 29 ITS improvements. It should be noted in this text that such measures will need to be coordinated with MDOT SHA and the Montgomery County Department of Transportation (MCDOT) as is noted for other mitigation measures on the list.

## Attachment 1

Mr. Paul Gyamfi  
Page Three

- p. 65 – The report notes in subsection 3.1.7 that few home relocations are expected with the addition of almost 7,000 employees to the site. It is not noted where these people currently work to support this.
- p. 165 – In the first paragraph, it appears that the descriptions of the eastern and western study area limits are switched.
- p. 173 – The description of Michelson Road intersection mitigation describes Mahan Road left-turns.
- p. 174 – The description for US 29 mitigation at Industrial Parkway mentions changes to Old Columbia Pike in the fourth item instead of to Columbia Pike.

### *DEIS Appendix G – Transportation Technical Report – Project Summary*

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

## Attachment 1

Mr. Paul Gyamfi  
Page Four

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

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

- No comments.

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

- No comments.

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

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



## Attachment 1

Mr. Paul Gyamfi  
Page Five

- p. 51, New Hampshire Avenue (MD 650) and Powder Mill Road – Thought regarding significant modification requiring right-of-way may be needed for full mitigation, the improvement needed to meet the mitigation requirements should be discussed. Also, based on the results of the Synchro analysis in Exhibit 3, the proposed optimization of signal phase lengths does not appear significantly to improve operations.
- p. 53, New Hampshire Avenue (MD 650) and Northwest Drive/Michelson Road – The description of Michelson Road intersection mitigation describes Mahan Road left turns.
- p. 53, New Hampshire Avenue (MD 650) and Northwest Drive/Michelson Road – The MDOT SHA currently is reviewing local resident concerns regarding cut-through traffic from the FRC via Northwest Drive. Anticipated MD 650 traffic conditions may exacerbate future diversion to the local/residential network without proper mitigation, e.g., signage and restrictions.
- p. 53, New Hampshire Avenue (MD 650) and Lockwood Drive – The suggestion to restrict eastbound Lockwood Drive left-turn movements to northbound MD 650 seems to require difficult wayfinding for US 29 motorists.
- p. 59, Transit, Pedestrian, and Bicycle Facilities – See previous comment regarding bicycle and pedestrian infrastructure development, p. 4.
- p. 60, table 18 – The proposed mitigation is shown to keep US 29 intersection operations at Lockwood Drive at LOS F. Yet, in Exhibit 4, the evening peak-period LOS degrades from LOS E to LOS F with the addition of mitigation. Please check and revise mitigation if it will, in fact, make the intersection operate at a lesser LOS.
- General – It is unclear why these analyses did not include an analysis of the US 29 interchange at MD 650, especially the effect of increased traffic on merges and weaves.

### *DEIS Appendix G – Transportation Technical Report – Section 4 Conclusions*

- pp. 61-65, Additional Roadway Capacity - See previous comment regarding US 29 interchange project development status, pp. 2-3.
- p. 65 - Transit, Pedestrian, and Bicycle Facilities – See previous comment regarding bicycle and pedestrian infrastructure development, p. 4.

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### *DEIS Appendix G – Exhibits 1-2*

- It appears that northbound US 29 morning peak-period turning volumes at Tech Road were repeated from the interchange at Randolph Road and are lower than MDOT SHA's actual counts.
- Northbound US 29 through movements in the evening peak period appear to be much higher than MDOT SHA's actual counts between MD 650 and Musgrove Road.
- The MD 650 intersection at Powder Mill Road has a relatively significant U-turn movement volume that is not shown in these counts.

