



Executive Director's Recommendation

Commission Meeting: February 2, 2012

PROJECT**Intelligence Community Campus - Bethesda Master Plan**

4600 Sangamore Road
Bethesda, Montgomery County, Maryland

NCPC FILE NUMBER

MP7257

NCPC MAP FILE NUMBER

72.00(05.00)43308

SUBMITTED BY

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

APPLICANT'S REQUEST

Approval of final master plan

PROPOSED ACTION

Approve with conditions and
comments

REVIEW AUTHORITY

Advisory
per 40 U.S.C. § 8722(b)(1)

PROJECT SUMMARY

The United States Army Corps of Engineers, on behalf of the Defense Intelligence Agency, has submitted a master plan to redevelop the federal facility at 4600 Sangamore Road in Bethesda, Maryland. The facility was recently vacated by the National Geospatial-Intelligence Agency, which moved to its new headquarters at Fort Belvoir's North Area, in Springfield, Virginia, as a result of the 2005 Base Realignment and Closure. The master plan provides a vision and framework to transform the facility into a secure campus supporting U.S. Intelligence Community¹ activities. While the master plan retains most of the existing on-site buildings, the plan proposes to significantly alter the site with: additions and new façade treatments to the existing buildings; the construction of a new 1,800 vehicle space parking garage, Entry Control Facility and Visitor Control Center; and extensive landscaping to replace the site's existing and pervasive surface parking. The master plan accommodates a maximum employee population of 3,000 at the site, with build out to occur in two phases over the next four years. The installation is being designed to meet LEED Silver certification requirements for the site as a whole, and a "net-zero" energy efficiency and LEED Gold certification requirements for the Visitor Control Center.

KEY INFORMATION

- At its meeting on December 1, 2011 the Commission deferred action on the 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. Since then, the applicant has:

¹ The U.S. Intelligence Community (IC) 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/>

- Confirmed with the Director of National Intelligence the program requirement to include parking within the site's secure perimeter; the tenant program requires identity checks for personal vehicles and searches for commercial vehicles.
 - Studied alternative physical configurations and site layouts for the parking garage.
 - Committed to a reduction in the total number of on-site parking from 2,240 to 1,825.
 - Identified a preferred physical configuration and site design for the garage that includes a reduction in the garage's overall footprint of approximately 20% and a maximum of 1,800 parking spaces.
- In addition, the Army Corps of Engineers and the Defense Intelligence Agency have continued dialogue with the community and are developing a Letter of Commitment designed to address and resolve the concerns of the community regarding adverse impacts of the project.

RECOMMENDATION

Approves the master plan for the Intelligence Community Campus-Bethesda, Montgomery County, Maryland, for use by the Commission as a guide for future reviews of individual site and building projects at the installation.

Commends the Applicant for its plan to reuse and modernize an existing federally owned facility in a manner that acknowledges the facility's historic significance and substantially improves the environmental sustainability of the site.

Commends the Applicant and the Community for their extensive coordination efforts since the Commission's December 2011 meeting to resolve issues related to site design, transportation and parking, visual impacts, deforestation, and stormwater management.

Notes that the final master plan:

- Includes a maximum site capacity of 3,000 employees.
- Includes a total onsite parking capacity of 1,825 spaces with a total number of employee parking spaces of 1560, which equates to a parking ratio of one space for every 1.92 employees.
- Includes a parking garage that is approximately 248 feet in width and 385 feet in length and has a maximum capacity of 1,800 parking spaces.
- Does not include a provision for a helipad.
- Includes reestablishment of the four-way, stop sign controlled intersection at Sangamore Road and Sentinel Drive as part of the Phase 2 build out of the site.
- Minimizes required tree clearing along the west side of the site to less than 0.75 acres

and preserves all existing onsite specimen trees.

- Includes a landscaped, 10 – 15 foot reverse berm along the west side of the site, and additional berms and vegetated buffers along the north and east sides of the site, to help screen views of the garage and reduce the impacts of vehicle lights on the Potomac Palisades, adjacent National Park Service property, and surrounding residential neighborhoods.
- Includes provisions to remediate onsite stormwater runoff erosion and sedimentation damage caused during the previous occupancy of the site.

Notes that the Commission will consider the Staff Recommendation and Commission Action as the Intelligence Community Campus-Bethesda Master Plan until the Applicant submits an updated Site Development Guide.

Notes that any changes to the master plan, including but not limited to changes in the amount of onsite parking and proposals for additional building construction, are required to be submitted to the Commission for review in accordance with the National Capital Planning Act and NCPC's Submission Guidelines.

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

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.

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

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

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.

PROJECT REVIEW TIMELINE

Previous actions	December 1, 2011 – Deferred action on the Master Plan for the Intelligence Community Campus-Bethesda, Montgomery County, Maryland, 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.
Remaining actions	<ul style="list-style-type: none">– Preliminary and final approval of Phase 1 / North Campus (includes new parking garage, entry control facility, and visitor control facility)– Preliminary and final approval of Phase 2 / South Campus (includes redevelopment of, and new construction for, site office facilities)

Prepared by Jeff Hinkle on January 30, 2012

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I. PROJECT DESCRIPTION

SITE

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 proposing the reuse of the Sangamore Road property for a secure campus, the Intelligence Community Campus—Bethesda (ICC-B), supporting numerous Intelligence Community activities. The Intelligence Community currently has operations at the site with approximately 400 employees.

