

Executive Director's Recommendation

Commission Meeting: June 7, 2012

PROJECT Phase 1 (North Campus)

Intelligence Community Campus--Bethesda 4600 Sangamore Road Bethesda, Maryland

SUBMITTED BY

United States Army Corps of Engineers on behalf of the Defense Intelligence Agency

REVIEW AUTHORITY

Federal Projects in the Environs per 40 U.S.C. § 8722(b)(1)

NCPC FILE NUMBER 7326

NCPC MAP FILE NUMBER 3101.10(38.00)43567

APPLICANT'S REQUEST Preliminary and final approval of site and building plans

PROPOSED ACTION Approve with conditions

ACTION ITEM TYPE Staff presentation

PROJECT SUMMARY

The United States Army Corps of Engineers, on behalf of the Defense Intelligence Agency, has submitted preliminary and final site and building plans for Phase 1 (the North Campus) of the Intelligence Community Campus—Bethesda (ICC-B), a federal facility at 4600 Sangamore Road in Bethesda, Maryland. The ICC-B North Campus project consists of all redevelopment and construction activities on the northern 12 acres of the ICC-B facility, which will achieve the goals and vision for this area that were set forth within the site's master plan (formally known as the Site Development Guide). These improvements include the construction of a new Visitor Control Center, Vehicle Inspection Station, multi-story parking garage, temporary site access from Sangamore Road, and associated site, security, landscaping, and similar improvements. The principal existing feature and use of the North Campus area is surface asphalt parking. The redevelopment calls for the removal of this parking lot and the construction of the above described facilities.

KEY INFORMATION

- The North Campus site and building plans limit on-site deforestation to 0.45 acres. This is more than the Commission requested target of 0.2 acres but less than the 0.75 acres presented to the Commission with the approval of the ICC-B master plan in February 2012.
- The North Campus storm water management plan achieves on-site retention and filtering of storm water that is above Maryland Department of the Environment requirements (the governing requirements for storm water management at the ICC-B site), and approaches the Commission requested target of treating and retaining 100 percent of storm water for a 25-year storm that the Commission requested with the approval of the ICC-B master plan in February 2012.

- As employees associated with the Defense Intelligence Agency currently occupy some portions of the South Campus and will continue to do so throughout the installation's redevelopment, the North Campus project will allow for a practical delineation between this existing work-force and ongoing construction activities. That is, during the North Campus project, employees will be confined to the southern portion of the campus, and contractors and construction activities will take place on the north side. After redevelopment of the North Campus is complete, employees will enter and park on the North Campus and then access the office facilities from the north side, and contractors will access and complete construction activities on the South Campus (Phase 2).
- The Visitor Control Center is approximately 4,000 square feet, the Vehicle Inspection Station is approximately 5,600 covered square feet, and the parking garage is approximately 93,500 square feet.
- Within the Limit of Disturbance for construction of the 12-acre North Campus site, final site coverage will be approximately 4.3 acres of impervious surface and 6.2 acres of pervious surfaces, with the remainder acreage remaining in its existing natural or landscaped state.
- The Defense Intelligence Agency continues to work with all involved parties towards achieving a solution to erosion remediation in the adjacent National Park.

RECOMMENDATION

The Commission:

Approve the preliminary and final site and building plans for Phase 1 (North Campus) of the Intelligence Community Campus—Bethesda at 4600 Sangamore Road in Bethesda, Maryland, with the exception of the final site development plans for the landscape/hardscape, furniture, site security (bollards, barriers, etc.) and site lighting.

Delegate to the Executive Director approval of the final site development plans for the landscape/hardscape, furniture, site security (bollards, barriers, etc.) and site lighting as the design packages for these elements are currently under development.

PROJECT REVIEW TIMELINE

Previous actions	December 1, 2011 – The Commission deferred action on the ICC-B master plan and required the applicant to evaluate alternatives to the size, location and capacity of the parking garage to include exclusion of parking from the secured perimeter.
	(NCPC File No: MP7257)
	February 2, 2012 – The Commission approved the ICC-B master plan for use as a guide for future reviews of individual site and building projects at the installation.

	This approval contained a number of notations and requests of the applicant, and specifically requested the applicant to set targets for limiting on-site deforestation to no more than 0.2 acres and for designing storm water management facilities with the goal of treating and retaining 100 percent of storm water for a 25-year storm.
	How the applicant has met these requests within this current North Campus submission is described within the Project Analysis / Conformance section below.
	(NCPC File No: MP7257)
	April 5, 2012 – The Commission received an information presentation by the applicant on its efforts to meet the deforestation and storm water targets requested by the Commission at its February 2, 2012 approval of the master plan.
Remaining actions	 Approval of final site and building elements within the North Campus.
	 Approval of preliminary and final site and building plans for the ICC- B's Phase 2 (South Campus), which includes the redevelopment of existing installation's structures and additional site development.

Prepared by Jeffrey L. Hinkle June 4, 2012

I.	Project Description	6
	Site / Background	6
	Proposal	.11
II.	Project Analysis/Conformance	.27
	Executive Summary	.27
	Analysis	.27
	Comprehensive Plan for the National Capital	.31
	Relevant Federal Facility Master Plan	.31
	National Environmental Policy Act (NEPA)	.32
	National Historic Preservation Act (NHPA)	.32
III.	Consultation	32
	Coordination with local agencies	.32
IV.	Appendix	33

Figures and Maps

Figure 1: Site location	6
Figure 2: Aerial of the site and surrounding community	. 8
Figure 3: Birdseye view of the existing condition of the installation, looking west.	. 9
Figure 4: Illustrated view of the proposed concept for the Intelligence Community Campus- Bethesda, looking northwest	.10
Figure 5: Illustrated perspectives of proposed concept to consolidate the existing structures with the new Centrum building, as viewed from Sangamore Road	ith .11
Figure 6: Phasing map	.12
Figure 7: Proposed Limit of Disturbance (limits of clearing and grading)	.13
Figure 8: Illustrative site plan	.14
Figure 9: Garage sixth-level plan	.15
Figure 10: Garage elevations	.16
Figure 11: Site plan for the Vehicle Inspection Station.	.17
Figure 12: Elevations of the Vehicle Inspection Station.	.18
Figure 13: Site plan of the Visitor Control Center.	.19

Figure 14: Elevations of the Visitor Control Center	20
Figure 15: Storm water management plan.	22
Figure 16: Storm water management plan diagram	23
Figure 17: Illustrative site plan	26

I. PROJECT DESCRIPTION

Site / Background

As part of the 2005 Base Realignment and Closure Act (BRAC), the National Geospatial-Intelligence Agency (NGA) consolidated its operations in the National Capital Region. As part of this effort, NGA recently vacated their headquarters facility at 4600 Sangamore Road in Bethesda, Maryland and relocated to Fort Belvoir's North Area in Springfield, Virginia.

