

M-NCPPC



MONTGOMERY COUNTY DEPARTMENT OF PARK AND PLANNING

THE MARYLAND-NATIONAL CAPITAL
PARK AND PLANNING COMMISSION

8787 Georgia Avenue
Silver Spring, Maryland 20910-3760
301-495-4500, www.mncppc.org

MCPB
Item No. 13
5-18-06

May 4, 2006

MEMORANDUM

To: Montgomery County Planning Board

Via: Gwen Wright, Acting Chief *GW/RCH*
Countywide Planning Division

Richard Hawthorne, Chief *RCH*
Transportation Planning

Bill Barron, Team Leader *BB*
Community Based Planning *BB*

From: Charles S. Kines, (301-495-2184) Transportation Planning Coordinator *CK*
for the Department of Planning

Subject: U.S. Food and Drug Administration Headquarters Consolidation 2006 Master
Plan Update and Transportation Management Plan: **Mandatory Referral 06805-
NCPC-1:**

RECOMMENDATION: Approval of staff comments submitted to the National Capital Planning Commission (NCPC) as the Board's position, and authorize staff to present it at the June 1, 2006 NCPC worksession concerning the Food and Drug Administration submittal.

BACKGROUND

The General Services Administration (GSA) has completed an updated master plan for the Food and Drug Administration (FDA) Consolidation in White Oak, reflecting the preferred alternative from the Environmental Impact Statement process completed in 2005. Staff responded with the April 28, 2006 correspondence contained in Attachment 1 to meet the requested NCPC timetable, and this letter will be in the Hearing record. **The purpose of this**

item is to review the staff comments in Attachment 1 and seek Planning Board's approval of those comments. The NCPC will be deciding on this item at their meeting on June 1, 2006 and either a Board member or Planning Department staff should present the Board's position to them at that time.

A copy of the full FDA submittal is in the Board's work area for Board members, and in Room 105 of the MRO, the Transportation Planning offices, for review by others.

The Planning Board reviewed the Draft Supplement Environmental Impact Statement for this project on January 6, 2005, during which the Board also received public testimony. The Chairman's follow-up letter to the General Services Administration (Attachment 2) requested that FDA develop a more detailed transportation management plan (TMP) as part of the Final Environmental Impact Statement (FEIS). Staff received a draft of the FEIS along with the enhanced TMP in March 2005 and promptly submitted comments on it to GSA on April 28, 2005 (Attachment 3).

SUMMARY OF STAFF COMMENTS

In March 2006, the final draft of the campus master plan, along with the final draft of the TMP, was submitted to Maryland-National Capital Park and Planning Commission for review and comment. Staff submitted comments to NCPC on April 28, 2006 (Attachment 1). In the letter, staff identified three key issues on which continuing coordination is required during the master plan implementation process:

1. Natural Resource Protection

- a. *Stormwater Management. Staff recommends that the Master Plan implementation should go beyond the stormwater management strategies proposed in the Landscape Concept Plan and use more Environmentally Sensitive Development (ESD) approaches and strategies to reduce reliance on traditional SWM wet ponds. Compared with strategies that disperse and infiltrate stormwater, stormwater management wet ponds are high in environmental impact. The Paint Branch, which will receive the runoff from this site, is identified by the State as a Use III stream, a designation given to high quality cold-water streams that support trout populations. The pond-dependent approach shown in the Landscape Concept Report (Appendix A) will have significant impacts on the receiving stream in the form of higher runoff volumes, higher runoff temperatures, and higher pollutant loads. The use of stormwater management wet ponds is especially to be discouraged in Use III watersheds.*
- b. *Environmental Protection Buffers. Staff urges FDA to clearly show the environmental buffer as a protected conservation area on the Landscape Concept Plan for the ultimate build out. Staff further urges FDA to more clearly commit to, and identify the strategies to protect and manage the environmental buffer as a natural conservation area to help mitigate impacts to important aquatic and forest resources in the environmentally sensitive Paint Branch watershed.*

2. *Transit Amenities.* The master plan main entrance forecourt improvements should reflect the on-site transit center currently being studied by the Washington Metropolitan Area Transit Authority (WMATA). In CY 2005, WMATA received a \$250,000 grant from the Federal Transit Administration to study and design this transit center. FDA and WMATA officials met with County representatives in late April 2006 to begin working on the scope of this study.
3. *Transportation Management Plan.* While the TMP is bold and aggressive, it lacks a mechanism for performance monitoring by, and accountability to the County and community representatives. Staff requests that FDA enter into a TMP Memorandum of Understanding similar to an arrangement between the County and the National Institutes of Health signed in 1992 (Attachment 4).