### *DEIS Appendix H – Draft Transportation Management Plan – Executive Summary*

- p. ii, Goals – The MDOT SHA supports goals and strategies that seek to lessen the single-occupant vehicles (SOV) on the roadway network and commends GSA for seeking to cut SOV mode share to 54 percent. Nonetheless, this plan does not appear to address what happens on an atypical day. Is a parking “cushion” included in this analysis for those days when the SOV target is not reached?
- p. iii, Strategies, Transit, and Shuttles – This plan, in this and other sections, speaks about increasing the use of commuter bus as a commute mode. While this plan notes that MDOT MTA Commuter Bus 204 currently stops at the FRC, the plan does not appear to note that MDTA MTA Commuter Bus routes 305 (Columbia-Washington via US 29), 315 (Columbia-Washington via US 29), and 325 (Columbia-Washington via US 29) all pass near to the FRC and that it may be a viable option to work with MDOT MTA to amend these routes also to stop at the FRC.
- p. iv, Strategies, Bike/Walk to Work – This plan should note (and does in other locations) that many roadways in the area are owned and maintained by MDOT SHA. Bicycle and pedestrian accommodations upgrades along such roads (I-95, I-495 (Capital Beltway), US 29 (Columbia Pike), and MD 650 (New Hampshire Avenue)) should be coordinated with both MDOT SHA and the applicable local jurisdiction.

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

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

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- US 29 interchanges at Stewart Lane, Tech Road/Industrial Parkway, Musgrove Road/Fairland Road, Greencastle Road, and Blackburn Road are included in this draft document. This new LRTP will replace the existing *Constrained Long-Range Plan* (adopted 2016). This DEIS should reflect TPB's regional transportation model.
- p. 5, section 1.1.3 Local – Currently, Montgomery County Planning Department staff is drafting a comprehensive update to the *Master Plan of Highways and Transitways*, the first comprehensive update to the plan since 1955. This plan is to be adopted in late 2018 or early 2019.

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

- p. 8, section 2.1 Local Roadway Network – This plan should note that I-95, I-495, US 29, and MD 650 are components of the NHS. In addition, this plan should note that these roadways are owned and maintained by MDOT SHA. Cherry Hill Road is owned and maintained by Montgomery and Prince George's counties in their respective jurisdictions.
- p. 8, section 2.1 Local Roadway Network – This plan states that the posted speed limit on I-95 is 55 mph. North of I-495, the posted speed limit is 65 mph.
- p. 11, section 2.3.2.1 Bus Rapid Transit (BRT) – The MDOT SHA recommends this plan clarify the extent of US 29 BRT improvements. The popular conception of BRT is a bus running in a fixed, dedicated lane or lanes. Montgomery County's planned US 29 BRT does not include all elements of full BRT.
- p. 18, section 2.5.1 White Oak Master Plan – This plan states that improvements identified in the White Oak Master Plan are assumed already to be constructed in the No Action condition. Is there any assurance that these will be completed prior to FRC build-out?

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

- No comments.

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

- p. 45, section 4.0 Traffic Impact Analysis – In paragraph one, clarify that the “FDA Master Plan Traffic Technical Report (TTR)” and Appendix G are one in the same, or that one is an update to the other.
- p. 45, section 4.0 Traffic Impact Analysis, Transportation Demand Management – See previous comment regarding park-and-ride network development, p. 3.

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

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

Sincerely,



Samantha Biddle  
Chief  
Regional and Intermodal Planning Division

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

## Attachment 1

*Hillandale*



## VOLUNTEER FIRE DEPARTMENT, INC.

10617 NEW HAMPSHIRE AVENUE, SILVER SPRING, MARYLAND 20903-1195

(301) 434-2400 • FAX (301) 434-7886

February 21, 2018

TO: S. Jones, GSA  
FROM: R. Hartung, HVFD  
RE: Hillandale Fire Station 12 Expansion

Hillandale Fire Station 12, located at 10617 New Hampshire Avenue, Silver Spring, MD 20903, is a 3-apparatus bay facility that also houses the Hillandale Volunteer Fire Department (HVFD) administrative offices, meeting room and vehicle maintenance shop.