As an Army facility, the United States Army Corps of Engineers (USACE) is redeveloping the Sangamore Road property for a secure campus, the Intelligence Community Campus—Bethesda (ICC-B), which will support numerous Intelligence Community¹ activities. The Intelligence Community currently has operations at the site with approximately 400 employees.



Figure 1: Site location.

¹ The U.S. Intelligence Community is a coalition of 17 agencies and organizations within the executive branch that work both independently and collaboratively to gather the intelligence necessary to conduct foreign relations and national security activities. Source: http://www.intelligence.gov/about-the-intelligence-community/

The ICC-B site was initially developed during the 1940's and has evolved over the past 70 years to include approximately 39 acres.

The ICC-B property was originally deeded to the U.S. Government in 1945 through a court decree for uses in connection with expansion of the Army Map Service during World War II, as well as other public uses. At the time of the site's establishment as a federal facility, the Army Map Service was headquartered a short distance south on MacArthur Boulevard, at what is known as the Dalecarlia Site. With its establishment, the site became known as the Sumner Site.

Current development on the ICC-B site includes approximately 716,500 gross square feet of structures. These structures, combined with approximately 12.5 acres of pavement for 1,550 atgrade personal vehicle parking spaces and other vehicular infrastructure, result in a total amount of impervious surface area of 19.6 acres, or 67 percent of the site.

The area of Bethesda surrounding the ICC-B site is a densely-developed, mixed-use area.

Existing nearby development includes a major retail development known as The Shoppes at Sumner Place, located directly across Sangamore Road from the site, and a mixture of single and multifamily residential properties with scattered forested areas northwest, east, and southeast of the site.

The Washington Waldorf School, a private K-12 school, and the 6.7-acre Montgomery County Sangamore Local Park, are located immediately north of the site. The Sangamore Local Park contains a playground, soccer/baseball field, and two tennis courts. A small wooded strip with a public trail from Sangamore Road to the park separates the school from the project site.

The Clara Barton Parkway within the George Washington Memorial Parkway (GWMP), as well as the C&O Canal National Historic Park (C&O Canal NHP), both National Parks, are immediately west of the site within the Gorge of the Potomac River. The GWMP was enabled through the Capper-Cramton Act of 1930, which charges the GWMP with the "protection and preservation of the natural scenery of the Gorge and Great Falls of the Potomac." In 1971, the C&O Canal NHP, as legislated through the Chesapeake and Ohio Canal Development Act, was imparted with the mission "to preserve and interpret the historic and scenic features of the Chesapeake and Ohio Canal."² At the rear (west side) of the site, the land slopes towards the Potomac River with a drop of approximately 150 vertical feet. This topographic relief and associated mature forest, also known as the Potomac Palisades, is within the National Parks.

While the ICC-B complex is screened by trees from adjoining public and private land uses to the north, west and south, its presence along Sangamore Road is not visually positive to the surrounding community. Existing facilities on site are showing their age, and the extensive at-grade parking and numerous longstanding security measures have resulted in visual and

² Letter from the National Park Service to the USACE, submitted on January 10, 2012, contained in the appendix of the master plan Executive Director's Recommendation report (NCPC File No: MP7257).

operational impacts that negatively impact affect the surrounding community and the site's employees.



Figure 2: Aerial of the site and surrounding community.

in part from the Army Map Service.

As noted above, the site was most recently used as the headquarters of the NGA, which evolved

While historic employment levels have varied over time, specific historical employment numbers at the site have been difficult to obtain and vary widely, with the USACE reporting a high of up to 3,900 federal employees located at both the ICC-B (Sumner) and Dalecarlia Sites. The USACE has reported that under BRAC, the NGA transferred 2,430 full-time equivalent personnel from its operations at the site.

The historic total number of available or necessary parking spaces for employees at the site is also unclear. While 1,550 parking spaces are currently on site, when the NGA occupied both the Sumner and Dalecarlia Sites, a portion of the employees that worked on the Sumner Site parked at the Dalecarlia Site, and the NGA maintained an employee shuttle between the two. In addition, the NGA received public comment regarding employees parking within the neighborhood and the retail establishment across Sangamore Road during the 2001 Environmental Assessment that was completed when the NGA consolidated some of its operations at the site.



Figure 3: Birdseye view of the existing condition of the installation, looking west (the installation fronts Sangamore Road, which runs through the center of the photograph).

At its February 2, 2012 meeting, the Commission approved the ICC-B master plan for use as a guide for future reviews of individual site and building projects at the installation. The master plan (formally titled the Site Development Guide) guides the redevelopment of the site into a secure campus for Intelligence Community activities, with a design capacity of 3,000 employees at the site.



Figure 4: Illustrated view of the proposed concept for the Intelligence Community Campus-Bethesda, looking northwest (the installation continues to front Sangamore Road, which runs diagonally across the right side of the illustration). Note that the illustration does not reflect the current proposed size and location of the parking garage or alignment of the access road.

The ICC-B campus currently consists of five primary buildings: Abert Hall, Emory Hall, Erskine Hall, Roberdeau Hall, and Maury Hall. A visitor center and gate facility is also on the installation, near the perimeter adjacent to Sangamore Road.

Under the proposed redevelopment of the installation, Erskine Hall, Roberdeau Hall, and Maury Hall will remain; Emory Hall, Abert Hall, as well as the visitor center and gate facility will be demolished. Connecting the remaining buildings will be a two-story NIB (New Infill Building) and a new five-story Centrum, with a new entry into the consolidated building provided on the north side of the Centrum. A new Visitor Control Center will be located immediately north of the new entry. The occupiable space previously allocated to Emory Hall and Abert Hall will be recaptured within the new Centrum and the NIB. Overall, the gross square footage on campus will increase from 716,500 to 854,300 (an increase of 137,800). Along with these improvements are the construction of a vehicle inspection station, multi-story 1800-space parking garage, temporary site access road, and associated site, security, landscaping, and similar improvements.