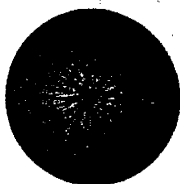
The NCPC will be holding a public hearing on the master plan and TMP on June 1, 2006. This public hearing provides the general public, as well as public agencies and other interest groups, with the final opportunity to submit comments on the master plan for the public record and have their ideas considered by GSA and FDA and potentially incorporated into the final master plan and TMP.

CK:gw
Attachments

mmo to MCPB re FDA

ATTACHMENTS

1. April 28, 2006 staff letter to NCPC
2. January 10, 2005 Planning Board Chairman letter to NCPC
3. April 28, 2005 staff letter to GSA
4. 1992 Transportation Management Plan MOU between the National Institutes of Health, the Montgomery County Planning Board and the County Department of Public Works and Transportation.
5. July 21, 2003 staff letter to GSA



THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION
Montgomery County Department of Park and Planning

April 28, 2006

Christine Saum, AIA, Director
Urban Design and Plan Review
National Capital Planning Commission
401 9th Street, NW
North Lobby, Suite 500
Washington, DC 20004

RE: 2006 Master Plan Update for Food and Drug Administration (FDA) Consolidation, White Oak; NCPC File No. MP 201

Dear Ms. Saum:

This letter provides staff comments from the Montgomery County Department of Park and Planning on the 2006 Master Plan Update for the Food and Drug Administration, per your March 9, 2006, request. We thank you for the opportunity to comment on the document and the continued coordination regarding campus development plans and proposals.

The 2006 Master Plan Update is generally consistent with the recommendations of the Approved and Adopted White Oak and Fairland Master Plans and appropriately reflects the findings of the March 2005 Final Supplemental Environmental Impact Statement (SEIS). Our April 28, 2005, comments on the Final SEIS are enclosed for your reference.

We are scheduled to present the staff comments described herein to the Montgomery County Planning Board on May 18 and will provide any additional guidance received from the Planning Board prior to your Commission meeting scheduled for June 1.

Based on the consistency of the 2006 Master Plan Update with prior planning efforts, our comments are oriented toward plan implementation activities, specifically relating to continued:

- strengthening of natural resource protection objectives
- implementation of public transit amenities
- monitoring of Transportation Management Plan performance.

Each of these comments is described in greater detail below.

Natural Resource Protection

Protection of the sensitive natural resources associated with the Paint Branch watershed is an issue that continues to be paramount in our consideration of the 2006 Master Plan Update.

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. M-NCPPC, 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 2006 Master Plan Update with the above considerations in mind and we offer the following comments on stormwater management and environmental buffer protection.

Stormwater Management

In our review of stormwater management (SWM) in the 2005 FEIS, we wholeheartedly supported the FEIS statement that stormwater management facilities for the FDA would be designed to meet requirements for new development, as opposed to less restrictive requirements for redevelopment. We also applauded the commitment to construct SWM facilities that provide 12-hour extended detention for the ultimate build-out condition in each drainage area, and not only for impervious area that is added to what already exists.

We are encouraged by the FDA's "Landscape Approach" that plans to integrate both landscape and building design into a unified environment. The plan proposes the use of site sensitive stormwater management strategies of open, grassed swales at roadways, directing runoff from impervious to pervious surfaces, water conservation through rainwater collection, and reduced consumption through the use of native plant materials, to accomplish this goal. These strategies are good and should be used more extensively to make a significant difference in lowering environmental impacts compared with traditional stormwater management. The three large stormwater management ponds could then be reduced in size or eliminated completely with the application of Environmentally Sensitive Development (ESD) approaches and techniques. Most, if not all, stormwater can be infiltrated back into the ground.

The depiction of the three stormwater management ponds seems to indicate that the proposed development of this site by the FDA is not using these techniques to their full advantage. Compared with strategies that infiltrate stormwater, stormwater management ponds are high in environmental impact. In addition, Paint Branch, the stream that receives drainage from this site, is classified by the State of Maryland as Use III. The Use III designation is given to high-quality, cold-water streams that support trout populations. The pond-dependent approach proposed for stormwater management for this site will have significant impacts on the receiving stream in the form of higher runoff volumes, higher runoff temperatures, and higher pollutant loads. The use of stormwater management ponds is especially to be discouraged in Use III watersheds.

Considering the high profile of this site and its intended use, along with the sensitive nature of the receiving ecosystem, it appears that this is a major opportunity to apply and showcase development that is truly environmentally sensitive. Consequently, we strongly recommend that the stormwater management strategy incorporate more infiltration and other ESD techniques that treat stormwater runoff, in order to eliminate or greatly reduce the need for stormwater ponds, and to improve as much as possible the quality of any runoff that does end up leaving the site.

