



U.S. FOOD AND DRUG ADMINISTRATION MUIRKIRK ROAD CAMPUS MASTER PLAN

Draft Environmental Impact Statement
Appendix C – Section 106 Consultation

June 2021

Prepared by:



In cooperation with:



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Larry Hogan, Governor
Boyd Rutherford, Lt. Governor



Robert S. McCord, Secretary
Sandy Schrader, Deputy Secretary

Maryland

DEPARTMENT OF PLANNING

MARYLAND HISTORICAL TRUST

March 4, 2021

Todd Satter
Historic Preservation Specialist
US General Services Administration, National Capital Region
1800 F Street, NW
Washington, DC 20405-0002
Sent via email to: todd.satter@gsa.gov

Re: Identification of Historic Properties for Campus Master Plan
U.S. Food and Drug Administration (FDA), Muirkirk Road Campus and East Parcel
Prince George's County, Maryland

Dear Mr. Satter:

Thank you for your recent letter, received by the Maryland Historical Trust (Trust) on February 5, 2021, continuing consultation for the above-referenced proposed undertaking. The submittal provided the Trust with a report on the recent Phase I archeological survey conducted of the Muirkirk Road Campus and East Parcel along with a Determination of Eligibility form for the facility, for review and comment. GSA completed the investigations in fulfillment of its responsibilities under Sections 106 and 110 of the National Historic Preservation Act of 1966. The Trust, Maryland's State Historic Preservation Office, reviewed the submitted materials and we offer the following comments.

Phase I Archeological Survey: Trust staff reviewed the following report prepared for GSA by Stantec Consulting Services, Inc.: *U.S. Food and Drug Administration Muirkirk Road Campus Master Plan, Phase I Archaeological Investigations, Prince George's County, Maryland* (January 27, 2021). The report provides detailed documentation on the goals, methods, results, and recommendations of Phase I survey conducted of the entire property. The document meets the reporting requirements of the Trust's *Standards and Guidelines for Archeological Investigations in Maryland* and we accept the current version as the final document for our Library.

The survey identified one newly inventoried site, 18PR1198, located on the East Parcel. Site 18PR1198 consists of a moderate scatter of prehistoric lithics (59 artifacts) and three historic artifacts recovered from 41 shovel test pits. Diagnostic artifacts indicate occupation during the Middle Archaic – Early Woodland periods. The site likely represents a repeatedly utilized short term camp or processing station. Based on the information presented in the report, we agree that Phase II archeological investigations would be warranted to conclusively evaluate the site's eligibility for the National Register of Historic Places, if the site is slated for disturbance in the future. We understand that under the current master plan no development actions are planned for the East Campus, where site 18PR1198 is located. Thus, the current undertaking is unlikely to affect this archeological site.

We note that Section 2.4 Curation of the report states that the artifacts and project documentation will be submitted to FDA for curation. We would like to inquire where FDA intends to curate these materials. As you know, the artifacts and related records are tangible remains of the archeological record and should be curated in accordance with applicable federal standards (36 CFR Part 79) that ensure their security, appropriate care, and accessibility for research and interpretation. As the site may be slated for Phase II evaluation at some point in the future, it is important that the items are maintained in a manner that will ensure their accessibility for future study. We strongly encourage FDA and

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GSA to consider curating the materials at the Maryland Archeological Conservation Laboratory (MAC Lab), where they would receive appropriate care and be accessible. We understand that GSA's National Capital and Northeast Regions already have a formal collections agreement with the MAC Lab to curate federal collections from the region. GSA should add the collection from 18PR1198 to its other collections currently curated at the MAC Lab. For further assistance regarding curation at the MAC Lab, please contact Sara Rivers-Cofield, Curator of Federal Collections, at sara.rivers-cofield@maryland.gov.

Determination of Eligibility (DOE) form: Trust staff also reviewed the DOE form on the U.S. Food and Drug Administration Muirkirk Road Campus and East Parcel, prepared for GSA by Quinn Evans. The form identifies and evaluates the National Register eligibility of the facility and we appreciate GSA's comprehensive approach to its identification efforts for the property. The facility is comprised of several complexes developed over the last 58 years with dates of construction ranging from 1963 – 2005. Based on the information presented in the DOE, the Trust concurs that the U.S. Food and Drug Administration Muirkirk Road Campus and East Parcel does not meet the criteria for eligibility in the National Register of Historic Places.

In order for the Trust to formally document this eligibility evaluation in the Maryland Inventory of Historic Properties (MIHP), we require the following items be amended and the documentation resubmitted to the Trust.

- A MIHP number must be requested from- Mary Kate Mansius, the Inventory Registrar (mary.mansius@maryland.gov). This number must then be incorporated into all the documents.
- The provided DOE is for the built resources not the archeology site and the preparer's recommendation should be changed to not eligible with no criteria or considerations marked on the first page.
- The section discussing Criteria D on continuation sheet 17 should be removed as it does not relate to the built environment as well as the eligibility summary.
- The attachments that have watermarks over the images which say copyrighted material should be removed from the document.
- A Photo Log listing the images and file names must be prepared
- A hard copy of the DOE form and all attachments must be prepared
- An archival CD/DVD with a electric copies of the form and photos

We appreciate GSA's ongoing efforts to identify and evaluate historic and archeological resources at federal facilities in Maryland. If you have questions or need further assistance, please contact me (for historic structures) at amanda.apple@maryland.gov or Beth Cole (for archeology) at beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,

Amanda R. Apple (signed electronically)

Amanda R. Apple
Preservation Officer, Project Review and Compliance

BC/ARA/202100446

cc: Sara Rivers-Cofield (MHT/JPPM sara.rivers-cofield@maryland.gov)
Ruth Mills (Quinn Evans rmills@quinnevens.com)



National Capital Region

February 4, 2020

Ms. Elizabeth Hughes, SHPO
Maryland Historical Trust
100 Community Place
3rd Floor
Crownsville, MD 21032-2023

Re: Determination of National Register Eligibility
U.S. Food and Drug Administration (FDA), Muirkirk Road Campus (MRC) and East Parcel in
Beltsville, MD

Dear Ms. Hughes:

The U.S. General Services Administration (GSA), in accordance with Section 110 of the National Historic Preservation Act (NHPA), is submitting the enclosed Determination of Eligibility for the Food and Drug Administration (FDA) Muirkirk Road Campus (MRC) and East Parcel, located at 8501 Muirkirk Road and 8301 Odell Road, respectively, in Beltsville, MD 20705, for review and concurrence by your office. GSA is currently developing a campus master plan on behalf of the FDA.

The U.S. Food and Drug Administration (FDA) Muirkirk Road Campus (MRC) comprises two parcels. The main MRC campus is a 197-acre parcel that includes the Beltsville Research Facility (constructed in the 1960s), the Module I/Module II complex (constructed from 1983 to 1996), and the Animal Research Facility (constructed in the late 1990s). The East Parcel includes the Maryland Army National Guard (constructed 1990s) and the South Laurel Water Pumping Station (constructed 1980s), as well as undeveloped land. The MRC campus houses the Center for Veterinary Medicine (CVM) and the Center for Food Safety and Applied Nutrition (CFSAN) within 29 buildings of office space, laboratories, animal research, and support buildings.

The FDA's Muirkirk Road Campus was evaluated in relation to historic contexts established in the *Maryland Preservation Plan*, including agriculture, economy and industry, and African American heritage under NHPA criterion A, as well as criteria B and C. In addition, a phase I archaeological survey evaluated the site's eligibility under Criterion D.

The MRC site supported agriculture during the nineteenth and early twentieth centuries, and the mine pits on the west portion of the MRC reflect Prince George's County industrial past. However, despite the pastoral character of the campus, the site retains few features associated with the previous agricultural or industrial uses of the property. Subsequent development of the site, including the conversion of this area into wetlands and ponds and the redeposition of soils, have further compromised the site's historic integrity. Previous surveys and current research have also failed to document any connection between the MRC site and the nearby historic community of Rossville or to African American history.



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The FDA constructed one campus building, the Special Pharmacological Animal Laboratory (SPAL), more than 50 years ago. A single-story, utilitarian brick building built in 1963, SPAL has undergone extensive exterior and interior renovations, and the original kennels, which were the most significant architectural features, have been demolished. The remaining buildings on the campus were constructed in the 1980s and 1990s, and the design of the campus also dates to less than 50 years ago. Neither the campus nor the recent buildings qualify as exceptional.

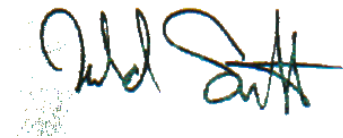
A Phase I Archaeological Survey (attached) was conducted for the MRC as part of the current planning process. Neither the current survey nor previous archaeological investigations in 1981 recovered artifacts or archaeological resources within the main parcel of the MRC. One pre-contact site was identified on the East Parcel, and the report recommends that this site (18PR1198) be considered potentially eligible for listing in the National Register of Historic Places under Criterion D, pending further testing to evaluate the characteristics and features of the site's occupation and to confirm its eligibility for listing.

It is GSA's determination that the property lacks sufficient significance and integrity to qualify as an eligible property for the National Register of Historic Places under Criteria A, B, and C. It is GSA's determination that site 18PR1198 on the East Parcel is potentially eligible for listing on the NRHP under Criterion D.

We have enclosed the completed MHT Determination of Eligibility Form and the Phase I Archaeological Report, as well as current and historic maps and photographs, for evaluation by MHT. We also have a virtual campus tour, which we can share as a digital file, and we would be happy to organize a site visit if necessary.

We look forward to your review of the Determination of Eligibility Form, Phase I Archaeological Report, and supporting documentation. If you have any questions, please contact me at (202) 256-7926 or todd.satter@gsa.gov.