Figure 5: Illustrated perspectives of proposed concept to consolidate the existing structures with the new Centrum building, as viewed from Sangamore Road (note that proposed site landscaping has been omitted to enhance building clarity in perspectives). The consolidation, or redevelopment, of the main existing structures within the South Campus area of the installation will part of Phase 2 (and is not under review with this current submission to the Commission).

Proposal

The ICC-B North Campus project consists of all redevelopment and construction activities on the northern 12 acres of the ICC-B facility in order to achieve the goals and vision set forth in the master plan approved by the Commission at its February 2, 2012 meeting.

The exiting principle feature and use of the North Campus site is surface asphalt parking. Redevelopment of the North Campus calls for the removal of this parking area and the construction of a multi-story parking structure, a vehicle entrance from Sangamore Road, a Vehicle Inspection Station (VIS), a Visitor Control Center (VCC), a small visitor parking lot, and associated site landscaping and security improvements.

As employees associated with the Defense Intelligence Agency currently occupy some portions of the South Campus and will continue to do so throughout the installation's redevelopment, the North Campus project will allow for a practical delineation between this existing work-force and ongoing construction activities. That is, during the North Campus project, employees will be confined to the southern portion of the campus, and contractors and construction activities will take place on the north side. After redevelopment of the North Campus is complete, employees will enter and park on the North Campus and then access the office facilities from the north side, and contractors will access and complete construction activities on the South Campus (Phase 2).

The North Campus is comprised of approximately 12 acres on the northern portion of the site and encompasses the entire northern property boundary, the eastern property boundary along Sangamore road to approximately the location of the existing Visitor Control Center, and western boundary to approximately the northwest corner of Maury Hall near the campus' electrical substation.



Figure 6: Phasing map. Phase 1 (North Campus) includes construction of the new parking garage, Entry Control Facility, Visitor's Control Center and the site access road. A construction period of approximately 14 months is anticipated to complete these improvements depending on the extent of related underground utility work that must be conducted in association with these projects. As Phase 1 of construction gets underway, design of Phase 2 (South Campus) will begin. Phase 2 includes the demolition of Abert and Emory Halls, construction of the Centrum, unification of the building façade, interior renovations, and site improvements. Completion of Phase 2 will take approximately 3-4 years.

North Campus Components

Redevelopment of the installation is programmed to optimize the use of the existing assets on the site, while improving the safety, functionality and sustainability of the site's operations. A core objective of this approach is to significantly improve the architectural presence of the facility by reducing the amount of at-grade parking and providing enhanced green spaces around the new and redeveloped site structures. A cornerstone element to achieving this objective will be the construction of the proposed multi-story parking garage in the northwestern portion of the installation.

Since the Commission approved the ICC-B master plan, the USACE has continued to work with the community to locate the proposed 1,800-space parking garage so that its impacts on the site's forested area is limited to less than 0.45 acres. In addition, the USACE has designed the vehicle entrance from Sangamore Road, the Vehicle Inspection Station, and the Visitor Control Center and visitor parking lot as far away from the northern property line as is feasible to reduce the their impacts to the exiting landscaping along the northern property boundary.

As such, while the total North Campus site encompasses 12 acres, the Limit of Disturbance for construction of the North Campus will be approximately 10.5 acres, with 4.3 acres of impervious surface and 6.2 acres of pervious surfaces. The remainder is the landscaped and natural areas along the western and northern property boundaries as depicted in the figure below.



Figure 7: Proposed Limit of Disturbance (limits of clearing and grading).

The general location of the proposed garage, as well as the other proposed elements of the North Campus, is identified in the illustrative site plan below.



Figure 8: Illustrative site plan.

The elements of the North Campus are described below, including the parking structure, the vehicle entrance from Sangamore Road, the Vehicle Inspection Station, the Visitor Control Center and associated parking lot, and other landscape improvements.

Parking Garage

The proposed parking garage is a six-story precast concrete structure with 1,800 parking spaces. Access to the garage is from four lanes (two entry / two exit) on the north side of the structure and two lanes (one entry / one exit) on the east side of the structure. With the site's topography, the garage's north side vehicular entrance and exit will be at the garage's third level, while the east side vehicular entrance and exit will be on the second level. The northeast and southeast corners of the garage will contain glass and gray-metal clad stair towers that will echo the architectural palette of the redeveloped installation, and another glass and grey-metal clad stair / elevator tower will be located in the center of the east façade of the garage. This central tower

will contain the primary pedestrian access to the garage, connecting to the installation's primary pedestrian path system.

A photovoltaic (PV) array is planned to be placed above the ramp on the upper (sixth) level. The PV system is sized to annually produce enough energy to offset the amount of energy consumed by the Visitor Control Center and Visitor Inspection Station, resulting in Net Zero facilities (that is a building in which the amount of energy provided by on-site renewable energy sources is equal to the amount of energy used by a building in a one year period). The PV system size was driven by a building energy analysis estimated the annual building energy consumption, and which indicates that the Visitor Control Center and Visitor Inspection Station will consume 66,152 kilo-watt hours (kWh) of energy annually. The size of the currently designed PV system is estimated to produce 73,847 kWh in its first year of operation, and is slightly oversized to account for loads and building operation methods that are currently unknown.



Figure 9: Garage sixth-level plan. The garage has a four-bay layout with the ramp contained in one central bay. At the sixth-level the ramp is covered with a roof structure, creating a penthouse, which will hold a photovoltaic array.

A penthouse structure is proposed to support the PV array. Located within the central area of the upper (sixth) level and with a height of 10 feet (not including the PV array itself) above the top

parking level of garage, and due to the area topography and approximate 4-foot parapet at the top garage level, the penthouse structure will be difficult to view from the ground level.³ In particular, from the west and south sides the ground slopes down dramatically which would result in the inability to see the penthouse structure from ground level. From the east, portions of the penthouse structure may be visible from Sangamore Road, however, the garage's parapet and central stair tower on its west façade, as well as other site structures and landscaping would make it minimally visible at this location.



Figure 10: Garage elevations.

As approved within the master plan, three levels of the garage will be placed below the elevation of the existing parking lot, and a reverse berm will shield the lower levels from view from the south and west (the Potomac River gorge). (On the north side the lower two levels will be below grade and the third level will be below the elevation of the existing parking lot.) To further screen the garage from the south and west views, a vegetated green screen will be provided on the upper levels of the garage (up to the top of the upper level parapet). The ridge line (denoting

³ The sixth-level penthouse structure is currently sited approximately 61 feet from the garage's west façade, 141 feet from the garage's north façade, 120 feet from the garage's east façade, and 93 feet from the garage's south façade.

the portions of the garage below the reverse berm) and the proposed vegetated green screen treatment can be seen in the elevations of the garage below.