Environmental Buffer Protection

The Landscape Concept Report correctly lists the mixed deciduous forest on the White Oak site as an environmental asset that should be preserved. In our previous comments, we asked that site development should be consistent with the Approved and Adopted White Oak Master Plan, which recommends that stream buffers must be provided as required by current County regulations, and that any areas appropriate for addition to the County greenways or parkland system be dedicated to this use. Our comments on the 2005 Final SEIS included a map, which delineated the environmental buffer that incorporates steep slopes and large forest surrounding streams on the FDA site. We urged that this buffer 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, Chief, M-NCPPC Countywide Planning Division to Harry Debes, Project Executive, GSA, dated July 21, 2003), this environmental buffer area should be added to the county's greenways or parkland for conservation purposes.

While the Final SEIS showed this environmental buffer, the Landscape Concept Plan does not. We continue to urge that FDA:

- Clearly show the environmental buffer as a protected conservation area on a plan drawing of the site that includes the ultimate buildout of FDA (including the new access road). This plan drawing should be included as part of the FDA master plan so that it is clear that environmental buffer preservation is a major objective for the master plan.
- Provide 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.

Finally, the limited design details and engineering information in the Master Plan Update preclude further comment at this stage. We look forward to receiving more detailed engineering and design information so that we may comment further on actions that should be taken to reduce impacts on sensitive environmental areas on the site.

Public Transit Amenities

We continue to view enhanced campus accessibility through an expanded regional bus transit service to the campus as a key component to the realization of a successful trip reduction program at the FDA White Oak Campus. We are especially encouraged about the new FDA shuttles to and from Twinbrook and Greenbelt Metrorail stations implemented during Fall 2005.

However, we urge GSA to go further. Early in the discussions about the FDA campus in 2000-2002, an on-site transit center for FDA employees had been considered. This facility would be separate but complementary to the new White Oak Transit Center on Lockwood Drive. In CY 2003, the County received a \$250,000 earmark in the federal budget to design this new transit center, and this money was turned over to the Washington Metropolitan Area Transit Authority (WMATA) in CY 2004. WMATA subsequently applied for and received a grant from the Federal Transit Administration in September 2005 to initiate the facility planning study. The grant guidelines require the WMATA to select a contractor to initiate the study by June 30, 2006. On April 24, 2006, representatives from the WMATA, the Montgomery County Department of Public Works and Transportation (DPWT) and FDA met to begin working on the scope for this study. The TMP and Master Plan should ensure that the main entrance forecourt design reflects this critical future improvement to enhance bus transit service to the campus.

Park and Planning staff believes that this on-site transit center would substantially bolster the percentage of both employee and visitor transit trips. Twenty-three Ride-On and Metrobus routes pass by very near the FDA Campus. FDA should take advantage of all available transit options, current and planned, and work with Metro and Ride-On to accommodate many of these routes at a FDA on-campus transit center. Continuing coordination should also address the potential for accommodating transit services from Cherry Hill Road across the campus.

Transportation Management Plan

We also remain concerned about accountability, performance monitoring, and enforcement of the TMP. In recent conversations with NCPC staff, our transportation planning staff confirmed that FDA alone is responsible for monitoring and evaluating its TMP, and that no other Federal agency oversees FDA to ensure compliance. We feel this is by far the TMP's most significant shortcoming. We therefore request that FDA and GSA enter into a Memorandum of Understanding (MOU) with the County – Park and Planning as well as DPWT – similar to the MOU the County has with the National Institutes of Health (NIH). For your convenience, a copy of the 1992 NIH MOU is enclosed.

Similar to the NIH MOU, an FDA MOU would require FDA to:

- submit an annual TMP performance report to the Planning Board, Director of DPWT and the NCPC
- ensure that FDA's Employee Transportation Coordinator (ETC) meets with the community and the County on a regular basis (at least semi-annually) to discuss traffic concerns and plan compliance

- submit semi-annual traffic counts of nearby intersections to the Planning Board
- re-assess transit and parking needs annually and actively strive to reduce parking demand
- consult with M-NCPPC, DPWT, and NCPC to adjust strategies should the plan fail to meet trip mitigation goals.

Also included in the MOU should be interim TMP performance goals and reporting requirements to allow FDA and GSA to determine whether trip reduction strategies are working or not, and if not working, to adjust TMP strategies and site amenities and possibly updating the parking ratios by reducing the number of on-site parking spaces. We believe this is important because the number of FDA employees transferred to the site will be incremental and phased. As a result, we believe the TMP likewise should be phased and monitored consistent with campus implementation phases. Staff also advocates that FDA and GSA include in the TMP more specific strategies to encourage visitors to travel to/from the site by transit, discouraging single-occupant travel to the site by visitors.