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

In 1988 the Department of the Navy designated the HVFD as the primary fire, rescue and emergency medical services provider to Federal Government's White Oak campus, 10903 New Hampshire Avenue, Silver Spring, MD 20993.

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

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

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

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

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

Critical to any upgrade and expansion to Fire Station 12 would be the inclusion of 4 additional apparatus bays of sufficient size to house modern emergency services vehicle. Therefore, the HVFD would like to engage in discussion with the GSA towards the acquisition of a 10 acre parcel on the White Oak Campus adjacent to the existing Fire Station 12 property. The acquisition of a parcel of this size will allow the HVFD to construction the additional 4 apparatus bays, provide for sufficient fire department personnel


## Attachment 1

and public parking and meet any land development requirements (storm water management, building setbacks, etc.).

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

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

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

Russell Hartung, President   
Hillandale Volunteer Fire Department

# Attachment 1

NAVMATINST 11320.10A

## MUTUAL AID FIRE FIGHTING ASSISTANCE AGREEMENT

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

WITNESSETH:

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

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

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

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

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

THEREFORE BE IT AGREED THAT:

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

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

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

b. In accordance with the terms of this agreement, forthwith dispatch such apparatus and personnel, as in the judgment of the senior officer receiving the call should be sent, with instructions as to their mission.

**Attachment 1**

3. The rendering of assistance under the terms of this agreement shall not be mandatory, but the party receiving the request for assistance shall immediately inform the requesting service if assistance cannot be rendered.

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

5. All services performed under this agreement shall be rendered without reimbursement of either party or parties, except that the Hillandale VFD, Co's #12 & #24 shall be entitled to seek reimbursement pursuant to the section 11 of the Federal Fire Prevention and Control Act of 1974 (15 U.S.C. 2210) and Federal regulations issued thereunder (Title 45 of the Code of Federal Regulations 2010) for all or any part of direct expenses and losses (additional fire fighting cost over and above normal operating cost) incurred in fighting fires on property under the jurisdiction of the United States.

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

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

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

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

FOR THE HILLANDALE VOLUNTEER FIRE DEPARTMENT, CO.S #12 & #24

*Ralph A. Stitt* FIRE CHIEF, 9-12-88

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

*Ralph Lawrence* FIRE CHIEF 9-12-88  
*[Signature]* CAPT, USN COMMANDING OFFICER 9/12/88



## Attachment 2



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

April 13, 2018

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

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

Dear Mr. Gyamfi:

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

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

## **Background**

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

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

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

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

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

**Environment**

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

*Sewer Capacity*

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

*Stormwater Management*

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

*Forest Loss*

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

*Mitigation*

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

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

### **Historic Preservation and Urban Design**

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

#### *Contributing Resources*

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

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

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



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

### *Viewshed from New Hampshire Avenue*

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

### *Historic Golf Course Buffer*

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

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### Transportation

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

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

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

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

#### *Planned Connection between FDA and the White Oak Center*

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

## Attachment 2

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

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

### *Bicycle and Pedestrian Connections*

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

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

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

### *Parking*

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

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

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

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

### Memorandum of Understanding

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

### Conclusion

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

Sincerely,



Gwen Wright  
Director



## Attachment 3

**From:** Eileen Finnegan  
**To:** [Leftwich, Troy](#)  
**Subject:** Re: Comments on Draft 2018 FDA Federal Research Center Master Plan  
**Date:** Monday, April 16, 2018 8:59:52 PM  
**Attachments:** [connectiontoFDA.JPG](#)

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FYI

----- Forwarded Message -----

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

Hello Mr. Gyamfi,

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

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

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

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

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

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

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

### **Attachment 3**

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

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

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

## **Attachment 3**

### **Greater Colesville Citizens Association**

PO Box 4087  
Colesville, MD 20914  
March 22, 2018

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

Dear Mr. Gyamfi

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

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

### **EIS Alternative**

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

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

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

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

### **External Transportation**

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

#### Congestion Known

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

#### Draft EIS Overstates Congestion

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

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

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

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

## Attachment 3

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

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

### Montgomery County Processes to Avoid Congestion Getting Worse

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

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

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

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

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

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

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

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

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

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

### **External Integration with the FRC**

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

### **Attachment 3**

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

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

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

In summary:

