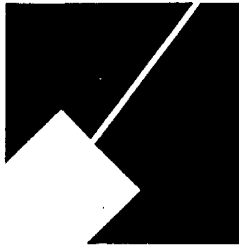


M-NCPPC



MONTGOMERY COUNTY DEPARTMENT OF PARK AND PLANNING

THE MARYLAND-NATIONAL CAPITAL
PARK AND PLANNING COMMISSION

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Silver Spring, Maryland 20910-3760
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December 22, 2004

Ms. Denise Decker
NEPA Team Leader
U.S. General Services Administration
National Capital Region
301 7th Street SW, Room 7600
Washington, DC 20407

SUBJECT: Draft Supplemental Environmental Impact Statement (SEIS) for the Development of the Food and Drug Administration (FDA) Consolidation at the Federal Research Center at White Oak

Dear Ms. Decker:

This letter provides requested comments from the Montgomery County Department of Park and Planning on the 2004 Draft SEIS. We thank you for the opportunity to comment on the document.

The Draft SEIS is generally consistent with previous recommendations and comments made by the staff and the Montgomery County Planning Board. The SEIS is also consistent with the recommendations of the Maryland State Planning Act and the Approved and Adopted White Oak and Fairland Master Plans. All parties concerned have worked long and hard to bring the FDA to White Oak and we appreciate the cooperation demonstrated by both the Food and Drug Administration (FDA) and the General Services Administration (GSA).

Two issues continue to be paramount in our review of the Draft SEIS: protection of the sensitive natural resources associated with the Paint Branch watershed and protection of the local neighborhoods from traffic by providing adequate roadway capacity and minimizing dependence on the single-occupant automobile.

As you know, the Paint Branch is an important stream in Montgomery County in that it supports a self-sustaining population of brown trout. Extensive monitoring has been charting the health in the ecosystem for many years and significant changes were made to master plans and zoning provisions in 1981, and strengthened in 1997, to protect the resource. Montgomery County, with assistance from the state of Maryland, has spent nearly \$20 million on the purchase of parkland to protect the headwaters of the stream. Stringent development standards (including strict imperviousness limits) have been established in the headwaters upstream of the FDA site. In addition, the Paint Branch is part of the Anacostia River watershed that is the subject of an

intense multi-jurisdictional restoration effort, including the U.S. Army Corps of Engineers. Any degradation of the resources in this part of the watershed will undermine those efforts.

We have reviewed the SEIS with the above considerations in mind and we offer the following comments:

Environmental features such as the Paint Branch and its tributaries, stream buffers, wetlands, steep slopes, and forest cover must be taken into consideration during site development and road access planning. On the attached map we have delineated the **environmental buffer** that incorporates steep slopes and large forest surrounding streams. This buffer must be protected to help reduce impacts of the FDA project on the aquatic resources of Paint Branch. Ideally, as we had recommended in past correspondence (letter from Jeff Zyontz to Harry Debes dated July 21, 2003), this environmental buffer area should be added to the county's greenways or parkland for conservation purposes. However, we recognize that since this property houses federal facilities, there may be security concerns that preclude unrestricted public access to this buffer area. Therefore, at a minimum, we would recommend that protection of this buffer as a conservation area be identified as an integral component of the FDA project. To achieve this, we recommend that you clearly show the environmental buffer as a protected conservation area on a plan drawing. This plan drawing should be included as part of any revised FDA master plan and the FEIS so that it is clear that environmental buffer preservation is a major objective for both the master plan and FEIS. GSA should give a clear, written commitment that the environmental buffer will be protected and managed as a natural conservation area to help mitigate impacts on important aquatic and forest resources, in keeping with the ecological significance of the Paint Branch and current efforts to protect the area.

Within the limits of the information contained in the SEIS, we support Road Option A because it is the closest alignment to the existing crossing of the Paint Branch and appears to have the least environmental impact. Design details and engineering information in the SEIS are inadequate and limit further comment at this stage. We expect that more detailed information (e.g. areas of cut and fill, location, types, and acreage of stormwater management facilities, etc.) will be available as the engineering and design process progresses, which will allow us to comment further on actions that should be taken/refined to reduce impacts on sensitive environmental areas along that alignment. Given the steep terrain that the road will traverse, we are particularly concerned that there is adequate land available for stormwater management quantity and quality controls. Measures to minimize forest loss and provide stringent sediment and erosion control measures during construction are also important.

We wholeheartedly support the FEIS statement that stormwater management facilities for FDA will be designed to meet requirements for new development, as opposed to less restrictive requirements for redevelopment. We would like clarification on whether these requirements result in stormwater management (SWM) for all impervious surfaces through to the full buildout of the project, or only impervious area that is added to what already exists. We believe that the

former SWM controls are needed. It is not clear from the SEIS whether SWM criteria for new development are also used for the new road. We recommend that these criteria also apply to this road. We were unable to determine whether the Maryland Department of the Environment (MDE) is reviewing SWM in concept as one entire project, or whether it was accepting each phase as a stand-alone. The former is more acceptable from an environmental protection/resource management standpoint.

We also believe that the FDA should seriously consider the removal of an existing concrete and rock structure in Paint Branch (currently a barrier to fish) as a measure to help mitigate environmental impacts of the FDA project.

The SEIS indicates both on-site and off-site transportation improvements which will help to mitigate the impact of FDA traffic, including a northeastern access from Cherry Hill Road. This access is recommended in the White Oak and Fairland Master Plans. We support the proposed northeastern access road to Cherry Hill Road through the adjacent Percontee property. Any of the alignment options described in the SEIS would satisfy the FDA transportation need and are consistent with the guidance in the Fairland Master Plan.

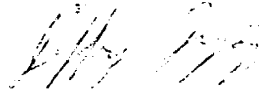
The proposed northeastern access road to Cherry Hill Road, by providing an alternative access to FDA, will provide the necessary mitigation for FDA traffic under the site "Build" scenario. This ultimate "Build" scenario presented in the SEIS represented a "worst-case" scenario, with approximately 1,000 additional parking spaces on the site in excess of the previously agreed to limit of 4,170 parking spaces (at a parking ratio of two parking spaces for every three employees vs. the FDA master-planned parking ratio of one parking space for every two employees). We continue to recommend that FDA pursue an aggressive trip reduction program that will further reduce its traffic impact on adjacent communities and roadways with a **practical** Transportation Management Plan (TMP). We request that the TMP be included as an element of the FEIS and look forward to working with your staff on the TMP elements.

Even though the FDA campus has mitigated its traffic impacts, congestion levels at several study area intersections are forecast to remain substandard. Our objective is to avoid as much congestion as possible by reducing the number of vehicles traveling to and from the FDA site in peak hours. We are convinced that an aggressive TMP effort could result in a demand for fewer parking spaces. Reducing the total number of cars driving to the site will have a positive effect on traffic congestion. The more the FDA construction schedule is extended, the greater the number of new employees who will likely choose to live in the eastern part of Montgomery County. Many of these employees may desire to locate in areas served by existing or future transit or within walking distance of the FDA site. Without speculating on this possibility, there is time in FDA's building schedule to determine the maximum number of employee parking spaces that will be needed. We still believe that the total number of employee parking spaces should be reduced.

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I will put this letter on the Planning Board's January 6, 2005, agenda to get their consent to its content. If you have any questions on the comments, please contact Mary Dolan at (301-495-4552) for environmental issues or Shahriar Etemadi at (301-495-2168) for transportation issues. Again, thank you for the opportunity to review the Draft SEIS.

Sincerely,



Jeffrey Zyontz, Chief
Countywide Planning Division

JZ:gw
Attachment