Staff notes that under the Comprehensive Plan for the National Capital, FDA is required to update its TMP at least every two years reflecting current employee levels. A TMP is also required with all master plans and with all projects that increase employment at a site by 100 or more employees. The MOU should incorporate and enhance the TMP review process already required by NCPC.

Overall, as we stated in our April 28, 2005, letter, we believe that the proposed FDA TMP is aggressive and bold, and would go a long way in reducing FDA's traffic impact at intersections along Cherry Hill Road and New Hampshire Avenue. We also believe that our suggestions as above will only make the plan stronger and more credible.

We will contact you following the Planning Board's review of these comments. If you have any questions regarding this correspondence in the interim, please contact Mr. Richard Hawthorne, Transportation Planning Chief, at 301-495-4525.

Sincerely,



Faroll Hamer
Acting Planning Director

DKH:kcw
Enclosures (2)



THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION
Office of the Chairman, Montgomery County Planning Board

January 10, 2005

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

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

Dear Ms. Decker:

Thank you for attending the Montgomery County Planning Board's January 6, 2005 meeting when we discussed our staff's comment on the DSEIS for the Food and Drug Administration's Consolidation at the Federal Research Center at White Oak. This letter is to memorialize the unanimous sentiments of the Planning Board for the record of the Supplemental SDEIS.

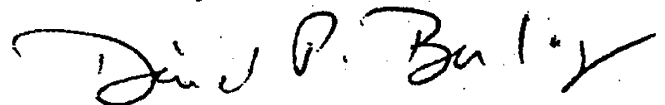
The Montgomery County Planning Board welcomes the successful consolidation of the Food and Drug Administration. We have concluded from our past deliberations that the FDA Consolidation is a project that is advantageous to the federal government, Montgomery County and the citizens of White Oak. There is nothing in the SDEIS that changes our conclusion. The specific proposal to add an eastern point of access to Cherry Hill Road will benefit future employees and the greater community even with 7,720 employees proposed at your site. The positive effects of the eastern access point are well documented in the SDEIS. Roadway improvement for the eastern access point and an increased percentage of trips coming to that new point of access, will allow intersections to generally remain at the same level of service that would have been expected with 5,947 employees. That being said, however, roadway congestion is an ever-present concern of the Planning Board.

We look forward to a continued positive relationship with you and the General Services Administration and the Food and Drug Administration particularly in the development of your Transportation Management Plan for the site. The Planning Board is interested in reducing

peak hour travel through methods that will be best received by FDA management and employees. A robust approach to such programs as staggered work hours, flexible work hours, ride sharing and transit incentives can lead to fewer peak hour trips than forecast in the SDEIS. A successful program can lead to a reduced demand for on-site parking below the NCPC maximum of one space for every 1.5 employees. We are not fixated on parking reduction on-site as the means to achieve fewer peak hour trips. We are interested in cooperating with you to find solutions that reduce single occupant vehicle travel in the peak hour.

Thank you this opportunity to comment. We look forward to our next opportunity to work with you on FDA's consolidation.

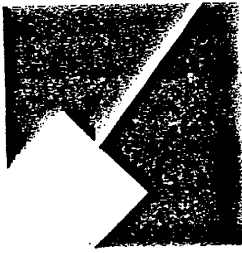
Sincerely,



Derick P. Berlage
Chairman

DPB:jz

M-NCPPC



MONTGOMERY COUNTY DEPARTMENT OF PARK AND PLANNING

THE MARYLAND-NATIONAL CAPITAL
PARK AND PLANNING COMMISSION

8787 Georgia Avenue
Silver Spring, Maryland 20910-3760
301-495-4500, www.mncppc.org

April 28, 2005

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

SUBJECT: Final 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 staff of the Montgomery County Department of Park and Planning on the March 2005 Final SEIS. We thank you for the opportunity to comment on the document.

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

Environmental Concerns and Comments

In reviewing the Final SEIS we continued to focus on two major issues: 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.

We note that the environmental buffer has not been widened to the extent that we recommended in our letter of December 22, 2004. This buffer helps to reduce impacts of the FDA project on the aquatic resources of Paint Branch. We also continue to recommend that, at a minimum, this buffer is designated as a conservation area that is part of the FDA project, and this designation is included as part of any revised FDA master plans. To achieve this, our recommendations specified in the December 22, 2004 letter could be followed: (1) Clearly show the environmental buffer as a protected conservation area or easement on a plan drawing. (2) Include this plan drawing as part of any revised FDA master plan so that it is clear that environmental buffer protection is a major objective for the master plan. (3) Make 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 of Paint Branch.