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

Sincerely

Daniel L. Wilhelm, President GCCA

## Attachment 3

### Attachment 1.

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

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

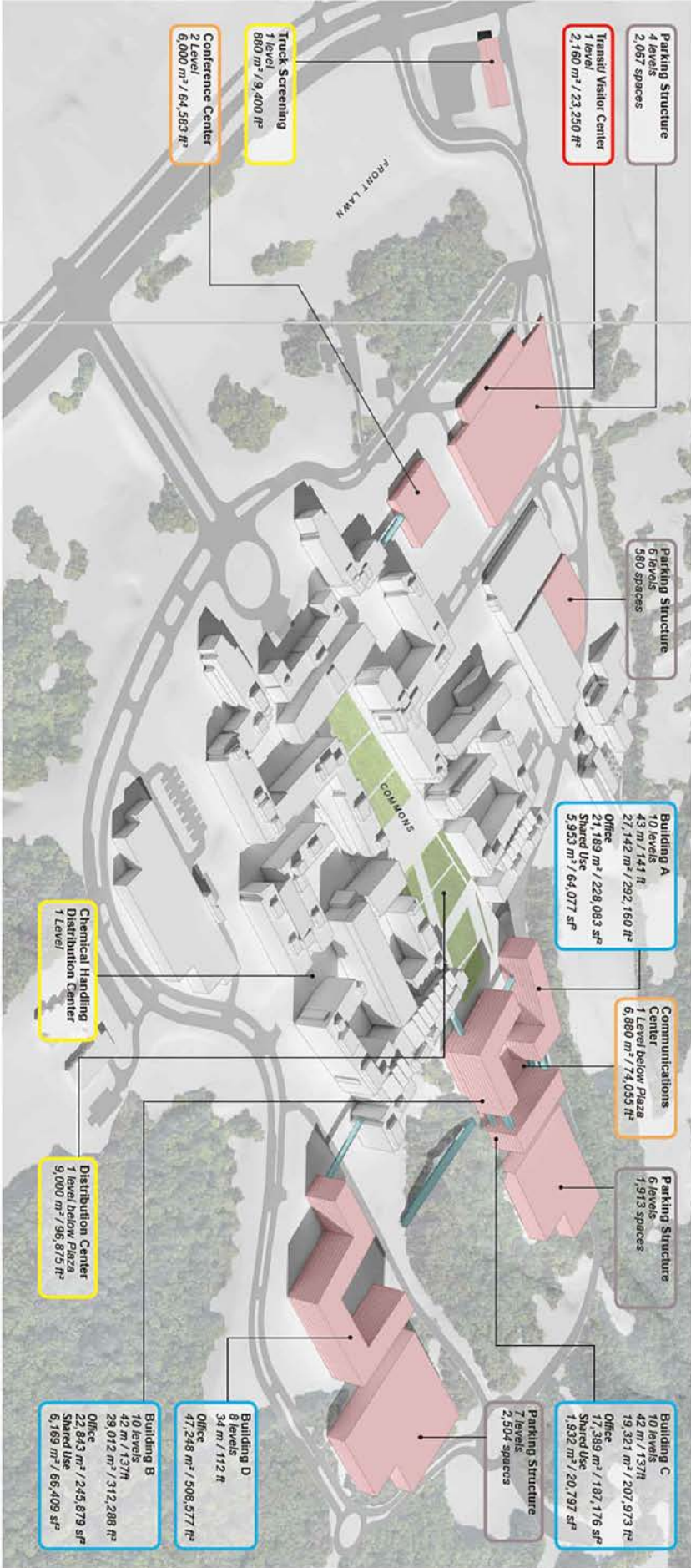
In addition some of the posted speed limits are higher than shown in Table 18. Since capacity is a function of speed, the result will be a higher capacity and thus less congestion.