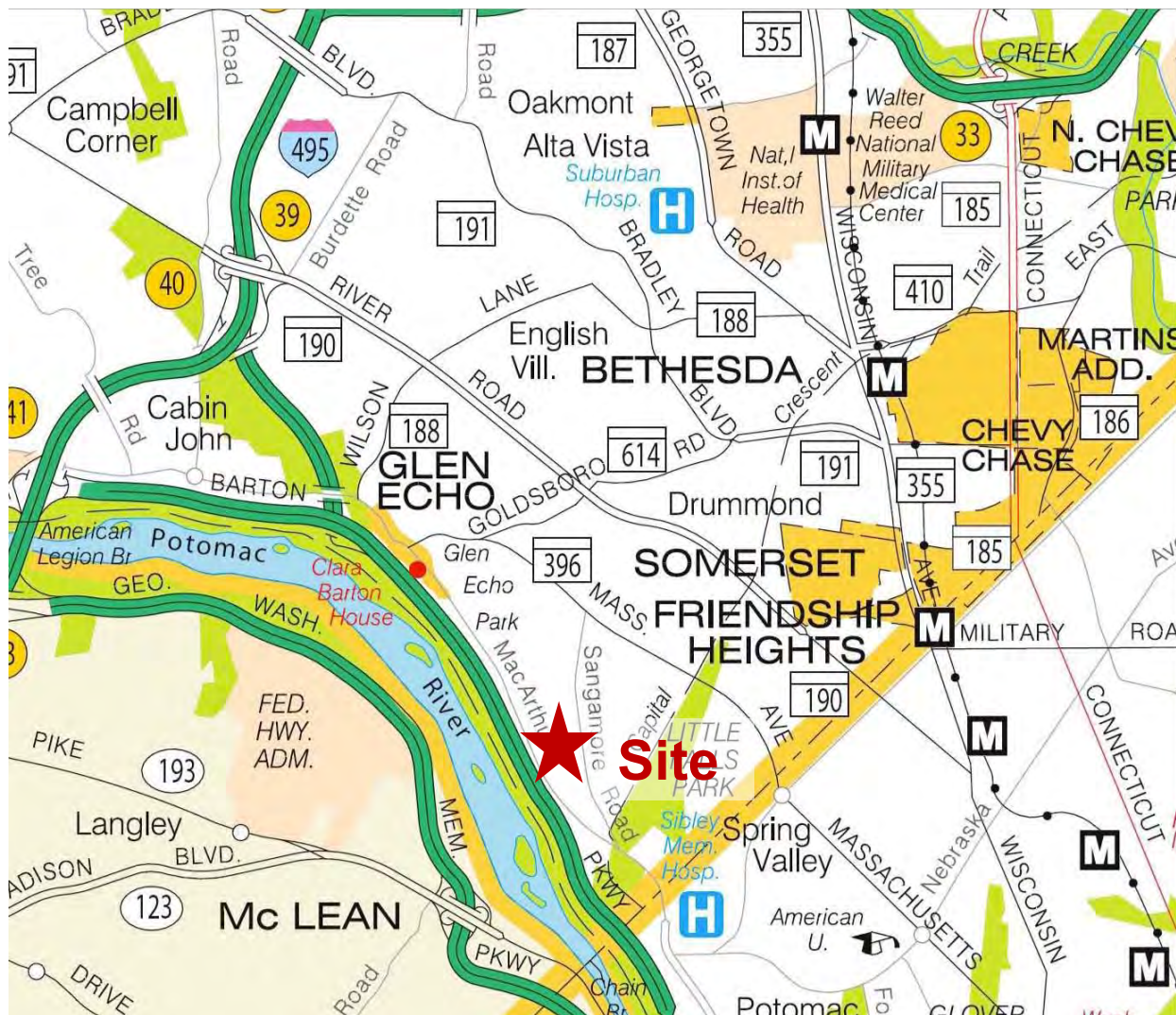


Figure 1: Site location.

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

² See Appendix C: Letter from the National Park Service to the USACE, submitted on January 10, 2012.