Although the Final SEIS assessment of water quality in the Paint Branch seems to be generally complete and accurate, the report's characterization of the conditions in Paint Branch, as stated on page 3-11, second paragraph, are somewhat misleading. The 1998 Countywide Stream Protection Strategy (CSPS) rates the Lower Mainstem subwatershed (which contains the FDA site) as 'Fair', and the subwatershed immediately upstream (the Middle Mainstem) as 'Good'. The Lower Mainstem is, as stated, a Watershed Restoration Area, but this designation is made in the 1998 report, not the 2003 Update (which does not deal with management categories). The 2003 Update to the CSPS rates subwatersheds, which are defined differently than those in the 1998 report. In the 2003 Update, the subwatershed immediately upstream of the FDA site (which is actually a portion of what was defined as the Lower Mainstem in the 1998 report) is rated 'Good'. The rest of what had been called the Lower Mainstem is not rated due to the lack of monitoring sites on the FDA campus. (The farthest downstream monitoring site is upstream of the FDA site.)

M-NCPPC supports the selection of Road Option A as it is the closest alignment to the existing Paint Branch crossing and seems to have the least environmental impact. The limited design details and engineering information in the Final SEIS limit further comment at this stage. We continue to be concerned that stormwater management facilities may result in the removal of large areas of mature forest, given the steep terrain that the road will traverse. We anticipate receiving more detailed engineering and design information so that we may comment further on actions that should be taken to reduce impacts, including minimizing forest loss, on sensitive environmental areas.

We are pleased that the Final SEIS states that stormwater management (SWM) facilities for the FDA will be designed to meet the more rigorous requirements for new development. We also applaud the commitment to construct SWM facilities that provide 12-hour extended detention for the ultimate build-out condition in each drainage area, and not only for impervious area that is added to what already exists.

Transportation Planning Issues and Comments

Staff is of the opinion that the proposed **on-site and off-site transportation improvements**, including the proposed northeastern access from Cherry Hill Road, in the Final SEIS will help mitigate the impact of FDA traffic. Staff supports the selected alternative for the northeastern access (Alternative 1) since both alignment options described in the Final SEIS would satisfy the FDA transportation needs and are consistent with the guidance in the White Oak and Fairland Master Plans.

In addition to the above physical improvements, staff continues to recommend that FDA **pursue an aggressive trip reduction program that will further mitigate its traffic impact** on adjacent communities and roadways with added features to the Transportation Management Plan (TMP) detailed in the Final SEIS. Even though the FDA campus traffic impacts would be mitigated, congestion levels at several study area intersections are forecast to remain over the policy area Critical Lane Volume (CLV) congestion standard. FDA's objective should be to avoid as much congestion as possible by reducing the number of vehicles traveling to and from the FDA site during peak commute hours. An aggressive TMP effort could result in fewer Single Occupant Vehicles (SOV) trips and a reduced demand for parking on the FDA campus, which in turn will have a positive effect on area traffic congestion. As staff noted in the past, the more the FDA construction schedule is extended, the more new employees will likely choose to live in the eastern part of Montgomery County in relative proximity to the FDA campus. Many of these employees may desire to locate in areas served by existing or future transit or within biking/walking distance of the FDA site. (Contrary to what is stated in the Final SEIS, Cherry Hill Road already is built with a Class I (off-road, shared-use) bikeway and New Hampshire Avenue is planned for Dual Bikeway.

Given that over 80 percent of current employees drive to work alone and a stated goal of achieving an ultimate Average Vehicle Occupancy (AVO) of 2.0, the targeted AVO of 1.5 at buildout in 2010 would be admirable. This translates to a 40 percent non-single-occupant driver mode share. The TMP identifies numerous strategies to help achieve the 1.5 AVO goal. To further enhance this worthwhile goal, staff offers the following comments:

- A shuttle to/from the Silver Spring Metrorail Station would be an enormous benefit to FDA employees and one of the most effective incentives to discourage single-occupant driving. It also could help FDA achieve an AVO goal of 2.0. However, the TMP states that federal law does not allow such a commuter shuttle, but at least one other federal agency (Walter Reed Army Medical Center in Silver Spring) has included such an employee commuter shuttles in their TMP. We request FDA and/or GSA to further investigate the issue.
- We agree that bus transit may be an unattractive commute option due to both the suburban nature of the campus and the reluctance of employees to walk across campus from their building to New Hampshire Avenue or the proposed

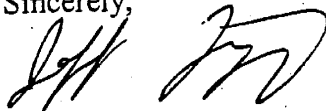
White Oak Transit Center along Lockwood Drive. Thus, providing a campus-only shuttle service to connect the buildings with New Hampshire Avenue and/or the White Oak Transit Center, with at least 10-minute headways during morning and evening peak periods, would likely attract many employees to take bus transit to/from the site. As the TMP states, as many as 20 current Ride-On and Metrobus routes pass adjacent to or very near the campus. The TMP should take advantage of this extensive existing bus service in the area.