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



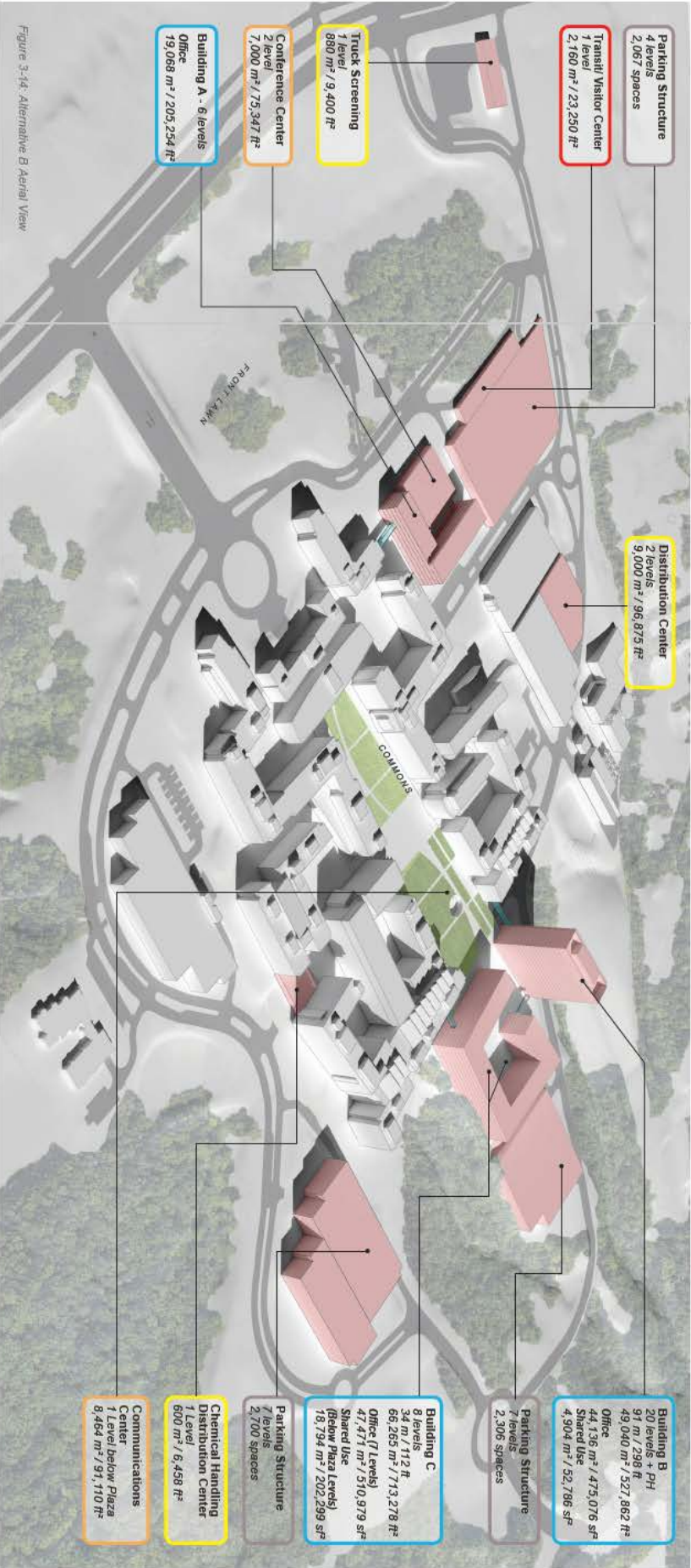
# Attachment 4

## Alternative A: Mid-Rise Buildings



# Attachment 4

## Alternative B: One High-Rise Office Building



# Attachment 4

## Alternative C: Two High-Rise Office Buildings