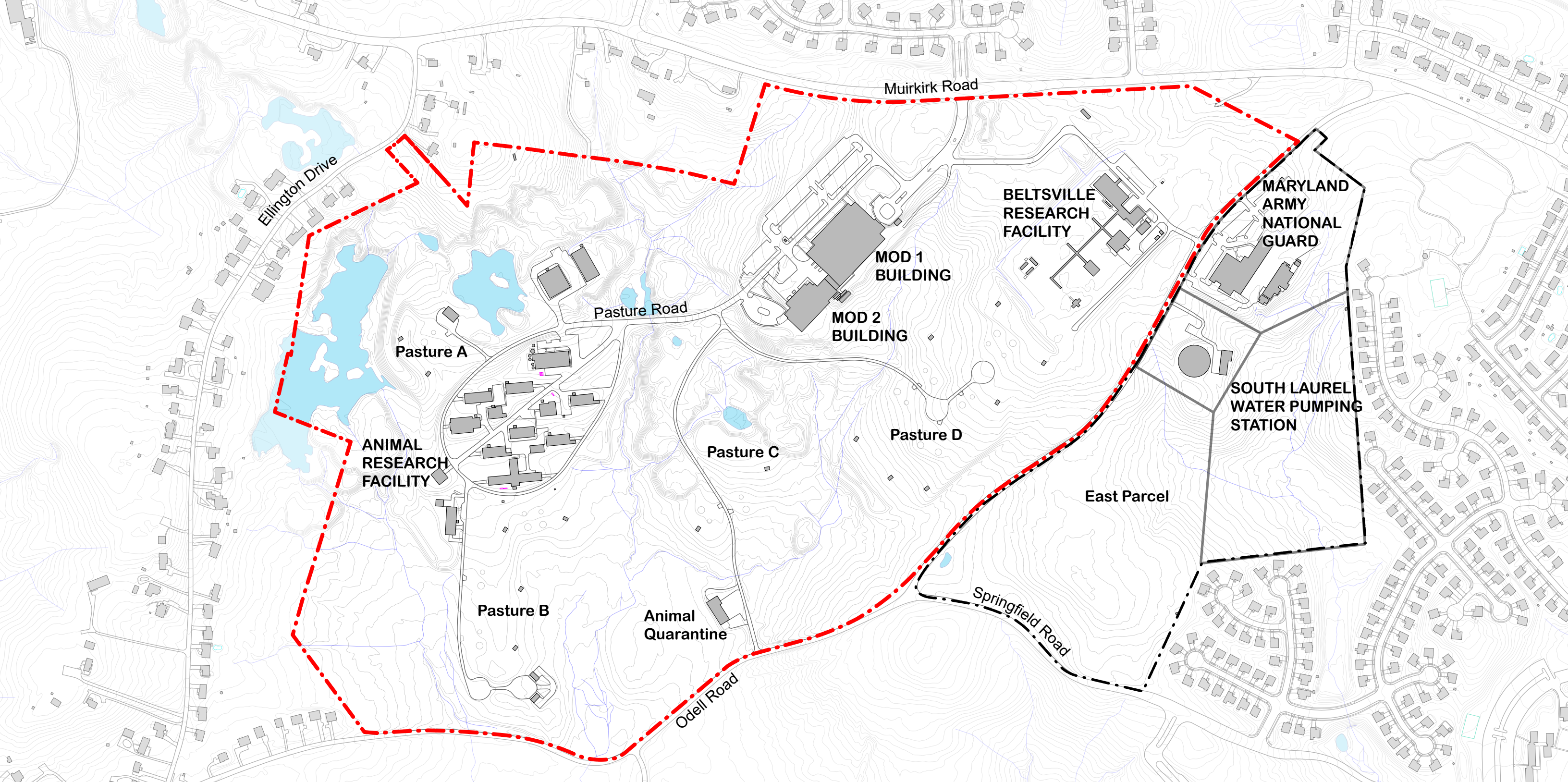
Sincerely,

A handwritten signature in blue ink, appearing to read "Todd Satter", with a stylized flourish at the end.

Todd Satter
Historic Preservation Specialist

Enclosures:
MHT Determination of National Register Eligibility Form
Phase I Archaeological Investigations Report
Continuation Sheet: Maps and Photographs
Site Plan

cc: Beth Cole, Maryland Historical Trust
Amanda Apple, Maryland Historical Trust



LEGEND

-  Bodies of Water
-  Stream
-  Existing FDA MRC Campus Boundary
-  Secondary Property Boundary
-  East Parcel Boundary



**MARYLAND HISTORICAL TRUST
DETERMINATION OF ELIGIBILITY FORM**

NR Eligible: yes ☐
no ☐

Property Name: U.S. Food and Drug Administration
Muirkirk Road Campus and East Parcel Inventory Number:

Address: 8501 Muirkirk Road City: Beltsville Zip Code: 20705

County: Prince George's USGS Topographic Map: Laurel

Owner: United States of America Is the property being evaluated a district? Yes yes
no ☐

Tax Parcel Number: Multiple Tax Map Number: 0014 Tax Account ID Number: Multiple (see below)
General Services Administration (GSA) on

Project: FDA Muirkirk Road Campus Draft Master Plan Agency: behalf of Food & Drug Administration (FDA)

Site visit by MHT Staff: No no ☐ Name: Date:

Is the property located within a historic district? yes yes ☐ No no no ☐

If the property is within a district

District Inventory Number:

NR-listed district yes yes ☐ Eligible district yes yes ☐ District Name:
Contributing

Preparer's Recommendation: resource yes yes ☐ no ☐ Non-contributing but eligible in another context

If the property is not within a district (or the property is a district)

Preparer's Recommendation: Eligible X yes ☒ no ☐

Criteria: A B C X D Considerations: A B C D E F G X None

Documentation on the property/district is presented in: Project Review and Compliance Files

Description of Property and Eligibility Determination: *(Use continuation sheet if necessary and attach map and photo)*

Muirkirk Road Campus:

Address: 8501 Muirkirk Road, Beltsville, MD 20705
Owner: United States of America
Tax Parcel: 0119
Tax Map #: 0014
Tax ID: District 01, Account 0070102
Acres: 197.16

East Parcel:

Address: 8301 Odell Road, Beltsville, MD 20705
Owner: United States of America
Tax Parcel: 0121
Tax Map #: 0014
Tax ID: District 10, Account 1124262
Acres: 52.11

MARYLAND HISTORICAL TRUST REVIEW

Eligibility recommended Eligibility not recommended

Criteria: A B C D Considerations: A B C D E F G None

Comments:

Reviewer, Office of Preservation Services

Date

Reviewer, NR Program

Date

MARYLAND HISTORICAL TRUST NR-ELIBILITY REVIEW FORM

Continuation Sheet No. 1

MIHP No: _____

Both parcels are zoned R-O-S, Reserved Open Space, by Prince George's County. R-O-S is defined by the county as "Provides for permanent maintenance of certain areas of land in an un-developed state, with the consent of the property owners; encourages preservation of large areas of trees and open space; designed to protect scenic and environmentally sensitive areas and ensure retention of land for nonintensive active or passive recreational uses; provides for very low density residential development and a limited range of public, recreational, and agricultural uses."¹

ELIGIBILITY SUMMARY

The US Food and Drug Administration's Muirkirk Road Campus was evaluated in relation to historic contexts established in the statewide *Maryland Preservation Plan* (2005), Maryland-National Capital Park and Planning Commission's *Illustrated Inventory of Historic Sites and Districts, Prince George's County, Maryland* (2011) and *African-American Historic and Cultural Resources in Prince George's County, Maryland* (2012). It was evaluated under Criterion A in the context of Agriculture, Economy/Industry, African American Heritage, and the Federal Presence in Prince George's County, and under Criterion C in the context of Architecture, and found not eligible for the National Register of Historic Places (NRHP) under those criteria and contexts. There are no significant individuals associated with the MRC under Criterion B. The Phase I Archaeological Survey carried out concurrently with this Determination of Eligibility recommended that one pre-contact site on the East Parcel is potentially eligible, pending further archeological research, for listing in the NRHP under Criterion D.

DESCRIPTION OF PROPERTY

INTRODUCTION

The US Food and Drug Administration (FDA) Muirkirk Road Campus (MRC) is located in northern Prince George's County, Maryland, approximately midway between Washington, DC, and Baltimore, Maryland. It lies approximately two miles east of the terminus of Maryland Route 200 at Baltimore Avenue, and approximately one mile west of the Baltimore/Washington Parkway. The FDA's headquarters at the Federal Research Center at White Oak is approximately six miles west, while the FDA's Center for Food Safety and Nutrition's main offices are six miles south in College Park, Maryland (Figure 1).

The MRC consists of two parcels. The main MRC campus is on a 195-acre parcel which contains three main areas: the Beltsville Research Facility (constructed in the 1960s), the Module I/Module II complex (constructed in phases from 1983 to 1996), and the Animal Research Facility (constructed in the late 1990s). The Maryland Army National Guard (constructed early 1990s) and the South Laurel Water Pumping Station (constructed early 1980s) occupy portions of the East Parcel, with the rest remaining undeveloped.

The MRC houses the Center for Veterinary Medicine (CVM) and the Center for Food Safety and Applied Nutrition (CFSAN) within 29 buildings of office space, laboratories, animal research, and support buildings for a total of approximately 1.6 million square feet and 32 acres of pastures. Eighteen of the 29 buildings on the site are primarily used as labs and animal research buildings (see Resource Table, below). The site has internal service roads and surface parking, pastures, stormwater management ponds, tree conservation areas, and wetland preserves.

For parcel boundaries and sub-area locations, see attached "Determination of Eligibility Site Map". For current photographs and historic images, see attached figures. Note that due to security protocols, photography was only allowed in the Beltsville Research Facility and Module I/Module II complexes. No photography was permitted in the Animal Research Facility or pasture areas aside from Pasture D south of the BRF complex, and no interior photography was permitted in any of the facilities.

¹ "Guide to Zoning Categories: Prince George's County, Maryland," (Upper Marlboro, MD: Maryland-National Capital Park and Planning Commission, Prince George's County Planning Department, November 2010), <https://www.mnecppc.org/DocumentCenter/View/1366/Guide-to-Zoning-Categories-PDF?bidId=>, accessed January 11, 2021.

**MARYLAND HISTORICAL TRUST
NR-ELIBILITY REVIEW FORM**

Continuation Sheet No. 2

MIHP No: _____

FDA MUIRKIRK ROAD CAMPUS

Setting

The Muirkirk Road Campus is a roughly triangular shaped parcel bounded approximately by Muirkirk Road to the north, Odell Road to the east and south, and the rear line of residential parcels along Ellington Drive to the west. Private subdivisions are located on the west side of the campus along the east side of Ellington Drive and in the northwest corner, southeast of the intersection of Muirkirk Road and Ellington Drive. North of Muirkirk Road are single-family residential subdivisions. Also north of Muirkirk Road is a greenway running east to west containing PEPCO transmission lines. To the east is the East Parcel (described below) while to the south is a wooded area including the US Department of State Beltsville Information Management Center. North and west of the MRC is the Rossville Historic District (MHT Inventory Number PG:62-23), a district of vernacular residential and community buildings along Old Muirkirk Road, which extends north of Muirkirk Road just west of Ellington Drive, and the historic Muirkirk School (current American Legion Post) on the south side of Muirkirk Road between Ellington Drive and Old Muirkirk Road (Figure 2).

The area's general character comprises institutional complexes and residential subdivisions set on small open green spaces within larger wooded areas, consistent with the pastoral character of this area of Prince George's County. Historically an area of farms and woodlands, the region has been more intensely developed in recent decades. Roads in the area are generally two lanes without sidewalks and with variable-width shoulders.

Overall Landscape Description

The MRC consists of three main areas: the Beltsville Research Facility (BRF) at the northeast corner, the Module I/Module II (Mod I/II) complex to the south and west, and the Animal Research Facility to the southwest of Mod I/II. These areas are spatially oriented 45 degrees from the north-south axis. Four open pastures (A, B, C, and D) are located to the south and west of the facility areas (Site Map and Figure 3).