- The proposed number of employee parking spaces (2 spaces per 3 employees, or approximately 5,140 spaces) appears to be inconsistent with the TMP. Assuming the stated 40% non-single-occupant driver mode share (30% carpool/vanpool, 10% transit) is achieved at buildout in 2010, only approximately 4,600 parking spaces would be needed (60 percent of 7,720 employees).
- Offering a parking cash-out program (assigning a value to each parking space and paying employees for not using one) would be a suitable alternative to reducing the number of parking spaces.
- We would recommend that the TMP more clearly identify monitoring and evaluation responsibilities, most importantly accountability. While the TMP states that the Employee Transportation Coordinator (ETC) will evaluate the effectiveness of the TMP on an annual or biannual basis, it does not specify to whom any related reports, traffic counts, evaluations, or employee survey results would be sent. We suggest that the ETC send bi-annual monitoring reports to the National Capital Planning Commission (NCPC), the GSA, and Commuter Services Section of the Montgomery County Department of Public Works and Transportation. If goals are not being met for an extended period of time (two reporting periods or one year), the TMP should require a meeting between the ETC and relevant agencies to evaluate program effectiveness and develop additional measures to reduce traffic to the site.
- Finally, we recommend the TMP include additional measures:
 - Offering a live-near-your-work incentive/program
 - Requiring deliveries to the site during non-peak periods
 - Offering flex-time/staggered work hours to all employees
 - Offering a pre-tax benefit for vanpool expenses (per Section 1 of Executive Order 13150)
 - Addressing visitor travel and parking issues

Overall, we think the proposed TMP is extensive and bold. We are, however, concerned that certain goals, such as the 40 percent carpooling/vanpooling mode share, may be unachievable at best and perhaps unrealistic due to historical trends away from carpooling/vanpooling in the Washington suburbs over the past years. For immediate results and long-term success of the TMP program, we recommend that employee commuter shuttles, both on campus and to/from the Silver Spring Metro Station, be

instituted as early in the build phasing as possible. This would better help the FDA attract its employees to commute by means other than single-occupant driving. Providing shuttles also would minimize the total number of vehicles traveling to and from the site, and thus would cause less impact to several nearby intersections, which even after planned improvements, will still operate above area congestion standard at full buildout.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Zyontz', written in a cursive style.

Jeffrey Zyontz, Chief
Countywide Planning Division

JZ:ss

MEMORANDUM OF UNDERSTANDING
BY AND AMONG THE
NATIONAL CAPITAL PLANNING COMMISSION,
THE MONTGOMERY COUNTY PLANNING BOARD OF THE
MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION,
AND THE NATIONAL INSTITUTES OF HEALTH

This memorandum of understanding (MOU) sets forth the agreement among the National Capital Planning Commission (NCPC), the Montgomery County Planning Board of the Maryland-National Capital Park and Planning Commission (MCPB), and the National Institutes of Health (NIH) regarding implementation of a Transportation Management Plan (TMP) for the NIH Bethesda Campus.

WHEREAS, the Comprehensive Plan for the National Capital urges that parking facilities at Federal facilities be provided and managed at a level which assumes maximum use of public transportation and high-occupancy vehicles.

WHEREAS, NCPC's Project Plans Submission Requirements require that sponsoring agencies' TMPs incorporate the following:

- o descriptions of existing and proposed peak hour traffic by mode
- o summary of existing and proposed parking by type and assignment
- o goals for trip reduction, modal split, and vehicle occupancy
- o strategies to minimize vehicle work trips and discourage single-occupancy commuting
- o discussion of projected transportation impacts and description of mitigation measures
- o description of applicable local, state, and regional transportation management requirements and recommendations for implementation
- o measures for monitoring and adjustment

WHEREAS, NIH has prepared a TMP that established program goals and short-term and long-term implementation strategies.

WHEREAS, on December 19, 1991, the MCPB recommended that NCPC defer action on the proposed parking garage and temporary parking lots located at the NIH Bethesda campus, until NIH satisfies the conditions and concerns identified in the MCPB staff memorandum of December 16, 1991, including a condition that NIH, NCPC, and MCPB execute an agreement to implement the TMP.