The garage has a four-bay layout with one bay acting as a central ramp. Approximately 300 parking spaces are located on each of the six levels. Of the 1,800 parking spaces within the garage, 240 will be reserved for fleet and carpool vehicles and other similar uses.

Bicycle parking will be incorporated within the garage, and an additional bicycle parking area will be located adjacent to the roadway that runs along the eastern edge of the garage.

Vehicle Entrance to Site and Vehicle Inspection Station

The new vehicle entrance will be located in the northeastern corner of the installation and extend directly to Sangamore Road. This configuration will be used while the remainder of the installation—Phase 2 (South Campus)—is redeveloped. Towards the end of construction of the South Campus, the access roadway will be brought further to the south in a serpentine manner so that vehicular access onto the installation will occur at the intersection of Sentinel Drive and Sangamore Road (its current location).

The access roadway will lead from the installation's entrance at Sangamore Road to the Vehicle Inspection Station (VIS), and contain two entry and two exit lanes. At the VIS, the roadways will be configured and outfitted with traffic controls to allow three entrance lanes and one exit lane to accommodate morning traffic onto the installation. This design is intended to manage morning traffic queues on-site. The new access roadway will provide normal stacking of vehicles of up to 28 vehicles, which can be compressed to 40 vehicles as needed. This will eliminate the historical practice of stacking vehicles on Sangamore Road. Throughout the remainder of the day the VIS will maintain the gates with two entrance lanes and two exit lanes.

The north side of the VIS will contain a separate single lane for truck screening.



Figure 11: Site plan for the Vehicle Inspection Station.

To accommodate personnel and operations at the VIS, three guard booths are planned to be placed between the personal vehicle entrance and exit lanes. A larger structure containing additional guard facilities, including a restroom and guard dog area, will be placed between the northernmost personal vehicle lane and the truck inspection lane. An L-shaped canopy, that measuring approximately 90 feet by 70 feet on its longest sides, will cover the entire VIS facility (approximately 5,600 covered square feet). The facility is approximately 20 feet in height. The VIS will be clad in gray-metal and feature a glass façade on its main building element that faces the street. Its architecture will echo the architectural palette of the redeveloped installation.

A set of vehicular barriers will be within the roadway near the entrance to the installation at Sangamore Road, and another set of vehicular barriers will be located within the roadways near the northeastern corner of the garage. Four parking spaces are included in the of the site design for the VIS, two are immediately west of the VIS and two are south of the area designated for personal vehicle inspection. These spaces will be reserved for use by security police and K-9 officers.



Figure 12: Elevations of the Vehicle Inspection Station.

Total building occupancy for the VIS is anticipated to be 5 employees, with intermittent occupancy throughout a 24 hour period.

Page 19

Though certification under the United States Green Building Council's Leadership in Energy and Environmental Design (LEED) Building Design and Construction green building rating system will not be sought for the VIS as it does not meet the minimum program requirements for LEED certification, the project team will be employing strategies that will ensure that the final product, as much as possible, meets the credit criteria for LEED certification.

Visitor Control Center

The Visitor Control Center (VCC) is designed to be a welcoming feature to visitors of the installation. Located immediately south of the VIS, the VCC is sited to relate to the future primary entrance of the future redeveloped buildings on the South Campus, and will be used to screen visitors prior to their entrance into the main secured area of the installation.

The facility is designed with extensive use of energy efficient glass walls on its north, east and south sides, with the intent to use natural daylight for most of its daytime lighting. Its design is also intended to connect its interior to the surrounding outdoor spaces. Apart from the glass, the remainder of the exterior will be clad in grey-metal to echo the architectural palette of the redeveloped installation. The facility is approximately 85 feet by 46 feet, for an approximate 4,000-square-foot floor plate, and is approximately 19 feet in height. The total building occupancy for VCC is anticipated to be 38 with intermittent occupancy throughout any 24 hour period and staff only during evening hours.

Associated with the VCC is a 24-space visitor parking lot. The lot is provided to visitors to both park as they are visiting the facility, or park as they receive their visitor credentials that will allow them to proceed through the VIS and park within the garage. Bicycle parking is also provided adjacent to the visitor parking lot for both visitors and employees.



Figure 13: Site plan of the Visitor Control Center.

Pedestrian pathways (one accessible, one with stairs) will connect the VCC with a pedestrian gate at Sangamore Road. Other accessible pathways will lead from the VCC west to connect with the temporary entrance of the occupied portions of the South Campus and the garage.

The VCC project will be seeking formal LEED certification; therefore the project team will be employing strategies to ensure that the final product meets the credit criteria for LEED Gold certification, with the potential to achieve Platinum level certification.



Figure 14: Elevations of the Visitor Control Center.

Storm Water Management

The guiding regulations for storm water management at the ICC-B site are those established by the Maryland Department of the Environment (MDE), which is required to implement a statewide stormwater management program to control runoff from development. As such, MDE has developed the Maryland Stormwater Management Guidelines for State and Federal Projects, which serves as guidance to state and federal agencies to develop storm water management plans, and supplements the 2000 Maryland Stormwater Design Manual (and subsequent revisions)⁴. The overall goal of the regulations is to manage storm water by using Environmental Site Design⁵ (ESD) to the maximum extent practicable (MEP) to reduce stream channel erosion, pollution, siltation, sedimentation, and local flooding, and to use appropriate structural best management practices (BMPs) only when necessary. As such, the storm water management plan for the ICC-B North Campus has been designed to meet all, and exceed in several factors, MDE requirements.

The complete storm water management design for the North Campus is currently scheduled to be submitted to the Maryland Department of the Environment (MDE) towards the end of June or early July, 2012. Though not yet completely engineered, the summary and intent of this plan was provided by the USACE and illustrated in the Storm Water Management summary drawing below. This drawing represents a progression in storm water management from the intent stated during the USACE's April 2012 informational briefing to the Commission, and contains storm water elements that exceed MDE standards, specifically:

- The design accounts for treatment of water from all areas of the North Campus.
- The detention structure north of the garage has been significantly increased in capacity over the original MDE permit design (from approximately 88,000 gallons to approximately 187,000 gallons) and additional detention structures have been placed on site (on holding approximately 28,000 gallons and another holding approximately 26,000 gallons, for total on site retention of approximately 240,000 gallons).
- A reduction in the size of the bio-retention pond in the southeast corner of the garage, from a capacity of approximately 37,000 gallons to approximately 13,000 gallons. While still at a capacity greater than MDE requirements, the size reduction in the pond may allow for an in-the-field reduction of the number of trees affected by its construction.