Topographically, the high point of the property is along Muirkirk Road (Figure 4), sloping down to the south and west. The BRF and Mod I/II occupy the level areas at the northeast corner of the site. The site slopes steeply in the central section down to the relatively level southwest corner. The MRC is in the Upper Beaver Dam Creek Watershed. Three natural stream valleys originate in the north, northwest, and west areas of the campus and run south and west to the low point on Odell Road in the south. These are wooded along their banks. Several small natural water bodies are located along the stream valleys, and three large ponds created by former gravel pits occupy the western edge of the campus. Vegetation is a mixture of large areas of dense deciduous trees and individual shade trees, with thick ground cover in wooded areas. Mown grass areas include the pastures and the areas around the buildings which have some irregularly placed ornamental and shade trees. Small planting beds provide visual interest in driveway areas and near buildings. The buildings have minimal foundation plantings, with just a few trees and shrubs.

The principal road through the campus, Pasture Road, runs from the main entry at Muirkirk Road south and west. As it enters the property, it is aligned with the northeast elevation of Mod I, then jogs west and southwest again to run between Mod I/II and a large parking lot to the west of those buildings. It continues southwest to the Animal Research Facility, where it splits to form a loop around the buildings and a central drive through the middle. There are also several secondary roads. At the northeast end, a drive runs from Pasture Road near the main entry to the BRF area and then connects with Odell Road. To the southwest of Mod I/II, a drive splits immediately east of the road (Figure 5); the northern section leads to two cul-de-sacs at the center of Pasture D, while the southern section continues south through Pasture C to the animal quarantine facility and another gate to Odell Road. From the loop road at the Animal Research Facility, a dead-end drive runs on the west side of Pasture B to two paved cul-de-sacs. Within the campus there are also several smaller spur roads leading to parking areas or around buildings. All roads within the campus are asphalt with no shoulders or sidewalks.

The campus is surrounded by a tall chain-link security fence. Pastures are also surrounded by chain link fences, while individual fields within the pastures are separated by wood post and barbed wire fences.

Topography and vegetative cover limit views into and out of the campus, particularly in the summer. Portions of the campus are visible from entry points, including the main entry on Muirkirk Road (Figure 6), the entry to the BRF on Odell Road just south of Muirkirk Road (Figure 7), and the entry to quarantine facility farther southwest on Odell Road south of Springfield

MARYLAND HISTORICAL TRUST
NR-ELIBILITY REVIEW FORM

Continuation Sheet No. 3

MIHP No: _____

Road (Figure 8). Each of the three facilities as well as the major circulation routes are also surrounded by vegetation, limiting views to other parts of campus. More expansive views are present within the BRF and the adjoining pasture D, and within the Animal Research Facility and adjoining pastures A and B.

Beltsville Research Facility and Pasture D

Site

The Beltsville Research Facility occupies the northeast corner of the MRC. It sits on level ground, while Pasture D to the south slopes gently to the southwest. At the northeast end of the BRF is the asphalt-paved drive between Odell Road and Mod I/II. On the north side of the drive is a small rectangular parking lot (Figure 9). South of the drive is the main BRF facility, the Special Pharmacological Animal Laboratory (SPAL), consisting of two rectangular footprints, one large and one small, connected by a covered breezeway. Extending south from the breezeway is a long, covered walkway with three shorter covered crosswalks. To the east of the main building and covered walkway are three steel barn buildings; the northern two have asphalt parking areas around them. A gravel drive leads from this parking area south to a utility building, then curves west to form a loop around a complex of three utility buildings. Another gravel drive is located on the east edge of the BRF facility dead-ending at Pasture D (Figure 10).

The area at the front of the SPAL building and parking lot has ornamental plantings including holly, roses, and crepe myrtle. A sidewalk lines the south edge of the driveway between the building and the parking area. At the east end of the sidewalk is an L-shaped 4-foot-high stone wall that partially screens the loading dock between the two buildings (Figure 11).

BRF Main Building (Special Pharmacological Animal Laboratory)

The SPAL was built in 1963 as the Special Pharmacological Animal Laboratory's administration building. It was designed by the George M. Ewing Company, a Philadelphia-based firm with offices in Washington, DC, for the GSA's Region 3 Design and Construction Division.² The company had several concurrent federal government contracts, including the US Naval Academy in Annapolis, Maryland, and St. Elizabeth's Hospital in Washington, DC. SPAL is a one-story, rectangular building with a flat roof. It is constructed of beige brick with a flat, slightly recessed stucco fascia spanning the area between the window lintels and the aluminum roof coping.

A rectangular aluminum canopy with a low-sloped gable roof carried on square aluminum-clad columns extends from the main entry in the center of the northeast elevation, sheltering the sidewalk to the entrance. A partial height brick wall screens the southeast side of the covered walk. Across the northeast elevation are eight window/door bays divided by narrow brick piers and flanked by blank brick walls at the ends (Figures 12 and 13). The main entry is located in the fifth bay from the southeast end (Figure 14). It consists of paired aluminum-framed glass doors with sidelights and transoms. The window bays are filled with large, fixed plate-glass windows in aluminum frames divided horizontally into a large middle section and narrower sections at top and bottom. A vertical aluminum mullion is placed asymmetrically on each bay and projects above the window lintels into the fascia area. At the south end of the northeast elevation is a bronze plaque reading "U. S. Department of Health, Education & Welfare: Food and Drug Administration: Pharmacological Animal Laboratory: 1963" (Figure 15).

The northwest elevation (Figure 16) is asymmetrical, with two window bays at the northeast end and three at the southwest end, separated by a blank brick wall. Like the northeast elevation, the window bays are divided by narrow brick piers. The windows are identical to those on the northeast elevation, except for the third bay from the southwest end which has a single-leaf aluminum and glass door in the narrower side. Utility equipment is installed on this elevation.

The southeast elevation (Figure 17) faces the loading dock, and the only openings are two full-height door bays with utilitarian steel doors with porcelain transoms. A louvered vent is set on the northeast end, and a metal roof access ladder is attached to the wall next to the northeast door. A concrete sidewalk runs along this elevation to the loading dock, which is covered by a metal canopy between the main building and the service building at the southwest side of the elevation.

² George M. Ewing, Co. Architects and Engineers, "Pharmacological Laboratory Buildings," Construction Drawing Set prepared for General Services Administration, Design and Construction Division Region 3, 1962, scanned set provided by US Food and Drug Administration.

MARYLAND HISTORICAL TRUST
NR-ELIBILITY REVIEW FORM

Continuation Sheet No. 4

MIHP No: _____

The southwest elevation (Figure 18) has six narrow window bays with aluminum and glass windows. The horizontal proportions of the windows are similar to those on the northeast and northwest elevations, but the windows are much narrower and the brick walls separating them are wider, with the exception of the wall between the two windows at the northwest end. Two large concrete pads along this elevation hold HVAC equipment that obscures much of the elevation, and large chases on the roof connect to the equipment to vent the laboratory spaces in the building.

The building interior consists of a rectangular double-loaded corridor with laboratories and offices in the center and around the perimeter. Larger rooms are located at the northwest and southeast ends. The main entry opens into a small reception/lobby space, and there is another small lobby at the southwest end of the building leading to the loading dock. The interior was remodeled in 2005 and the finishes date to then.

Integrity: Original elements of the building include its form and massing, brick walls, and the locations of the window bays and doors. The main entry has a similar configuration to the original, but the doors and frames are replacements. The largest impacts to integrity are the windows and the interior. The 1962 design drawings show that the windows on the northeast and northwest elevations were originally symmetrical in design, with a full height mullion dividing the two sides. The horizontal proportions are similar, but the wider central section was divided vertically into two symmetrical halves, and there was a small operable window in the lower portion of the center sections. The narrow upper section was a porcelain panel rather than glass. The door on the northwest elevation was also added. On the southwest elevation, an extra window bay has been added on the northwest end, and these windows also had operable sash on the lower part of the central sections. The two doors on the southeast elevation were originally symmetrical double doors. While the general layout of the interior is similar, the building interior has been extensively remodeled; no original finishes remain.

BRF Service Building

The Service Building was also built in 1963 and designed in conjunction with the administration building. It is a one-story, rectangular building with a flat roof (Figures 19 and 20). It is constructed of beige brick with a flat, slightly recessed stucco fascia spanning the area between the window lintels and the aluminum roof coping. The northeast and southwest elevations each have two equidistant window bays spanning from the ground to the fascia. At the northeast elevation, both bays have centered vent panels with small horizontal windows below, and porcelain panels at top and bottom, while at the southwest elevation, one bay is covered with a stucco panel while the other has a centered fixed pane window with dark glass panels at the top and bottom. There are three equidistant bays on the southeast elevation. Two have centered fixed-pane windows with dark glass panels above and below, while the northeastern bay has a single-leaf steel door with a louvered transom. Adjacent to this door, the brick wall has been covered with a vertical wood panel. The northwest elevation has three door bays, two at the southwest end and one at the northeast end. The northeast end bay has symmetrical paired steel doors with small glass viewing panels in each leaf and a metal transom above. The two southwest bays have single-leaf steel doors, each with a metal sidelight and transom. A concrete sidewalk runs along this elevation to the loading dock, which is covered by a metal canopy between the administration and service buildings at the southwest end of the building. This building has utility equipment attached to the elevations and roof.

Integrity: Original elements of the building include its form and massing, brick walls, and the locations of the window bays and doors. The windows on the southeast and southwest elevations are replacements, and the opening now covered by a stucco panel originally had a window. The doors appear to be replacements except for the northeast end door on the northwest elevation.

Loading Dock and Kennel Walkway

The loading dock between the administration and service buildings has a concrete floor which is raised at the loading dock side and at grade on the kennel area side (Figure 21). The canopy over the loading dock is corrugated metal carried on steel beams. Extending southwest from the loading dock is a long concrete sidewalk with two crosswalks placed equidistant along its length and a partial crosswalk at the southwest end. The sidewalks are covered with corrugated metal canopies carried on steel beams (Figure 22). Both the loading dock and kennel walkway were built in 1963.

Integrity: Although the walkways appear to be intact, they once led to five distinctive cross-shaped kennel buildings which were demolished between 1998 and 2002 and replaced with steel barns on the east side. The loss of these kennel buildings has severely impacted the integrity of the walkways and of the site overall.

MARYLAND HISTORICAL TRUST
NR-ELIBILITY REVIEW FORM

Continuation Sheet No. 5

MIHP No: _____

Ancillary Buildings and Structures

Steel Equipment Building/Barns

On the BRF site are three steel buildings, one to the east of the Service Building (Figure 23), and two on the east side of the kennel area (Figure 24). They were erected between 1998 and 2005, following the removal of the kennel buildings. All three are rectangular, one-story, gable-roofed buildings covered in vertical metal siding with standing seam metal roofs. The building to the east of the service building has sliding garage doors on the southwest gabled end. The northwest and southeast elevations of the center building, which is the largest, have single-leaf entry doors sheltered under cantilevered shed roofs and a rollup garage door on the southeast elevation. There are also windows on the northwest, southeast, and southwest elevations. The third building has a rollup garage door on the southeast elevation and a single window on the northeast elevation. Both these buildings are connected to the kennel walkways on their northwest elevations.