WHEREAS, the NCPC, on January 9, 1992, approved the preliminary plans for the garage and temporary lots with a request that NIH work with NCPC and MCPB to resolve outstanding issues related to the TMP including the establishment of a formal agreement respecting implementation of TMP strategies.

WHEREAS, on February 18, 1992, NIH, NCPC, and MCPB agreed to meet on a regular basis to exchange transportation, planning, and demographic information for the mutual benefit of all.

IT IS THEREFORE AGREED THAT:

1. NIH, NCPC, and MCPB will meet at a minimum of two times per year to discuss updated planning, master planning, project development, and transportation information, as well as outstanding issues that need to be resolved.
2. NIH commits itself to undertake its best faith effort to implement the TMP strategies in order to achieve TMP goals, and will take appropriate action regarding funding strategies. (TMP goals and strategies are listed in the attached Addendum.) To this end, NIH will monitor the success of the TMP strategies already implemented by providing NCPC and MCPB with quarterly traffic counts and annual evaluations. This data will be used in conjunction with supplementary transportation data such as the number of employees and visitors using public transportation, carpools, and vanpools, etc. to determine the overall effectiveness of the TMP in preventing additional NIH-generated peak hour traffic on roadways which serve the campus.
3. Consistent with this MOU and the NIH master plan, NIH will assess the need for parking associated with proposed future growth and attempt to reduce the future parking demand to the extent practicable.
4. NCPC and MCPB will evaluate the proposed future employment and parking growth at the NIH Bethesda campus in light of NIH's success in implementing TMP strategies and achieving TMP program goals.
5. NIH will implement other measures as appropriate, upon consultation with NCPC and MCPB, if current strategies prove unsuccessful.

THE NATIONAL INSTITUTES OF HEALTH

By: Bernadine Healy MAY 14 1992
Bernadine Healy, M.D. Date
Director

THE MONTGOMERY COUNTY PLANNING BOARD OF THE MARYLAND-
NATIONAL CAPITAL PARK AND PLANNING COMMISSION

By: Gus Bauman 5/2/92
Gus Bauman Date
Chairman

THE NATIONAL CAPITAL PLANNING COMMISSION

By: Glen T. Urquhart
Glen T. Urquhart Date
Chairman

ADDENDUM

GOALS OF THE NIH BETHESDA CAMPUS TRANSPORTATION MANAGEMENT PROGRAM

1. Improve the availability of parking spaces on campus for NIH personnel and visitors.
2. Mitigate the traffic impacts of further campus development on the roadways serving the NIH campus (such that the level of congestion along the roadways serving NIH is made no worse than if such development did not occur).
3. Maintain a "good neighbor" relationship with the surrounding community.

SHORT-TERM STRATEGIES

1. Establish an Employee Transportation Services Office to coordinate TMP strategies and promote non-single occupant travel modes by employees.
2. Continue to place carpool, vanpool, handicapped, and visitor parking in close proximity to the intended destination of the users. Disincentives will be enacted to discourage violation of carpool regulations.
3. Implement a transit discount program for employees up to the maximum tax-free benefit allowable by law, and initiate a request for legislative action to allow parking and ticketing revenues and/or appropriated funds to be used by NIH to make such a program self-sustaining.
4. Improve NIH campus shuttle bus service as demand warrants and provide adequate covered waiting areas at or near shuttle bus stops, where possible.
5. Implement a comprehensive campus-wide re-signage for vehicles and pedestrians, including a study of internal safety signage and signaling.
6. Emphasize parking regulation enforcement by providing an adequately staffed parking enforcement work force and provisions to minimize off-campus parking.
7. Further promote the use of flexitime and flexitour by employees. Reserve selected parking areas for later-arriving employees to encourage use of flexitime.
8. Have the employee transportation office publicize existing programs which utilize outlying parking areas, such as church lots and park-and-ride areas.
9. Institute pay parking for visitors to NIH, exclusive of patients and blood donors, except after normal working hours.