⁴ Montgomery County regulations require stormwater management plans for redevelopment projects to be designed using environmental site design sizing criteria, recharge volume, water quality volume, and channel protection storage volume sizing criteria in accordance to the Maryland Stormwater Design Manual, and any applicable regulation.

⁵ Environmental site design (ESD) means using small-scale stormwater management practices, nonstructural techniques, and better site planning to mimic natural hydrologic runoff characteristics and minimize the impact of land development on water resources.



Figure 15: Storm water management plan.



Figure 16: Storm water management plan diagram. Storm water from the access drive, Visitor Control Center, Visitor Inspection Station, and garage is routed to the underground detention system and filter and released via the northwest corner outflow. Storm water from the roadway adjacent to the west side of the garage is routed to the bio-detention pond where it is filtered and released at the southwest corner outfall. Other stormwater is captured within the on-site pervious surfaces.

The MDE requirements for storm water management for redevelopment projects include the following:

- Environmental Site Design (ESD) must be implemented to the Maximum Extent Practicable (MEP) to provide water quality treatment for a minimum of 50 percent of the existing impervious area within the Limit of Disturbance (LOD). To meet storm water management requirements for redevelopment using ESD, treatment must be provided for the runoff from 1 inch of rainfall for 50 percent of the redeveloped impervious area. Quantity management, including design management practices to control stream channel erosion, is not required.
- The redevelopment designs must reduce existing impervious areas within the project Limit of Disturbance by a minimum of 50 percent. When a combination of impervious

area reduction and ESD implementation is used, the combined reduction and treated areas must be equal to, or exceed, 50 percent of the existing impervious area within the LOD. When redevelopment reduces the impervious area within the LOD by 50 percent or more, water quality treatment is satisfied.

• Where conditions prevent impervious area reduction and/or the implementation of ESD to the MEP, alternative management practices may be considered, including on-site storm water filtering systems, open channel systems, storm water infiltration, and storm water ponds.

Within the Limit of Disturbance for construction of the 12-acre North Campus site, the existing 8.2 acres of impervious surface will be reduced to approximately 4.3 acres of impervious surface (a reduction of approximately 47 percent). As such, the plan for the redeveloped North Campus nearly meets the 50 percent minimum reduction in impervious areas. However, as conditions prevent further impervious area reduction and the implementation of additional ESD to the MEP, and the USACE has made a decision to treat water for the entire North Campus site, alternative management practices will be used, including an underground detention and filtering system and a bio-retention pond.

The proposed underground storage vaults and bio-retention pond will provide treatment of 254,524 gallons. Using MDE's Required Water Quality Volume Equation it would equate to 2.1inches of precipitation across the Limit of Disturbance. This is double the requirement to treat the first inch from impervious surfaces. The MDE Required Water Quality Volume is an equation that factors in impervious area and pervious areas. (The previously approved MDE documents provided 89,878 gallons of storage, only providing treatment for the proposed parking structure and access road. As the USACE has made a decision to treat water for the entire North Campus site, MDE would require treatment of 119,808 gallons.) In addition, the storm water management system for the North Campus has the capacity to pass through the volume of a 25-year storm before the system overflows.

The proposed improvements to the North Campus, without the implementation of any detention structures, would reduce the amount of storm water runoff from the North Campus through the reduction of the impervious areas and would meet the MDE requirements for detention of the 10-year pre vs. post storm event. By providing and maximizing the proposed underground detention structures, the USACE will significantly reduce the rate at which storm water runoff is discharged from the site. In particular, the peak storm water discharge rate from the northwest outfall will be reduced between 20 to 80 percent from the current site condition. This reduced peak discharge rate, coupled with a new MDE compliant design for the northwest outfall will significantly reduce the potential for downstream adverse erosive effects.

Considering the two factors of detention and slowed rate of runoff the overall stormwater condition of the North Campus will be improved beyond the MDE storm water management requirements.

Storm Event:	Precipitation (Inches):	Volume (Gallons):	
1-inch of Precipitation	1	285,927	
1-yr - 24 Hour	2.6	743,427	
2-yr - 24 Hour	3.2	914,985	
5-yr - 24 Hour	4.08	1,166,614	
10-yr - 24 Hour	5.1	1,458,264	
25-yr - 24 Hour	6.11	1,747,056	
100-yr - 24 Hour	7.2	2,058,723	

Volume of water (gallons) that falls on the North Campus for a given storm event

(within the Limit of Construction of 10.53 acres)

Gallons released at each North Campus outfall (existing and proposed design) for a given storm event

	Existing	Proposed
Storm Event:	Gallons per Minute:	Gallons per minute:
1-yr - 24 Hour	10,206	1,795
2-yr - 24 Hour	13,312	3,142
5-yr - 24 Hour	17,877	8,079
10-yr - 24 Hour	23,151	18,851
25-yr - 24 Hour	28,348	23,788
100-yr - 24 Hour	33,932	29,174
Outfall 2 - Southeast Corner	r* Fristing	Proposed
<i>Outfall 2 - Southeast Corner</i> Storm Event:	r* Existing Gallons per Minute:	Proposed Gallons per minute:
<i>Outfall 2 - Southeast Corner</i> <u>Storm Event:</u> 1-yr - 24 Hour	r* Existing <u>Gallons per Minute:</u> 12,612	Proposed Gallons per minute: 12,388
<i>Outfall 2 - Southeast Corner</i> <u>Storm Event:</u> 1-yr - 24 Hour 2-yr - 24 Hour	F* Existing <u>Gallons per Minute:</u> 12,612 18,860	Proposed Gallons per minute: 12,388 15,781
<i>Outfall 2 - Southeast Corner</i> <u>Storm Event:</u> 1-yr - 24 Hour 2-yr - 24 Hour 5-yr - 24 Hour	<pre> Existing Gallons per Minute: 12,612 18,860 24,870</pre>	Proposed Gallons per minute: 12,388 15,781 23,716
<i>Outfall 2 - Southeast Corner</i> Storm Event: 1-yr - 24 Hour 2-yr - 24 Hour 5-yr - 24 Hour 10-yr - 24 Hour	Existing <u>Gallons per Minute:</u> 12,612 18,860 24,870 31,813	Proposed <u>Gallons per minute:</u> 12,388 15,781 23,716 30,731
Outfall 2 - Southeast Corner Storm Event: 1-yr - 24 Hour 2-yr - 24 Hour 5-yr - 24 Hour 10-yr - 24 Hour 25-yr - 24 Hour	Existing Gallons per Minute: 12,612 18,860 24,870 31,813 38,698	Proposed Gallons per minute: 12,388 15,781 23,716 30,731 37,567

*Note—Outfall 2 in the Southeast Corner primarily serves storm water runoff from the South Campus. Development of the South Campus and associated storm water management will be completed under a separate planning and permitting process.