Utility Structures

At the southeast corner of the BRF site is a one-story, cross-shaped, flat roof building constructed of concrete masonry units painted white (Figure 25). On the northwest elevation are two wood doors with glass panels in their upper halves, under a shed roof extension. There is a single-leaf flat panel wood door on the southeast elevation, and an opening on the northeast elevation that is covered with vertical wood siding. Off the southwest corner of this building are two low round concrete tanks. At the northwest corner of the BRF site is a complex of three utility structures enclosed within a chain link fence (Figure 26). All three are one-story, rectangular structures that appear to be sided with metal. Each has multiple door openings with flat panel metal doors.

Miscellaneous Structures

Scattered around the BRF site are multiple structures, including two wood sheds at the northeast corner, east of the Service Building; three-sided shed-roofed structures for sheltering animal feed in the pasture areas; several shipping containers; and a steel skeleton light tower in the center of the kennel area (Figures 27-28).

Module I and Module II Complex

Site

The Module I and Module II complex is situated on relatively level ground on the north side of the campus, west and south of the BRF site and northeast of the Animal Research Facility. It is centered on the Module I/Module II complex, constructed in phases from 1983 to 1996. The main road through the campus, Pasture Road, enters the Mod I/II site from the northeast. While Pasture Road turns to the northwest (Figure 29), a boulevard drive continues southwest, ending in a circular drive with several parking spaces and a dropoff area at the main entrance to Mod I. Meanwhile, Pasture Road turns again to the southwest and continues through the Mod I/Mod II site between the buildings and a large rectangular parking area on the west side (Figure 30). There is another parking area within the ell formed by Mod I and Mod II, and a tear-drop shaped parking lot off the west corner of Mod II. Concrete sidewalks are located at the northeast entrance to Mod I from the circle drive, from the main parking lot across Pasture Road to Mod I and Mod II, and around the tear-drop shaped parking lot. An asphalt walkway is located along the east side of the complex between Mod I/II and the stream valley. At the northeast end of Mod I, northwest of the circle drive, is a patio seating area, consisting of two levels of stone pavers and low semi-circular walls with stone piers (Figure 31). It has picnic benches and tables and is surrounded by ornamental plantings. Ornamental plantings are also present in the center of the boulevard and within the circle drive and in the middle of the tear-drop shaped parking lot, as well as scattered specimen trees and shrubs. Within a lawn panel at the driveway entrance to Mod II is a triangular sculpture balanced on its point, with animal-head cutouts on its faces.

Module I and Module II

Module I and Module II were constructed separately, but were designed around the same time, are connected, and aesthetically and functionally read as one building (Figures 32-38). Both buildings were designed by Max O. Urbahn Associates, Inc. (in association with LBC&W of Falls Church, Virginia for Module I) for the General Services Administration, although constructions drawings for Module II were issued in 1994 due to a delay in funding for the second phase (see history section,

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below).³ Max O. Urbahn Associates was a nationally known firm that had completed a number of federal government projects, including several GSA contracts. In terms of massing, Mod I is a large, generally rectangular building, while Mod II is also rectangular, but smaller and acts as a wing to Mod I. Both are multi-story buildings with multiple levels, towers, and projecting and receding elevations that read as a series of irregular, interlocking volumes. The various roof levels are flat, with visible HVAC equipment on the roofs. The buildings are constructed of red brick. The limited window openings generally present as narrow, horizontal bands of bronzed aluminum and dark glass extending across long walls and occasionally wrapping around building corners. Bronzed aluminum and dark glass curtain walls with curved tops mark the upper levels above the main entries of Mod I (northeast elevation) and Mod II (west corner). On the northeast elevation of Mod I (Figure 32), the first floor from the entry west is recessed under the second level, with the overhang supported on regular round columns. Behind the column line is a white fascia band. The main entry of Mod II has a one-story bronzed aluminum canopy extending from the entrance doors. Some upper levels of the building feature wide bands of white metal inset in the blank walls and wrapping in curves to the adjacent elevations. On the northwest elevation of Mod I (Figure 35), a wide band of this material slopes in from the top of the first-floor wall steeply back and curves in to stop at the second floor window sills. The southwest elevation of Mod I and the and the northeast elevation of Mod II have recessed open garage bays (Figure 34). Mod I connects to Mod II via a one-story section.

Animal Research Facility and Quarantine Area

The Animal Research Facility was constructed in the late 1990s. It is located on the western side of the campus, southwest of the BRF and Mod I/II complexes (Figures 39-40). The main road through the campus, Pasture Road, splits into three drives at the Animal Research Facility: one that leads straight through the center of the facility, and two that form a loop road around most of the buildings in the facility. Pasture A is north of the loop road, situated on high ground between the three gravel pit lakes, Pasture B is to the south of the loop, and Pasture C is southeast of the loop. Within the loop are twelve buildings of various sizes. Most are rectangular, one-story, front gabled roof buildings constructed of concrete block with standing seam metal roofs and aligned along an east-west axis. These contain animal research facilities. The aquaculture laboratory building at the north end of the loop has a flat roof, while a cage-washing facility at the south end of the loop has a cruciform footprint. Three similar buildings are set outside the loop on its southwest side, and a drive leads from this end of the loop south to two cul-de-sacs at the south end near Odell Road. On the north side of the loop is a smaller complex of two single-story, rectangular, flat-roofed support buildings and another gable-roofed building adjacent to Pasture A. The buildings are connected by short drives and small parking areas. Within the pastures are a number of concrete pads and three-sided shed-roofed structures for animal feeding. An asphalt drive leading through Pasture C connects Pasture Drive with a secondary entry gate at Odell Road. At the south end of Pasture C just inside the gate at Odell Road is an animal quarantine facility, consisting of a rectangular, one-story, gable roof building of similar construction to the other buildings in the Animal Research Facility.

FDA EAST PARCEL

The East Parcel is a 52-acre tract of land owned by the FDA. It is bounded roughly by Odell Road on the west, Springfield Road on the south, and the rear lot lines of the residential subdivision to the east and privately owned parcels on the north between the East Parcel and Muirkirk Road (Figure 41). Of the East Parcel, the Maryland Army National Guard occupies and uses a 23.45-acre tract, the South Laurel Water Pumping Station occupies a 4-acre tract, and the remaining 24.55-acre area is undeveloped (Figure 42). With the exception of the areas immediately surrounding the Maryland Army National Guard facility and the South Laurel Water Pumping Station, the East Parcel is covered with dense woodland.

The Maryland Army National Guard (PVT Henry Costin Armory) facility is located at the north end of the East Parcel, directly east of the Beltsville Research Facility (Figures 43-44). It is accessed by a two driveway entrances from Odell Road. The facility was constructed ca. 1993 (architect unknown) and consists of two buildings, one large ell-shaped building in the south center area of the facility, and a smaller rectangular building to its east. Both are one story tall and constructed of brick and stucco walls. They have front gabled roofs covered by standing-seam sheet metal. The remainder of the site is dominated by asphalt surface parking lots and is surrounded by chain link fence.

³ Max O. Urbahn Associates, Inc./LBC&W, Architects, Engineers, Planners, "Food and Drug Administration Animal Testing and Laboratory Facility," Drawing Set prepared for Department of Health and Human Services Office of Facilities Engineering, 1983, scanned set provided by US Food and Drug Administration.

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The South Laurel Water Pumping Station is directly south of the Maryland Army National Guard Facility, although the two are separated by trees and chain link fencing. The station, which was constructed ca. 1981 (architect unknown), has a large circular metal water tank. To the east of the tank is a small, one-story, rectangular building with a flat roof. The station is accessed by an asphalt drive entering from Odell Road and curving east and south to form a parking area between the tank and support building.

SUMMARY TABLE OF RESOURCES

Area	Resource Name	Date of Construction
Beltsville Research Facility	Pharmacological Animal Laboratory (Main and Service Buildings connected by Loading Dock)	1963
	Kennel Walkway	1963
	Steel Barn 1	Ca. 1998-2005
	Steel Barn 2	Ca. 1998-2005
	Steel Barn 3	Ca. 1998-2005
	CMU Utility Building	Ca. 1970s
	Utility Structure Complex (3 buildings)	Ca. 1994-1998
	Two wood sheds	Ca. 1998-2002
	Animal feed sheds (Pasture D)	1994-1998
	Skeleton light tower	Unknown
Module I/Module II Complex	Module I	1983-1991
	Module II	1994-1998
Animal Research Facility	B1 (Animal Research Support)	1994-1998
	B2 (Animal Holding Area)	1994-1998
	B3 (Animal Holding Area)	1994-1998
	B4 (Animal Holding Area)	1994-1998
	C1 (Animal Research Support)	1994-1998
	C2 (Animal Holding Area)	1994-1998
	C3 (Animal Holding Area)	1994-1998
	C4 (Animal Holding Area)	1994-1998
	C5 (Animal Holding Area)	1994-1998
	C6 (Animal Holding Area)	1994-1998
	D1 (Equipment Building)	1994-1998
	D2 (Storage Building)	1994-1998
	E1 (Animal Holding Area)	1994-1998
	F1 (Animal Quarantine)	1994-1998
	H (Aquaculture Laboratory)	1994-1998
	J (Equipment Building)	1994-1998
	L (Hay Storage)	1994-1998
	M (Loafing Building)	1994-1998
	Storage Building (Pasture A)	Ca. 1998-2005
	Animal feed sheds (Pastures A-C)	1994-1998
Maryland Army National Guard (PVT Henry Costin Armory)	Building 1	Ca. 1993
	Building 2	Ca. 1993
South Laurel Water Pumping Station	Water Tank	Ca. 1981
	Support Building	Ca. 1981

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ELIGIBILITY DETERMINATION

Methodology

The records of the US Food and Drug Administration are held at the National Archives facility at Suitland, which was closed to researchers during the period this DOE was prepared due to the COVID-19 pandemic. Interviews were conducted with FDA Historians John P. Swann and Vanessa Burrows, who also provided a copy of the finding aid for the FDA collection at the National Archives and access to online editions of two publications, the *FDA Veterinarian* and the *FDA Consumer*. GSA provided scanned records related to the acquisition and planned dispositions of the property. This material was augmented by histories published on the FDA's website, previous studies of the site, Congressional records, newspapers, historic maps and aerial photographs, and other documents. Research also included review of files and maps within the digital repositories of the Maryland Historical Trust (MHT) and the National Register of Historic Places (NRHP) and those of the Library of Congress, National Archives and Records Administration, Maryland State Archives, and US Geological Survey. Research was also shared between the preparers of this DOE and of the Phase I Archaeological Resources Survey, prepared concurrently. Based on these materials and the interviews with the FDA historians, we have no reason to believe that subsequent research in the National Archives would alter this eligibility determination.