LONG-TERM STRATEGIES

1. As the campus develops, maintain the parking supply at no greater than 0.5 spaces per NIH employee, plus additional parking spaces to serve the parking needs of visitors and patients at NIH. In determining a parking supply, and applying a ratio not to exceed 0.5 spaces per employee, the number of employees used in this calculation should be no greater than the maximum employment level of the approved master plan.
2. Within the context of the development of the NIH master plan, the parking requirements associated with future campus growth and the reestablishment of the buffer zone surrounding the campus should be accommodated by the construction of multi-level parking (MLP) structures, within the parking supply criteria adopted by NIH. Planning and funding for these new MLP's should be linked to the funding plans for other buildings to be added to the campus.
3. Implement an internal loop road circulation system within the NIH campus, with two-way traffic.
4. Improve congested roadway intersections through the addition of more turning lanes to selected intersections adjacent to the NIH campus to mitigate traffic congestion. The Employee Transportation Services Office will coordinate with appropriate County and State agencies to determine funding strategies, design implications, timing, and implementation requirements.
5. Have the Employee Transportation Services Office explore the feasibility of developing or leasing satellite parking areas near outlying Metrorail Red Line stations to serve NIH employees.
6. NIH will continue to explore alternative strategies, and if all strategies fail to achieve the stated TMP goals, pay parking for employees will be instituted as a last resort.



THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

July 21, 2003

Mr. Harry Debes
Project Executive
General Services Administration
7th and D Streets SW, Room 2120
Washington, DC 20407

**SUBJECT: Supplemental Environmental Impact Statement (SEIS) for the FDA
Consolidation at the Federal Research Center at White Oak Scoping Meeting**

Dear Mr. Debes:

This letter provides requested comments from the Montgomery County Department of Park and Planning on issues that should be addressed in the Supplemental Environmental Impact Statement. We thank you for the opportunity to comment on the subject.

The FDA is a well respected "resident" of Montgomery County, with a reputation for excellence that reflects positively on the County and its citizens. We support the concept of the proposed consolidation at the White Oak site and remain committed to working with the FDA to ensure that it has the facilities that it needs to fulfill its national mandate. We offer the following comments as to how this might best be done within the natural and man-made conditions on the White Oak site and in conformity with approved area Master Plans and environmental guidelines.

Two issues are paramount in our consideration of the Supplemental EIS: protection of the sensitive 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.

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. 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 of 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. M-NCPPC, with the assistance of the state of Maryland, has spent almost \$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.

The protection of this vital stream and the forests and wetlands that assure the high quality cold water resources is essential in any accommodation of FDA's mission. Specifically, new crossings of the Paint Branch and further forest fragmentation must be avoided. My staff supports the widening of Dahlgren Road and the repair/replacement of the existing bridge at its current location as the best means of obtaining the multiple objectives of FDA's required development, Master Plan consistency, and environmental protection.

The consolidation of FDA and relocation of other facilities may increase the total number of employees to approximately 7,720. The Revised FDA Master Plan, the Fairland Master Plan and the White Oak Master Plan all indicate a number of transportation improvements that will help to mitigate the impact of FDA traffic. These improvements, however, may be inadequate to provide decreased levels of congestion in an area already impacted by heavy traffic. The Maryland State Highway Administration is designing a number of improvements along New Hampshire Avenue based on the assumption of 6,200 employees. A new traffic analysis should be made and must include a new access from FDA to Cherry Hill Road north of Powder Mill Road in Montgomery County as has been discussed for some time. Another option is to significantly reduce the congestion by reducing the number of vehicles traveling to and from the FDA site in the peak hours. FDA guidelines of one parking space for every two employees for federal facilities with this level of employment in its general location will be instrumental in helping reduce the total number of cars driving to the site and will have a positive effect on traffic congestion.

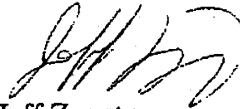
We take this opportunity to reaffirm our support for the Revised 2002 Plan and note its many positive changes regarding parking from the 1997 Plan. In particular, the concept that parking will be predominantly in structures should be carried forward to any additional parking proposed for the expanded employment. All structures should be kept out of the stream buffer areas, and the overall site imperviousness should be minimized. We also believe that accommodating public transit on site could benefit both employees and the surrounding community.

The Supplemental EIS should address how the proposed changes will be consistent with the Approved and Adopted White Oak Master Plan (see enclosed wording from the master plan). "The plan recommends that stream buffers must be provided as required by current County regulations, and that any areas appropriate for addition to the County greenways or parkland system be dedicated to this use." Also in terms of how the facility will relate to the surrounding community, the White Oak Master Plan recommends that "Development must be compatible with the adjacent single-family neighborhood character."

Mr. Harry Debes
July 21, 2003
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Should you or your staff have any questions, please feel free to contact Bill Barron of my staff at (301) 495-4556. Again thank you for the opportunity to provide preliminary comments on potential impacts, and potential issues for the proposed FDA consolidation at White Oak. We do look forward to making more specific comments and assisting in identifying alternatives, when the Supplemental Environmental Impact Statement becomes available.

Sincerely,



Jeff Zyontz
Chief, County Wide Planning

JZ:kcw
Encl.