On May 11, 2012, the MDE issued an Erosion and Sediment Control Permit for the North Campus project based on the revised site plan that was presented to the Commission at the USACE's April 2012 informational brief. This site plan and associated Limit of Disturbance includes 0.45 acres of potential wooded-area impact as previously presented. The permit allows for construction preparation and demolition activities, but does not allow placement of "permanent features". Activities such as the placement of silt fences, temporary drainage, and other preparatory features (including asphalt/curb removal and utilities relocation) are commencing on the ICC-B site.

Landscaping

As currently designed, the proposed landscaping of the ICC-B site includes multiple trees near the pedestrian and vehicular site access points near Sangamore Road, with additional trees, shrubs, and ornamental plantings primarily located adjacent to other pathways and roadways, and along the eastern edge of the garage. The remainder of the site within the Limit of Disturbance will be turf for both ease of security and maintenance. The site will be graded and the pathways aligned to provide accessible paths between all buildings and functional areas on the site. Areas outside the Limit of Disturbance will remain in their existing state—in particular the forested areas to both the north and west.

On April 9, 2012 the NPS provided a local planting guide to the USACE for guidance on appropriate native plants to use within the ICC-B site's landscape. The USACE has incorporated the use of multiple native species trees and plantings within the landscape as illustrated in the site plan below. These native species will be supplemented with additional ornamental trees and shrubs appropriate to, and used throughout, this local and climate.



Figure 17: Illustrative site plan.

A new chain-link site security fence will surround the North Campus on the west, north, and east sides and tie into the existing security fencing for the South Campus. Landscaping for the area of the North Campus along Sangamore Road will be finalized in conjunction with site landscaping for the South Campus (following construction of the final alignment of the site access road from Sangamore Road, as planned in Phase 2).

Due to the requirements of the USACE's design-build contract, the specific design and placement of several smaller site elements, including site furniture, site security (bollards, barriers, etc.) and site lighting, has not yet been finished. The design details of these elements will be provided to NCPC for review in the near future. In addition, the trees illustrated to west and south of the garage in the above illustrative site plan do not represent the final number and placement of trees in this location. Following construction of the garage and final grading the site in these areas, the USACE and its landscape design team will identify the specific number of trees and their placement within these areas and in conjunction with the existing trees on the slopes to the west and south to best maximize screening of the garage from views both west and south.

II. PROJECT ANALYSIS/CONFORMANCE

Executive Summary

The uses, sizes, and locations of the North Campus elements, including the parking structure, the vehicle entrance from Sangamore Road, the Vehicle Inspection Station, the Visitor Control Center and associated parking lot, were examined in detail during the Commission's review of the Intelligence Community Campus—Bethesda master plan, and the current submission for these elements conforms to the master plan. In addition, the USACE has adequately addressed the Commission's multiple notes, requests and requirements that were included with the master plan approval. However due to the requirements of the USACE's design-build contract, the specific design and placement of several smaller site elements has not yet been finished / provided to NCPC for review. As such, staff recommends that the Commission approve the preliminary and final site and building plans for Phase 1 (North Campus) of the ICC-B with the exception of the final site development plans for the landscape/hardscape, furniture, site security (bollards, barriers, etc.) and site lighting and delegate to the Executive Director approval of the final site development plans for these elements when they are provided to NCPC.

<u>Analysis</u>

On February 2, 2012 the Commission took action to approve the master plan; however this approval contained multiple notes, requests and requirements. The following outlines these notes, requests elements of the Commission action (listed as A-B) and describes how the applicant is meeting those requests / requirements within this Phase 1 (North Campus) submission.

- A. Notes that the Applicant has committed to:
 - Submit landscape design plans for each project phase to the National Park Service to ensure compatibility with the adjacent National Park.

The USACE continues to have dialogue through meetings and emails with the NPS. Of particular interest, on April 9, 2012 the NPS provided the applicant with a list of acceptable vegetation species and the applicant has used this to guide its landscaping plan (incorporating NPS recommended species into the plan). On May 24, 2012 the USACE provided the NPS with a copy of the landscape plan for the North Campus.

• Submit building and landscape design plans for each project phase to the Maryland-National Capital Park and Planning Commission (MNCPPC) for review of massing, articulation and materials of buildings, landscape design, and screening.

The applicant continues to have dialogue through meetings and emails with the MNCPPC. In particular, on March 30, 2012 the USACE reviewed the evolution of the site design with MNCPPC staff at the MNCPPC office. On May 24, 2012 the USACE provided the MNCPPC with a copy of the building and landscape plans for the North Campus.

• Participate in a Joint Traffic Committee with representatives from the Community and the Montgomery County Department of Transportation to monitor, analyze, and evaluate traffic congestion and pedestrian safety related issues.

The Joint Traffic committee has begun to meet, and includes representatives from the neighborhood, DIA, and Montgomery County Department of Transportation.

B. Notes that the Applicant is working with the U.S. Congress, Department of the Army, the National Geospatial-Intelligence Agency, Montgomery County, the National Park Service, and the Community to address possible remediation of offsite stormwater runoff erosion and sedimentation damage caused during the previous occupancy of the site.

The DIA continues to work towards achieving a solution to erosion remediation in the adjacent National Park with all involved parties, and recently facilitated a meeting of affected parties on May 2, 2012. This meeting included representatives from the NPS, Montgomery County, USACE, DIA, NGA, and Department of the Army. (USACE continues to serve as DIA's technical expert as these discussions progress.) At this meeting the parties agreed that any remediation within the National Park before improvements on the ICC-B site were put in place would only waste funds. As such, the parties agreed to a multi-year plan that includes addressing erosion issues at the north creek (the creek that runs along the north property boundary of the ICC-B site) after the North Campus improvements are complete. Following, when the South Campus improvements are complete, remediation within the National Park will be done to the eroded area created by the ICC-B's southern outfall area.