HISTORY OF THE PROPERTY

The FDA Muirkirk Road Campus (MRC) lies in the northern area of Prince George's County, Maryland. People have been living in this region for at least 10,000 to 13,000 years. The range of dialects present within the region by the seventeenth century (Algonquian, Siouan, and Iroquoian) speak to the number of tribes and nations that made this place their home, and different groups practiced varying cultural patterns encompassing cultivation of crops, hunting of large and small game, and harvesting the natural resources of the region. While some groups lived in permanent or semi-permanent settlements, others traveled to different locations according to resources available in different seasons.⁴ Archaeologists, who categorize groups of people according to material evidence, found artifacts dating from the Middle Archaic (6500 to 300 BC) to Early Woodland (3000 to 1000 BC) periods on the East Parcel of the MRC, primarily projectile points and tools suggesting that the site was used as a hunting camp or resource processing station. By the time the first European explorers reached the region, the major groups living in the region included the Powhatan, largely south of Maryland and the District of Columbia, and the Piscataway, living north of the Potomac River.⁵

Euroamerican people began settling in this part of the county in the seventeenth century, and Prince George's County was established in 1696. During this period the primary land use was agricultural, chiefly for tobacco cultivation which typically was farmed on large plantations using the labor of enslaved Black people. The current area of the MRC was part of a land tract on the Patuxent River originally patented by members of the Snowden family in the seventeenth century. Due to the presence of rich iron deposits, a lucrative iron mining and smelting industry was also established in Maryland in the 1700s, beginning with the Patuxent Iron Works founded in 1726 by the Snowden family. The iron works also used enslaved labor.⁶

The area further developed as an agricultural and industrial landscape in the early nineteenth century. While tobacco farming remained important, its intensive use of cropland depleted soil nutrients, leading some farmers to diversify into new crops. In addition, farm sizes tended to diminish during the nineteenth century, while the number of farms increased. Industry also diversified, with the first cotton mills established at Laurel in the 1820s. Water was the primary source of power for industry. The region's road network also took shape during the eighteenth and nineteenth centuries to support movement of crops and industrial products to trading centers.⁷

⁴ National Park Service, "Pre-Contact," Captain John Smith National Historic Trail, <https://www.nps.gov/cajo/learn/historyculture/pre-contact.htm>, accessed January 11, 2021.

⁵ Stantec Consulting Services, "US Food and Drug Administration Muirkirk Road Campus Master Plan, Phase I Archaeological Investigations, Prince George's County, Maryland," Draft Report, January 27, 2021, 26, 87.

⁶ Maryland-National Capital Park and Planning Commission, *Illustrated Inventory of Historic Sites and Districts, Prince George's County, Maryland* (Upper Marlboro, Maryland: The Maryland-National Capital Park and Planning Commission, 2011), 4-11.

⁷ Maryland-National Capital Park and Planning Commission, *Illustrated Inventory of Historic Sites and Districts, Prince George's County, Maryland* (Upper Marlboro, Maryland: The Maryland-National Capital Park and Planning Commission, 2011), 4-11.

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In 1847 members of the Ellicott family established the Muirkirk Ironworks, several miles northwest of the MRC (Figure 46). In 1853 it was purchased by the Coffin family, Quakers who operated it until 1920. The Muirkirk Ironworks initially used the labor of enslaved Black people for extraction and processing of the pig iron, which was an important source of military ordnance during the Civil War. Iron was sourced from around the region, from as far as southwest Baltimore County, about thirty miles away. There are three extant iron pits and some topographic disturbance in the central area of the MRC site that indicates iron was extracted from the property in the nineteenth and/or early twentieth centuries. The 1892 Laurel, Maryland Topographic map labels iron ore within the MRC boundaries (Figure 45). The site of the Muirkirk Ironworks/Muirkirk Furnace has been redeveloped with modern industrial buildings and no extant above-ground resources remain.⁸

Following the emancipation of Black people in Maryland at the end of the Civil War in 1865, a number of free Blacks continued to work at the Muirkirk Ironworks. In 1868 six Black men built a log chapel, later known as Queen's Chapel, on a small plot of land purchased from a White farmer which included a graveyard already being used by the Black community. Twenty years later, an approximately 25-acre plot of land adjoining Queen's Chapel was subdivided into twelve lots that were purchased by local Black families employed at the Muirkirk furnace. In addition to their houses, members of the community also built Rebecca Lodge #6 of the Benevolent Sons and Daughters of Abraham, known as Abraham Hall.⁹ This community hall was the nucleus of what became known as Rossville, a small rural Black community that has been documented as representing "an emerging African-American community in the late nineteenth century...during the transition from slavery to freedom in the post-Civil War Years. Rossville served as a cultural and social center for the African-American community. The establishment of a church, school, and benevolent society reflected a sense of unity and self-sufficiency within the small community."¹⁰ Rossville was located north of Muirkirk Road west of Ellington Drive, northwest of the MRC. According to the 2003 Maryland Historical Trust Determination of Eligibility Form, Rossville was surveyed in 1983 and 1987. The district was also documented in the 2007 Rossville Community Survey and in the 2012 context study "African American Historic and Cultural Resources in Prince George's County." None of these surveys cite any Rossville-related sites within the MRC boundaries. The closest properties were the Muirkirk Rosenwald School (1922) on the south side of Muirkirk Road west of Ellington Drive, and the Edward Gross house, southwest of the intersection of Ellington Drive and Odell Road.¹¹

The GM Hopkins Map of 1878 is one of the earliest depictions of the MRC (Figures 46 and 47).¹² Both Muirkirk Road and Odell Road are present at this time. Three houses are depicted on the property: the J. Alonzo Barnes house, on the east side of Odell Road in the current East Parcel, and the houses of Lester D. Moore and Mrs. Isaac Snowden, northwest of the intersection of Odell and Springfield Roads. According to the 1880 census, both Moore and Snowden were farmers (Barnes was not present in this census). Mrs. Snowden's husband, Isaac, who had died prior to 1878, had been a manager at the Muirkirk Ironworks. The 1981 Phase I archaeological survey investigated the Barnes house site and found evidence of a trace road and two structures, approximately 30 feet apart, on a knoll surrounded by woods. The Phase I study also searched for the Lester D. Moore and Mrs. Isaac Snowden properties, which would be in the approximate area of today's Pasture D, but found no evidence.¹³ By 1914 the only house present on future MRC land was the J. Alonzo Barnes house. Following the 1981 archaeological survey, this site was determined ineligible for listing in the NRHP and was likely destroyed during construction of the Maryland Army National Guard facility.¹⁴

⁸ Maryland Historical Trust, Muirkirk Furnace Site File (PG:62-8), <https://mht.maryland.gov/secure/Medusa/PDF/PrinceGeorges/PG:62-8.pdf>, accessed January 11, 2021.

⁹ Susan G. Pearl, "Rossville, Muirkirk," Maryland Historical Trust State Historic Sites Inventory Form (PG:62-63), August 1986-September 1987. Abraham Hall is listed in the National Register of Historic Places under the Maryland Multiple Property Submission for "African American Historic Resources in Prince George's County, Maryland" (Listed 2005).

¹⁰ EHT Traceries, "Rossville Community Survey," November 2007, 2.

¹¹ Maryland-National Capital Park and Planning Commission, *African-American Historic and Cultural Resources in Prince George's County, Maryland* (Upper Marlboro, Maryland: The Maryland-National Capital Park and Planning Commission, 2012), 11, 53-54; Max O. Urbahn Associates, L.B.C.&W., Inc., and A. T. Kearney, Inc., "Final Environmental Impact Statement: Food and Drug Administration Headquarters Laboratory Facilities, Beltsville, Maryland," July 1981, viii.

¹² G. M. Hopkins, "Atlas of Fifteen Miles around Washington including the County of Montgomery, Maryland" (Philadelphia, PA: G. M. Hopkins, 1879), Plate 45: Vansville District No. 1.

¹³ Mid-Atlantic Archaeological Research, Inc., "Archaeological Investigations Phase I: Proposed Headquarters Laboratory Facilities, Food and Drug Administration, Beltsville, Maryland," March 1981, II-4.

¹⁴ Mid-Atlantic Archaeological Research, Inc., "Archaeological Investigations Phase I: Proposed Headquarters Laboratory Facilities, Food and Drug Administration, Beltsville, Maryland," March 1981, I-11; Stantec Consulting Services, "US Food and Drug Administration

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In the late nineteenth century the rural areas of Maryland and Virginia outside the boundary of Washington, DC, began to develop as early residential suburbs. By the early twentieth century the federal government was also purchasing large tracts of land for the development of institutional campuses outside of the federal city. Among these was the Department of Agriculture, which purchased over 10,000 acres of land for its Beltsville Agricultural Research Center (BARC) between 1910 and 1940. This included the MRC, which was purchased in the 1930s. The Maryland Historical Trust's 2017 Addendum to the BARC's historic context notes that at the BARC "historically, buildings were constructed in groupings associated with individual bureaus/divisions of the USDA or other federal agencies." The largest of the BARC's farm clusters was the Central Farm, "historically used by the Bureaus of Dairy Industry and Animal Industry and their successor organizations." The boundary for the Central Farm established in that context lies to the south of the MRC (Figure 48).¹⁵

An aerial photograph in 1938 depicts the MRC (Figure 49).¹⁶ The main portion of the campus between Muirkirk, Odell, and Ellington Roads was largely wooded, with some cleared areas just southwest of the intersection of Muirkirk and Odell Roads, and along the northern boundary of the parcel near Muirkirk and Ellington Roads. The East Parcel was mostly cleared, indicating it was still or had recently been used as farmland (the aerial is not clear enough to identify any buildings). Just to the south of the MRC the aerial map is labeled "U. S. Experimental Farm," a reference to the BARC. The Patuxent Wildlife Research Center, east of the MRC, was established in 1936. The presence of new government installations in outlying areas of Prince George's County drew employees and new residents to these areas.¹⁷

The MRC remained part of the BARC until the late 1950s, when it was first identified as the location for a new facility of the U.S. Food and Drug Administration (FDA). The FDA traces its origins to the U.S. Department of Agriculture's Division of Chemistry, founded in 1862 for soil analysis. In the 1880s the Division, under chief chemist Harvey Washington Wiley, began to investigate adulterated and misbranded food and drug products. The Division's analyses, and Wiley's lobbying, led to the passage of the Pure Food and Drugs Act in 1906, which gave the federal government regulatory power over the interstate transport and marketing of food and drugs. The Division was renamed the Bureau of Chemistry in 1901 and its field offices reorganized into three districts overseeing sixteen field laboratories, or stations. The Bureau of Chemistry was renamed the United States Food, Drug and Insecticide Administration in 1927, shortened in 1930 to the U.S. Food and Drug Administration. FDA's scope and power were considerably expanded in 1938 with the passage of the Federal Food, Drug, and Cosmetic Act (FFDCA), which required drug manufacturers, including those producing drugs for animals, to prove the safety of their products before releasing them into the marketplace. It also expanded the FDA's regulatory power over foods, cosmetics, and therapeutic devices and authorized inspection of production facilities. Reflecting its expanded role, the FDA was transferred from the USDA to a newly created entity, the Federal Security Agency. This was renamed the Department of Health, Education, and Welfare (HEW) in 1953 and the Department of Health and Human Services (HHS) in 1979.¹⁸ As FDA Commissioner George P. Larrick testified to the US Congress in 1963, the scope of FDA's oversight of food and drugs had radically altered and expanded in the decades following the end of World War II. Pointing to the expansion of the US economy and production, as well as technological changes in the food and drug industry, Larrick noted that 66% of the foods available in 1963 had not existed just ten years earlier, and 45% of the drugs on the market were new since 1958. Population numbers were increasing rapidly, millions of people were moving from farms and rural communities to urban centers, increasing their dependence on "readymade" foods, and the proportion of older people, who tended to need more drugs, special diets, and therapeutic devices, was also increasing. In turn, the FDA had to hire more employees to handle its

Muirkirk Road Campus Master Plan, Phase I Archaeological Investigations, Prince George's County, Maryland," Draft Report, January 5, 2021, 34.

¹⁵ Lorin Farris (AECOM), "Addendum to Maryland Historical Trust Maryland Inventory of Historic Properties Form (PG:62-14)," March 17, 2017, 1. <https://mht.maryland.gov/secure/Medusa/PDF/PrinceGeorges/PG:62-14.pdf>, accessed January 11, 2021.

¹⁶ U. S. Agriculture Stabilization and Conservation Services, "Prince George's County Index 1938," (aerial photograph), <https://jscholarship.library.jhu.edu/handle/1774.2/36436>, accessed January 11, 2021.

¹⁷ Maryland-National Capital Park and Planning Commission, *Illustrated Inventory of Historic Sites and Districts, Prince George's County, Maryland* (Upper Marlboro, Maryland: The Maryland-National Capital Park and Planning Commission, 2011), 4-11.

¹⁸ "A Century of Ensuring Safe Foods and Cosmetics," <https://www.fda.gov/media/109481/download>; "History of FDA's Centers and Offices," <https://www.fda.gov/about-fda/history-fdas-internal-organization/history-fdas-centers-and-offices>; "History of CVM," <https://www.fda.gov/about-fda/center-veterinary-medicine/history-cvm>; "History of FDA's Internal Organization," <https://www.fda.gov/about-fda/history-fdas-fight-consumer-protection-and-public-health/history-fdas-internal-organization>; "CVM Milestones," <https://www.fda.gov/media/116951/download>, accessed January 11, 2021.

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increasing workload. Many of these employees were scattered in various locations around the Washington, DC area, including a number that were housed in outdated facilities on the USDA's Beltsville Agricultural Research Center campus.¹⁹

In 1958 the FDA first "expressed to the Secretary of the HEW an urgent need of 15,000 sf of laboratory space and stated that programs are seriously being handicapped through inefficient working conditions."²⁰ The FDA was also coming under pressure from animal welfare activists to provide better living conditions for its research animals. Journalist Ann Cottrell Free published an article in the *Washington Sunday Star* on November 15, 1959, that discussed animal welfare in the science industry and cited the conditions of the FDA's beagles, housed in 30" x 36" cages in the sub-basement of the South Agricultural Building on the BARC. She noted that plans for a new FDA building then in development did not include space for indoor or outdoor runs for the dogs. The piece resulted in widespread publicity for the issue and members of the Animal Welfare Institute met with FDA officials to negotiate a separate facility where more space would be available to provide exercise and daylight for the animals. Congress appropriated \$100,000 for the new facility, planned for a rural area where land was available and less expensive, and where the noise associated with housing hundreds of dogs would not disturb adjoining neighborhoods.²¹

In March 1961 the USDA declared 209.5 acres of unimproved land on the northern end of the BARC as excess real property (a later survey determined the exact acreage as 194.556 acres).²² A 1957 aerial photograph shows that at this time the entire MRC parcel was heavily wooded, with the open spaces at the northeast corner of the property filling in with successional growth, aside from a few trace roads (Figure 50).²³ Although agricultural fields were still visible on portions of the East Parcel, it was also filling in with successional growth, particularly on the south side. Given the parcel's proximity to other FDA facilities at the BARC, it seemed a good potential location for a research facility. In July 1961 the establishment of the Special Pharmacological Animal Laboratory (SPAL) was approved. This facility (now known as the Beltsville Research Facility (BRF)) would deal with testing of food and color additives, pesticides, and drug potency, and a major element of the facility was providing more ample kennels and exercise areas for research animals, primarily dogs but also some pigs. FDA also considered the MRC property to be a potential site for a new headquarters, as the SPAL would only occupy a small area at the northeast corner.²⁴

The FDA's need for the SPAL was so acute that design and construction began before the USDA transferred the property or FDA could develop a master plan. For the complex's design, the General Services Administration (GSA) commissioned the George M. Ewing Company. This firm had been founded in Philadelphia, Pennsylvania, in 1938 by George M. Ewing (1888-1989), a graduate of the Drexel Institute (1912) who had worked for the firm of Karcher and Smith from 1916 to 1938. Ewing began his career with suburban residential work and gradually progressed to large industrial and public buildings, adding other architecture and engineering partners to the firm in 1943. The bulk of the firm's work was in Pennsylvania, specifically the Philadelphia metropolitan area, where it designed residences, department stores, offices, factories, and manufacturing plants. By 1962 it employed over 175 people and had added (in 1960) an office in Washington, DC. The firm began working on major federal government contracts in the 1950s, one of the largest and most prominent being the rehabilitation and enlargement of Bancroft Hall at the US Naval Academy in Annapolis, Maryland (designed beginning 1956, construction 1959-1968). Around the same time that George M. Ewing Company was designing the SPAL, it was also awarded a commission by the GSA/Department of Health, Education, and Welfare to design a three-building complex for St. Elizabeth's Hospital in Washington, DC, and was working on another significant project, the Rohm and Haas Headquarters in Philadelphia, in association with Pietro Belluschi (completed 1964, listed in the National Register of Historic Places, 2007). Other important

¹⁹ U.S. Congress, "Senate Committee on Appropriations Hearings, 88th Congress, 1st Session, 1963. Health, Education, and Welfare Appropriations for 1964, Part 1, 2," (Washington, DC: US Government Printing Office, March 26, 1963).

²⁰ U. S. Congress, "Food and Drug Administration Procedures for the Selection of Laboratory Sites: Hearing before a Subcommittee on Government Operations, 90th Congress, June 28, 1967," (Washington, DC: US Government Printing Office, 1967), 7.

²¹ Ann Cottrell Free, "Proper Care for Science's Animals," *The Sunday Star* (Washington, DC), November 15, 1959, B-3; George A. Ford, "Let's Talk Dogs," *Hartford Courant* (Hartford, Connecticut), April 24, 1960, 12C; Dick West, "The Lighter Side," *United Press International*, May 23, 1961. In 1963 Free was awarded the Albert Schweitzer Medal of the Animal Welfare Institute for her reporting on animal welfare in government research facilities.

²² L. E. Nunally, Chief, Real Property Division, General Services Administration, Letter to F. R. Mangham, Director, Office of Plant and Operations, US Department of Agriculture, dated March 20, 1964, copy provided by General Services Administration.

²³ HistoricAerials.com, accessed January 11, 2021.

²⁴ "Humane Group Assails U. S. Housing of Dogs," *Washington Post*, May 6, 1961, C1; "Animal Research Site Approved," *Washington Post*, July 18, 1961, B1; U.S. Congress, "Senate Committee on Appropriations Hearings, 88th Congress, 1st Session, 1963. Health, Education, and Welfare Appropriations for 1964, Part 1, 2" (Washington, DC: US Government Printing Office, March 26, 1963).

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works by George M. Ewing Company included the Pennsylvania Governor's Mansion, Harrisburg, Pennsylvania (1964-1968); Veterans Stadium, Philadelphia, Pennsylvania, in association with Hugh Stubbins & Associates and Stonorov and Haws (1967-1971, demolished 2004); the South Jersey Gas Corporate Headquarters, Folsom, New Jersey (1971); Admiral Chester Nimitz Library, in association with John Carl Warnecke and Associates (1973) and Micheleson-Chauvenet Hall (1977), both at the US Naval Academy, Annapolis, Maryland. George M. Ewing's son, Alexander, initially practiced in his father's firm and left in 1961 to form what would become EwingCole; the latter firm eventually absorbed portions of the George M. Ewing Company.²⁵

George M. Ewing Company prepared drawings in the summer of 1962. The facility's design was included in the *Architectural Forum's* list of current work in January 1963, where the brief project summary noted that "Probably there is nothing in a designer's training which prepares him for the moment when he is picked to design a kennel for 576 government dogs. Nevertheless, the George M. Ewing Co. of Philadelphia solved the problem with a campus of six cross-shaped dormitories connected by covered runs and a separate administration and laboratory building." A rendering of the facility was also included (Figure 51).²⁶ The design consisted of a small one-story building complex with an administration/laboratory building to accommodate 35 employees connected to a smaller service building by a covered loading dock area. Extending to the south and west, the greater portion of the facility was occupied by six cross-shaped kennel buildings connected to each other and the main building by covered walkways (only five kennels were built). Each individual kennel run was approximately 4'x 16' feet including both indoor and outdoor areas. A straight drive cutting across the northeast corner of the site connected the facility to Odell and Muirkirk Roads. Only the immediate rectangular area surrounding the SPAL facility was cleared. This location was at the highest point on the site and was a relatively flat area suitable for building. The facility was oriented 45 degrees off the north/south axis, a design element that would be carried forward in future planning for the site. Bids were opened and the construction contract awarded in September 1962 to John Volpe Construction Company for \$1.5 million.²⁷ The facility was completed in 1963 (Figure 52). Also by this time, the East Parcel had continued to fill in with successional growth, with only a few agricultural fields still visible on the east side of the site (Figure 53).

The official transfer of the 194-acre Beltsville property from the USDA to the FDA was finalized on April 10, 1964. FDA immediately began planning for the future development of the site by commissioning a site development plan (Figure 54). This plan, approved by the National Capital Planning Commission (NCPC) in 1966, accommodated three main activities: the SPAL, already present on the site, with its research laboratory, kennels for animals, and breeding facility; the Veterinary Medicine Research Farm for the Bureau of Veterinary Medicine (BVM, now Center for Veterinary Medicine (CVM)), including pastures and pens for maintaining the animals used in the research facility; and a Research Laboratory Complex for the Bureau of Science and BVM. Initial development of the site was expected to be completed in 1972, and the plan accommodated an eventual campus population of up to 1,800 employees.²⁸

In planning the campus, a number of external factors were incorporated. The MRC was located on the northern boundary of one of the NCPC's "wedges": open spaces maintained between the development corridors radiating from Washington, DC.²⁹ As such, it was expected to remain relatively rural in character, so vegetative buffers were maintained around the site and building heights were kept low to limit their visibility outside the campus. It was also expected that an outer beltway "circumferential highway" would cut across the northeast corner of the site, which would have required rerouting Odell Road and building a bridge to carry Muirkirk Road over the highway (the highway was not constructed).³⁰

²⁵ Edgar Williams, "Fifty Years an Architect, the Equable George M. Ewing Advises: Never Make a Thunderstorm out of a Small Shower," *Philadelphia Inquirer Magazine*, September 23, 1962, 10; Emily T. Cooperman and Sandra L. Tatman, "George Mallison Ewing," *Philadelphia Architects and Buildings*, https://www.philadelphiabuildings.org/pab/app/ar_display.cfm/25851, accessed January 11, 2021; American Institute of Architects, 1970 *American Architects Directory* (New York: R. R. Bowker, LLC, 1970), 263; David W. Moore, Jr., Justin B. Edgington, and Emily T. Payne, "A Guide to Architecture and Engineering Firms of the Cold War Era," US Department of Defense Legacy Resource Management Program, March 2010, 115-116; Contract for Design of U.S. Hospital Let., *Baltimore Sun*, May 8, 1962, 7.
²⁶ "Projects," *Architectural Forum*, January 1963, 29. The project was not mentioned in the American Institute of Architects' *Architectural Record* or in *Progressive Architecture*.