As experts, the NPS will plan out recommended remediation. As a first step, the USACE is providing the NPS with the storm water calculations for the North Campus (before and after improvements) and the NPS will make a judgment as to whether remediation is required for the eroded north creek.

In addition to the May 2, 2012 meeting, the USACE and DIA met with community leaders on May 11, 2012 at the site, and further with staff, Montgomery County, and the community leaders at the site on May 23, 2012 to further discuss the storm water issue and associated remediation of the off-site erosion damage.

- C. Requests that the Applicant submit the following information along with its request for Commission review of Phase 1 / North Campus (parking garage, Entry Control Facility, and Visitor Control Center):
 - An updated Site Development Guide that reflects all of the changes made to the master plan since the Commission's December 2011 meeting.

The USACE has provided staff with an updated SDG, dated April 16, 2012. The USACE has also placed the document on its Miscellaneous Public Notices section of the Baltimore District's webpage for public consumption.

• An amended traffic impact study and Transportation Management Plan that reflect the reduction of onsite parking to 1,825 total spaces.

The applicant has provided an updated TMP, dated April 16, 2012. The USACE has also placed the document on its Miscellaneous Public Notices section of the Baltimore District's webpage for public consumption.

• Information demonstrating compliance with the Maryland Department of the Environment's local stormwater requirements and the federal requirements under Section 438 of the Energy Independence and Security Act (EISA).

The applicant has previously received MDE erosion and sediment and storm water management permits for the initial design in January 2012. Subsequently the applicant has received its erosion and sediment permit for the revised scheme for the North Campus (May 2012). The applicant is currently continuing dialogue with the MDE and submitting documentation for MDE approval of its storm water management plan for the North Campus. USACE has reviewed its storm water management plan (as discussed above) with staff, Montgomery County, and community leaders at a meeting at the site on May 23, 2012. The USACE states that the project is compliant with EO 13514 and EISA Section 438 and has provided to staff supporting documentation prior to the Commission's February 2012 review of the master plan.

• A copy of the signed Letter of Commitment from the Defense Intelligence Agency to the community.

The USACE provided this letter to staff prior to the Commission's February 2012 review of the master plan. A copy of the letter is also attached as an appendix to the updated master plan.

- D. Requests the applicant set the following targets:
 - Limit deforestation on the site to no more than 0.2 acres.

The USACE has limited deforestation to 0.45 acres. On April 20, 2012, the USACE invited the community onto the North Campus with the purpose of identifying the Limit of Disturbance (LOD) as reflected in the now approved MDE Sediment and Erosion control permit plan set. The entire LOD was flagged by surveyors and identified to the community. Trimming and removal of specific trees associated with the 0.45 acres of deforestation were discussed with the community.

• Design storm water management facilities with the goal of treating and retaining 100% of stormwater for a 25-year storm.

There appears to be general agreement among the USACE, DIA, community and staff that site and budgetary constraints make the design standard of treating and retaining 100 percent of storm water for a 25-year storm unfeasible. However, the applicant has designed a storm water detention system that will exceed the 10year storm requirements of MDE and that will filter and control the rate of flow of detained storm water from the site (as described above the North Campus storm water management plan uses both a bio-retention pond and engineered filters to treat storm water released from the site).

The complete North Campus storm water management design is currently scheduled to be submitted to MDE in late June 2012. Though not yet completely engineered, the summary and intent of this plan is displayed in the Storm Water Management summary drawing (above). This drawing represents a continuous progression from the intent stated during the April 2012 informational briefing provided to the Commission. The current design accounts for treatment of water from all areas of the North Campus. To do this, the proposed detention structure north of the garage has been significantly increased in capacity over the original permit design and the proposed treatment pond in the southeast corner of the garage exceeds the size and treatment capacity that would otherwise be required by MDE. (Through further engineering and discussions with MDE, the proposed treatment pond has recently been reduced in size, while still at a desired capacity, that may allow for an in-the-field reduction of the number of trees affected by construction.)

• Encourages the Applicant to continue its close coordination with NCPC and all other interested and affected stakeholders during design development of individual site and building plans, and to maximize onsite stormwater retention and reuse to the extent technically feasible given the sensitive nature of the adjacent National Parkland to the west.

As noted above the applicant has continued dialogue with all affected parties. NCPC is in receipt of notice of conditional support for the project from nine of nine neighboring citizens associations (see Appendix). The conditions include continuation of the current transparent public participation process and acceptance of solutions to storm water issues.

Comprehensive Plan for the National Capital

The proposed master plan for the Intelligence Community Campus-Bethesda is not inconsistent with the Federal Elements of the Comprehensive Plan for the National Capital, and particularly conforms to numerous policies of the Federal Workplace Element. In particular, the redevelopment of the site allows the federal government to utilize available federally owned land and space before purchasing or leasing additional land or building space, a key policy of the Federal Workplace Element. Considering the modernization, repair, and rehabilitation of existing federally owned facilities for federal workplaces, before developing new facilities, is another key policy within the Element that this proposal supports. The redevelopment of the site also allows the federal government to use this long-held federal facility, supporting local businesses, and contributing to the regional economy, which are also important policies set forth within the Federal Workplace Element.

In addition, the master plan conforms to the travel demand management policies of the Transportation Element within the Comprehensive Plan with a Transportation Management Plan that includes commitments for encouraging the use of public transportation, and limitations on employee parking to meet the recommended Comprehensive Plan ratio of 1:1.5-2 for suburban areas beyond 2,000 feet of Metrorail. The proposal also meets the Comprehensive Plan policy that encourages federal agencies to utilize structured parking in the interest of efficient land use and good urban design.

Relevant Federal Facility Master Plan

The uses, sizes, and locations of the North Campus elements, including the parking structure, the vehicle entrance from Sangamore Road, the Vehicle Inspection Station, the Visitor Control Center and associated parking lot, were examined in detail during the Commission's review of the Intelligence Community Campus—Bethesda master plan, and the current submission for

these elements conforms to the master plan. The master plan was approved by the Commission on February 2, 2012.

National Environmental Policy Act (NEPA)

In compliance with the National Environmental Policy Act (NEPA), the Army Corps of Engineers reviewed the master plan for the ICC-B within an Environmental Assessment, and A Finding of No Significant Impact (FONSI) was completed based on this EA on September 8, 2011. Given the project's location in Bethesda, Montgomery County, Maryland, the Commission does not have independent responsibilities under NEPA.