²⁷ E. G. Huddleston, Jr., Chief, Property Management Branch, Letter to Elmer Smith, Office of Financial Management, May 10, 1963, copy provided by General Services Administration. "Volpe Co. Will Build FDA Lab at Beltsville," *Washington Post*, September 30, 1962, A12.

²⁸ Plavnick, Robert L., *Site Development Plan: FDA Research Facility, Beltsville, Maryland* (Washington, DC, 1966), 7-8.

²⁹ Plavnick, Robert L., *Site Development Plan: FDA Research Facility, Beltsville, Maryland* (Washington, DC, 1966), 7; Leo A. Daly, Tetra Tech, Inc., "Environmental Assessment of the Center for Veterinary Medicine," August 14, 1995, 3-2.

³⁰ Plavnick, Robert L., *Site Development Plan: FDA Research Facility, Beltsville, Maryland* (Washington, DC, 1966), 16- 30.

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Internal factors also impacted the site plan. Three natural stream valleys with small ponds ran through the center of the property, which was steeply sloped, and three mine pits filled with water were located at the western end of the site. To accommodate these elements, the relatively level, well-drained areas at the existing SPAL facility and another area to the southwest of it were identified as building sites. A three-building laboratory complex around a central courtyard was planned for the latter site. The remainder of the site would be used as pasture areas surrounded by woods, with small buildings for housing animals, feed, and other materials. To the extent possible, wooded areas were retained to provide shade and ground-water retention and maintain the pastoral character of the property. The building areas would be encircled by a loop road with entrances from Odell Road at the existing SPAL entrance and another across from Springfield Road, and a secondary entrance from Muirkirk Road, while other internal roads would provide access to pasture areas.³¹

Although the design of the proposed laboratory buildings was already in progress when the Site Development Plan was approved, further construction on the FDA's new campus stalled in subsequent years due to budgetary restraints and a presidential moratorium on federal construction.³² By the early 1970s FDA was considering a change in its plans for the site, seeing it as a good location to consolidate its office and laboratory functions, essentially a new headquarters. With further development delayed on the MRC, FDA was still operating in at least ten separate locations in the DC metro area, many of which were obsolete. However, NCPC discouraged dense development of a site it still considered part of its "green wedge" and asked FDA to consider alternate sites.³³ While the FDA was still considering its options and working on a facilities plan, the General Services Administration surveyed the MRC and recommended that 178 of the 194 acres be determined as excess property and sold for private development.

GSA would periodically renew this effort to declare the majority of the MRC parcel as excess property for nearly 15 years, citing the FDA's inability to fund further construction of the property.³⁴ Each time, the FDA strongly objected. In 1976 the agency completed its long-range facilities plan. It was still seeking a site that would accommodate a consolidated headquarters and laboratory site. It estimated this would need a minimum of 200 acres, and preferably 300. While the MRC was only 194 acres, the USDA had recently (1975) declared 59 acres of land adjacent to the MRC (the East Parcel) as excess property. FDA applied to acquire this property, noting that this would make the Beltsville site adequate for a headquarters site, although it continued to survey other USDA parcels in the hopes of finding a site with better highway access.³⁵

The NCPC was also dubious about the suitability of the MRC as a headquarters for FDA, citing conflicting land uses with the nearby USDA Beltsville Agricultural Research Facility, the Goddard Space Flight Center, and the Patuxent Wildlife Research Center. NCPC was also concerned that more intensive development of the site was incompatible with its designation as a green wedge area, as well as bringing more traffic to the area. By this time, FDA had transferred a 25-acre portion of the northeast corner of the site, which was still designated for an outer beltway.³⁶

Despite these obstacles, FDA continued to make plans to build new facilities on the campus. The East Parcel was transferred to the Department of Health, Education, and Welfare (FDA's parent agency) in 1979, and the FDA prepared a revised and updated master plan in 1980 (Figure 55). This plan envisioned the construction of six lab and office modules, including placement of offices on the southern portion of the East Parcel, clearing acres for pasturage, and retaining the balance of the MRC as undeveloped woodlands. This plan was approved in May 1980.³⁷ The construction of Module I, the first of two

³¹ Plavnick, Robert L., *Site Development Plan: FDA Research Facility, Beltsville, Maryland* (Washington, DC, 1966), 16- 30.

³² Charles R. Lasham, Director, Division of General Services, FDA. Memorandum to Dale S. Thompson, Director, Division of General Services, April 28, 1967, copy provided by General Services Administration.

³³ "Justification Statement: FDA Retention of Land at Beltsville, MD," October 14, 1971; Rodney H. Brady, Department of Health, Education, and Welfare, Letter to Dr. Robert H. Kupperman, Deputy Executive Director, Federal Property Review Board, October 20, 1971; Max Novinsky, Program Manager, Health Facilities, Memorandum for the Record dated March 13, 1972; copies provided by General Services Administration.

³⁴ "Special Background Report on Foods [sic] Beltsville Research Facility, Beltsville, Maryland," General Services Administration, 1983.

³⁵ John C. Droke, Director, Office of Administrative Management, Department of Health, Education, and Welfare, Memorandum to Deputy Assistant Secretary for Facilities, Engineering and Property Management, May 10, 1976, copy provided by General Services Administration.

³⁶ Charles H. Conrad, Executive Director, National Capital Planning Commission, Letter to William H. Hoffman, Chief of Long Range Facilities Planning, March 14, 1978, copy provided by General Services Administration.

³⁷ Dean K. Crowther, Director, US Department of Agriculture, Letter to C. A. Patterson, Director, Office of Real Property, Department of Health, Education, and Welfare, March 26, 1979, copy provided by General Services Administration; Max O. Urbahn Associates,

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planned laboratory buildings, was funded under this plan, permitting FDA to move forward with architectural design of the building, which took place from 1980 to 1982. Construction of Module I, which was built to accommodate research laboratories for small animal projects, began in 1983 (Figure 57), but due to delays it was not completed and occupied until 1991.³⁸ Around 1981, based on aerial photographs, the Washington Suburban Sanitary Commission built a water storage tank on a 5-acre area of the East Parcel along Odell Road (the South Laurel Water Pumping Station) (Figure 56).³⁹

Module I was designed by the partnership of Max O. Urbahn Associates, Inc./LBC&W, of Falls Church, Virginia. Max O. Urbahn (1912-1995) was a native of Germany who studied architecture at the University of Illinois and Yale University. Urbahn worked for John Russell Pope and Holabird & Root before founding his own firm in 1946. The firm designed many buildings for federal, state, and municipal agencies and private corporations and institutions, among them the enormous National Aeronautics and Space Administration (NASA) Vehicle Assembly Building at Cape Canaveral, Florida (1965), a 42-story skyscraper at 909 Third Avenue, New York City (1967), and the Federal Home Loan Bank Board Headquarters in Washington, DC (1973) for the GSA. Urbahn was president of the American Institute of Architects in 1972.⁴⁰ LBC&W was the incorporation of Lyles, Bissett, Carlisle, and Wolff, Architects and Engineers, incorporated in 1948 in South Carolina. The firm was one of the premiere architectural firms in the southeast United States from the 1950s to the 1970s, employing over 350 people in the 1960s with offices in Maryland; Washington, DC; Richmond, Virginia; Greensboro, North Carolina; and Columbia, Spartanburg, and Florence, South Carolina. LBC&W also designed many federal, state, and municipal buildings, including a number of US Army facilities, the South Carolina Senate Office Building and State House Complex, and several colleges and universities.⁴¹ Curiously, LBC&W is listed as dissolving in the late 1970s after its principal architects retired, before Module I was designed. Max O. Urbahn's AIA biography notes that he "was known as an architect who could assemble a team of experts to address a complex program"⁴² so he may have formed a short-term partnership with architects who were able to carry on the LBC&W name.

Although architectural design of the second laboratory building, Module II, took place from 1982-1986 (also designed by Urbahn Associates, this time without the LBC&W partnership), funding for the project was denied in the 1984 FY budget and the whole project was put on hold. In the early 1990s further development of the site was mired in a "bitter dispute" between Montgomery and Prince George's Counties over a proposed plan to consolidate the FDA's operations at a major site in one of the counties, which would bring thousands of jobs to the selected county. In 1991 it appeared that a compromise plan would create two sites, one in Montgomery County that would include senior management and drug-related functions, and one in Prince George's County for food and veterinary medicine research.⁴³ Over the next three years the size of the proposed facility in Montgomery County increased from 133 to 350 or 400 acres, which doubled the cost and necessitated a new site search to accommodate the increased program.⁴⁴ While the Montgomery County facility was delayed by the search for a suitable site, FDA already had architectural plans prepared and was able to move quickly in breaking ground for the expanded Beltsville site. This project included Module II (an addition to Mod I), and the Animal Research Facility on the west end of the site, including an aquaculture laboratory, thirteen research buildings, fenced pastures, and a central boiler/chiller utility plant.⁴⁵ Around 1993, the FDA stopped using the kennel facility at the BRF.⁴⁶ The kennels were removed and several metal barns were built on a portion of the kennel area between 1998 and 2002, based on aerial photographs (Figures 59 and 60).⁴⁷ Around 1993,

L.B.C.&W., Inc., and A. T. Kearney, Inc., "Final Environmental Impact Statement: Food and Drug Administration Headquarters Laboratory Facilities, Beltsville, Maryland," July 1981, III-47.

³⁸ Leo A. Daly, Tetra Tech, Inc., "Environmental Assessment of the Center for Veterinary Medicine," August 14, 1995, 2-5.

³⁹ HistoricAerials.com.

⁴⁰ "Max O. Urbahn is Dead at 83; Designed Vast NASA Building," *New York Times*, July 13, 1995; "Maximilian Otto Urbahn, FAIA," in R. Randall Vosbeck, Tony P. Wrenn, and Andrew Brodie Smith, *A Legacy of Leadership: The Presidents of the American Institute of Architects, 1857-2007* (Washington, DC: The American Institute of Architects, 2008), 124-126.

⁴¹ Andrew W. Chandler, "Lyles, Bissett, Carlisle & Wolff," *South Carolina Encyclopedia* (University of South Carolina, Institute for Southern Studies), June 8, 2016. <https://www.sccyclopedia.org/sce/entries/lyles-bissett-carlisle-wolff/>, accessed January 11, 2021.

⁴² "Maximilian Otto Urbahn," in *A Legacy of Leadership*, 126.

⁴³ Kent Jenkins, Jr., "Montgomery, P.G. Each Get FDA Offices," *Washington Post*, September 27, 1991.