National Historic Preservation Act (NHPA)

The Maryland Historical Trust, as Maryland State Historic Preservation Office (SHPO), has reviewed the master plan for the ICC-B and found that implementation of the ICC-B project will have an adverse effect upon Erskine Hall, which is eligible for listing in the National Register Historic District. The Defense Intelligence Agency and the SHPO have entered into a Memorandum of Agreement (dated October 14, 2011) that will ensure that the project is implemented in accordance with certain stipulations that take into account the effect of the undertaking on historic properties. These stipulations include the retention of Erskine, Maury, and Roberdeau Halls (excluding the brick facades) and retention of the Flagpole and Globe; amending the Maryland Inventory of Historic Properties Form for the site to include the information gathered in the Determination of Eligibility for Emory, Abert, Roberdeau, and Maury Halls; and the development and implementation of a landscape plan to maintain the integrity of the Flagpole and Globe Memorial's setting.

Given the project's location in Bethesda, Montgomery County, Maryland, the Commission does not have independent responsibilities under NHPA.

III. CONSULTATION

Coordination with local agencies

The master plan for the ICC-B was referred to affected agencies through the Maryland State Clearinghouse on July 15, 2011 and distributed to the Maryland Departments of Business and Economic Development, Housing and Community Development, Transportation, the Environment, Natural Resources, the Maryland Military Department, Montgomery County, the Maryland-National Capital Park and Planning Commission in Montgomery County, and the Maryland Department of Planning, including the Maryland Historical Trust.

On October 3, 2011 the Clearinghouse provided comments from the Maryland Department of the Environment, the Maryland-National Capital Park and Planning Commission in Montgomery County, and the Maryland Historical Trust. These were attached within the appendix of the master plan Executive Director's Recommendation report (NCPC File No: MP7257).

IV. APPENDIX

From:	harold pfohl
To:	Provancha, Bradley; Young, Deborah B.; Dettman, Shane; Greenwald, Elyse; Tregoning, Harriet; Hinkle, Jeff;
	Denis, Howard A.; Wright, Mina; May, Peter; Bryant, Preston; Miller, Robert E.; Kass, Jonathan
Cc:	"Manzelmann, James"
Subject:	ICC-B Approval of email to Adm. Manzelmann re communities" support of the ICCB plan by Ft. Sumner Citizens
	Assn., and the Brookes & Locust Lane Civic Assn.
Date:	Monday, April 30, 2012 4:53:02 PM
Attachments:	Re Conditional Approval of ICC-B Phase 1 Plan by Affected Communities.msg
	Et. Sumner approval ICC-B e-mail.msg

All:

Per the attached, now nine of nine neighboring citizens associations have concurred with the email sent this past Sat., 4/28, to Adm. Manzelmann providing conditional support of the ICCB Phase 1 master plan. The email to Adm. Manzelmann is reproduced below and was endorsed by seven of our nine affected citizens associations. The other two have endorsed it today, per the attached emails.

We are most appreciative of the support that NCPC has provided encouraging joint DoD/community work. While some work remains, the resultant plan as it stands is a vast improvement over the starting point from last fall. We look forward to your continuing support and oversight.

Thank you,

Harold Pfohl, President Glen Echo Heights Citizens Assn.

* * * * * * *

 From:
 Communities Affected by the Redevelopment of the NGA Site for the ICC-B

 To:
 Adm. James Manzelmann, Deputy Director, Defense Intelligence Agency

We appreciate the considerable effort that you have put into working with our neighborhoods to create a campus for the Intelligence Community on the old National Geospatial-Intelligence Agency (NGA) site that fits well at the edge of the Potomac River Gorge and next door to our communities. The current plan is a vast improvement over the starting point expressed in the late-2010 draft Environmental Assessment and the draft Site Master Plan that was presented to us this past October.

The basic plan shown in the April 5, 2012, Community Brief – as updated by your most recent presentation and our continued engagement – is satisfactory to us. We are encouraged by the reduction in deforestation to less than 0.5 acres from the original 3+ acres, although we, like NCPC, were looking for less tree loss. We also all understand that there is some additional tweaking to be done, specifically regarding designing the northwest outfall to minimize tree loss. We also still have not received and studied the

existing and planned stormwater treatment and discharge numbers and the revised stormwater permit submission to MDE, so some uncertainty remains regarding the plans for stormwater management. However, we now have a transparent process in place for the ICC-B team and the community to work together to resolve that uncertainty. A sound process also is in place for DoD to work with the National Park Service to seek funds for remediating damage caused to the national parks during NGA's occupancy.

In light of this progress, we are happy to notify the National Capitol Planning Commission of our conditional satisfaction with this plan, subject to continuation of the current transparent process and acceptance of solutions to these remaining issues by our communities and NCPC.

Your engagement with our communities has been most beneficial to all parties concerned! It also provides a roadmap for beneficial future cooperation between the federal government and affected communities. We are looking forward to continuing to work with you and the DIA.

Sincerely,

Harry Pfohl, President Glen Echo Heights Citizens Association (GEHCA)

Steve Salop, Co-Chair Wapakoneta Road Subcommittee, GEHCA

David Berg, Board Member The Civic League of Brookmont and Vicinity

Brad Northrup, Board Member The Civic League of Brookmont and Vicinity

Laurene Sherlock, President Sumner Square Condo Assn.

Laird Patterson, Treasurer Sumner Square Condo Assn.

Donal O'Connell Co-President Sumner Citizens Assn.

Suzanne Dater, Representative

The Sangamore Court Town Homes

John Harbeson, Board Member Sumner Village Community Assn.

Burton Gray, President Cabin John Citizens Association



The Ft. Sumner Citizens Association would like to add it's approval of the e-mail sent on 4/28/2012 at 1:57:18 P.M.

From: Communities Affected by the Redevelopment of the NGA Site for the ICC-B

To: Adm. James Manzelmann, Deputy Director, Defense Intelligence Agency

 From:
 Tom Waldvogel

 To:
 harold pfohl

 Subject:
 Re: Conditional Approval of ICC-B Phase 1 Plan by Affected Communities

 Date:
 Monday, April 30, 2012 1:48:26 PM

Harold,

On behalf of the Brookes & Locust Lane Civic Assn, we fully support your efforts and thank you for the time you have put forth.

Thank you...Tom Waldvogel