⁴⁴ Kent Jenkins, Jr., "FDA Mulls Sites; Building Plan Could Expand," *Washington Post*, April 22, 1993, M01; Kent Jenkins, Jr., "Maryland Snares Two Huge FDA Projects," *Washington Post*, March 16, 1994, A1.

⁴⁵ Kent Jenkins, Jr., "FDA to Begin Work on Lab in Beltsville," *Washington Post*, April 14, 1994, BMD-1; Leo A. Daly, Tetra Tech, Inc., "Environmental Assessment of the Center for Veterinary Medicine," August 14, 1995, 2-5.

⁴⁶ Leo A. Daly, Tetra Tech, Inc., "Environmental Assessment of the Center for Veterinary Medicine," August 14, 1995, 3-43.

⁴⁷ HistoricAerials.com.

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the Maryland Army National Guard constructed a two-building armory facility on the East Parcel east of Odell Road and north of the South Laurel Water Pumping Station (Figure 58).

With the completion of Module II and the Animal Research Facility in the late 1990s, the MRC assumed its present appearance. As part of this project, a new main entrance was built from Muirkirk Road, the former access road to Mod I was removed and reforested, and a secondary entrance constructed from Odell Road for the delivery of new animals to a quarantine building at the entrance to the site in that area. At the same time, the FDA consolidated its headquarters at the repurposed Naval Ordnance Laboratory (Naval Surface Warfare Center) at White Oak in Montgomery County when the Navy's Base Realignment and Closure program left that property vacant.⁴⁸

EVALUATION OF ELIGIBILITY

The US Food and Drug Administration's Muirkirk Road Campus was evaluated in relation to historic contexts established in the statewide *Maryland Preservation Plan* (2005), Maryland-National Capital Park and Planning Commission's *Illustrated Inventory of Historic Sites and Districts, Prince George's County, Maryland* (2011) and *African-American Historic and Cultural Resources in Prince George's County, Maryland* (2012). Relevant contexts from those documents are: Agriculture/Agricultural Heritage (Criterion A), Economic/Industry (Criterion A), African American Heritage (Criterion A), Federal Presence (Criterion A), and Architecture/Community Planning (Criterion C).

Criterion A

Agriculture/Agricultural Heritage

Portions of the MRC, including the main campus and the East Parcel, were in agricultural use during the nineteenth and early twentieth centuries, initially as private farmland, and later as part of the United States Department of Agriculture's Beltsville Agricultural Research Center. By the mid twentieth century, most of the land comprising the MRC had filled in with successional growth. Although the general character of the campus remains pastoral, it does not retain any features associated with the previous agricultural use of the property, such as agricultural buildings, farm fields, fence lines, etc. It is therefore not significant for its association with the agricultural context of Maryland and Prince George's County.

Economic/Industry

The mine pits on the west portion of the MRC are related to the industrial context of Prince George's County, specifically the nearby Muirkirk Ironworks. The period during which these pits were worked, or how much iron was extracted from them, has not been established through research, although the Muirkirk Ironworks was in existence from 1847 to 1920. Previous historic and archaeological surveys have yielded no evidence of other iron industry-related features located on the campus and no evidence that these pits were important to the context of the Muirkirk Ironworks. Subsequent development of the site, including the conversion of this area into wetlands and ponds and the redeposition of soils from areas of construction elsewhere on the campus, have impacted remaining integrity. The Phase I Archaeological Investigation conducted concurrently with this DOE did not recover any artifacts in this area.⁴⁹ The campus is therefore not significant for its association with the industrial context of Prince George's County.

African American Heritage

The historic Black community of Rossville lies a few miles north and west of the MRC. As noted in the historic narrative, previous surveys of the Rossville community have not documented any Rossville-related sites within the MRC boundaries, and none were found during research for this DOE. The closest identified sites (i.e., Muirkirk School and Edward Gross House) lie just outside the boundary, and the Phase I Archaeological Investigation conducted concurrently with this DOE did not recover any artifacts associated with the community. The Rossville community is more importantly represented by the designated historic sites of the community itself and the Muirkirk Ironworks. The campus is therefore not significant for its association with African American heritage in Prince George's County.

⁴⁸ Leo A. Daly, Tetra Tech, Inc., "Environmental Assessment of the Center for Veterinary Medicine," August 14, 1995, 1-4, 205; Karl Vick, "Navy's White Oak Proposed as Site for FDA Complex," *Washington Post*, July 28, 1995, D1; Michael Abramowitz, "Hill Conferees Restore Funds for FDA Project in PG Only," *Washington Post*, September 14, 1995, B4.

⁴⁹ Stantec Consulting Services, "US Food and Drug Administration Muirkirk Road Campus Master Plan, Phase I Archaeological Investigations, Prince George's County, Maryland," Draft Report, January 5, 2021, 82-85.

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Federal Presence

The MRC is associated with the historic context of the decentralization of the federal presence in Washington, DC, and the development of federal installations in Maryland and Virginia in the twentieth century, specifically the Beltsville Agricultural Research Center (BARC) and the FDA's Muirkirk Road Campus. The property encompassing the current MRC and East Parcel was acquired by the USDA in the early twentieth century as part of the BARC. The property lies on the northern end of the BARC, outside of the historic district boundary of the BARC's Central Farm established in MHT's recent re-evaluation of the BARC's historic context. No important BARC-related research is documented to have taken place within the MRC boundaries. By the 1950s most of the land was covered by successional growth, and therefore it has no integrity related to the BARC period of occupation.

The US Food and Drug Administration built its Special Pharmacological Animal Laboratory on the MRC in 1963, shortly before the USDA transferred the 194-acre site to the Department of Health, Education, and Welfare. The large site provided ample housing and exercise space for the research animals, primarily dogs, who had previously been accommodated in cramped quarters at the BARC. The SPAL's work supported the FDA's mission of testing food additives and drugs to ensure the safety of the American consumer, and its construction provided much needed space that was designed to serve the needs of the FDA, rather than space adapted from previous uses. A review of FDA publications and histories, scientific literature, and interviews with FDA historians did not document historic significance associated with any food or animal science that would qualify the SPAL facility as eligible under Criterion A.

The SPAL area (now called the Beltsville Research Facility (BRF)), is the only area of the campus that was completed more than 50 years ago. Although the FDA immediately planned further development of the site in accordance with its 1966 site development plan, funding difficulties and other issues delayed further buildout of the campus until the 1980s. Because the purpose of the SPAL was animal research, and the kennels were a fundamental element of that work and the most distinctive feature of the facility, the loss of the kennels after 1998 has significantly impacted the integrity of this portion of the site. In addition, the remodeling of the SPAL building, including window reconfiguration/replacement and extensive interior alterations, has impacted its ability to convey importance from any potential period of significance. Subsequent development of the BRF area and the construction of the Module I/Module II and Animal Research Facility occurred less than 50 years ago. While the work carried out in these areas was and remains important to the FDA's mission, it does not meet the criteria for exceptional significance under Criteria Consideration G. The campus is therefore not significant for its association with the federal presence in Prince George's County.

Criterion B

A review of previous studies, FDA publications and histories, scientific literature, and interviews with FDA historians did not document any individuals whose specific contributions while working at the campus would qualify the Muirkirk Road Campus as eligible under Criterion B, association with important persons.

Criterion C

One building, the Special Pharmacological Animal Laboratory, was constructed at the MRC more than 50 years ago. Designed by the Washington, DC, office of the Philadelphia-based George M. Ewing firm and completed in 1962-1963, the SPAL is a modest, one-story utilitarian building constructed of beige brick walls interspersed with large window and door bays and minimal architectural ornamentation, design elements that were characteristic of mid-century institutional buildings. Extending behind the SPAL were five cross-shaped kennel buildings connected by covered walkways. While the George M. Ewing firm was an important design firm during this period, the SPAL is not a distinctive or important example of their work, which included major federal facilities such as St. Elizabeth's Hospital in Washington, DC, the US Naval Academy in Annapolis, Maryland, as well as numerous state, municipal, and private clients in the Philadelphia metropolitan area. The SPAL was also not featured in design publications of the period, aside from a brief paragraph in a listing of current projects in the January 1963 edition of the *Architectural Forum*, and it was not honored with any design awards. Additionally, the SPAL has suffered significant impacts to its integrity, specifically the windows, whose original configuration and proportions have been radically altered, and its interior, which was extensively remodeled, most recently circa 2005. The most distinctive elements of the SPAL's original design (and the one specifically mentioned in *Architectural Forum*) were the cross-shaped kennels, which were integral to the facility's purpose and function. These were removed from the property between 1998 and 2002. The SPAL therefore is not significant under Criterion C and has lost integrity since its original construction.

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The remaining buildings on the campus were constructed in the 1980s and 1990s. To qualify for significance under Criterion C, their design would have to be exceptionally important to meet Criteria Consideration G, for properties less than 50 years of age. Although Max O. Urbahn Associates was also an important design firm during this period, the MRC buildings are not exceptionally distinctive or important examples of their work in comparison to other government facilities cited as key designs in the company's history, such as the NASA Vehicle Assembly Building at Cape Canaveral or the Federal Home Loan Bank Board Headquarters in Washington, DC. The Module I and II buildings have not been cited as important designs in any architectural journals or surveys of important or characteristic design of the period that would merit a determination of exceptional importance, and therefore do not meet Criteria Consideration G.

The design of the campus also dates to less than 50 years ago. Although the general spatial organization and some specific characteristics of the campus were established in the 1966 Site Development Plan, the design was considerably altered, first when the plan was updated in 1980, and later when the site designs for Module II and the Animal Research Facility were finalized and carried out in the mid to late 1990s. There is no context within which the campus landscape design qualifies as exceptionally important under the guidelines for Criteria Consideration G.

Criterion D

Concurrently with the preparation of this DOE, a Phase I Archaeological Survey was carried out for the MRC as part of this project, consisting of context research and field investigations of the MRC and the East Parcel, including testing of 1,769 locations. The survey report noted moderate to extensive disturbance from mining activities in the southern and western portions of the MRC, but survey of potentially intact deposits in this area did not yield any artifacts, nor were there any artifacts recovered from elsewhere on the MRC. Previous archaeological investigations in 1981 also found no artifacts or archaeological resources within the MRC main parcel. One pre-contact site was identified on the East Parcel. Sixty-two artifacts from the Middle Archaic to Early Woodland periods were recovered from 41 positive shovel test pits over a 5.8-acre area. Based on these findings, the report recommends that this site (site number pending) be considered potentially eligible for listing in the National Register of Historic Places under Criterion D, and that further testing be conducted prior to further development to evaluate the characteristics and features of the site's occupation and to confirm its eligibility for listing. The Phase I Archaeological Survey also summarizes investigations carried out in nearby areas and notes that "of the 19 archaeological sites identified within 1.6 km (1 mile) of the study area, 9 have been evaluated as not eligible for listing in the NRHP...the remaining tens sites have not been evaluated."⁵⁰

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Quinn Evans

Date Prepared: January 29, 2021

⁵⁰ Stantec Consulting Services, "US Food and Drug Administration Muirkirk Road Campus Master Plan, Phase I Archaeological Investigations, Prince George's County, Maryland," Draft Report, January 5, 2021, iii, 44, 87.

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