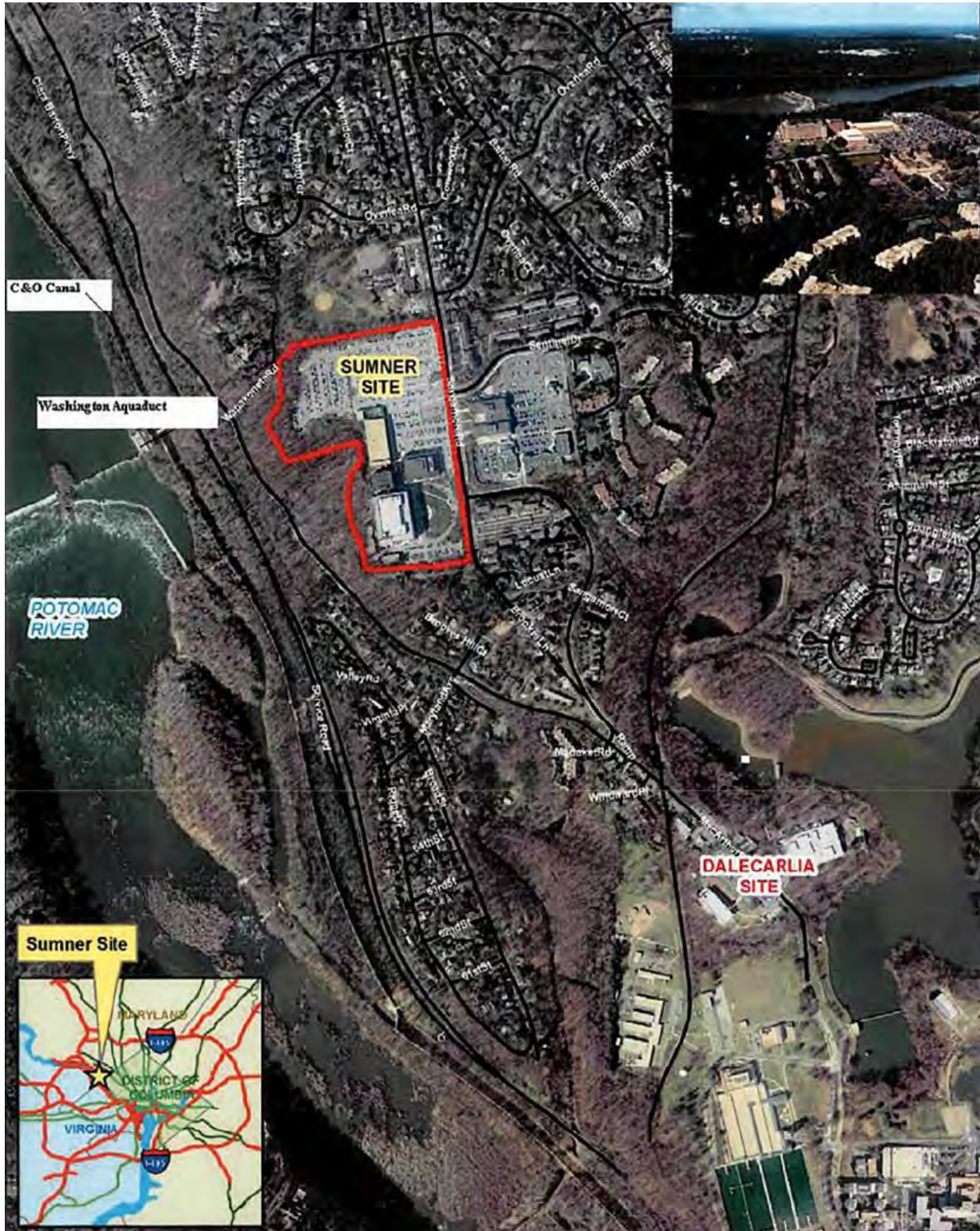


Figure 2: Aerial of the site and surrounding community.

As noted above, the site was most recently used as the headquarters of the NGA, which evolved in part from the Army Map Service.

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).

Proposal

The Commission previously reviewed the master plan at its December 1, 2011 meeting. At that time, the Commission deferred action on the ICC-B master plan and required the USACE to evaluate alternatives to the size, location and capacity of the parking garage, including the exclusion of parking from the secured perimeter.

Since that time, the USACE has worked with staff, the community, and other stakeholders to address issues noted by both the Commission and the community. The following describes the original master plan proposal and how it has evolved. In particular, below is:

- A. A general description of the master plan with the original site plan
- B. A description of the alternative site plan presented to NCPC at the December 1, 2011 meeting
- C. A description of the current proposal

A. Master plan with original site plan

While the overall site plan for the ICC-B Campus has evolved substantially in response to Commission and community input, the overall intent of the project remains the same. As stated previously, the proposal is to redevelop the site into a secure campus supporting a wide range of Intelligence Community activities. The master plan (formally titled the Site Development Guide) is designed to accommodate a maximum 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).



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).

One goal of the project is to bring the installation into compliance with the latest version of the Anti-Terrorism/Force Protection (AT/FP) requirements for Department of Defense buildings. These requirements include minimum anti-terrorism standards for building standoff distances, parking and roadway controls, and architectural design and materials for both new construction and existing buildings undergoing modernization. The removal of Emory Hall and Abert Hall is proposed, in part, to comply with AT/FP setback requirements. In addition, all new buildings will comply with the AT/FP standoff requirements for both the controlled site perimeter and vehicular parking and circulation drives.

Parking at the site will increase, and was initially proposed to be 2,240 spaces. This included 2,000 spaces assigned to the 3,000 employees, with the remaining 240 to be available for fleet parking, visitors, and carpool/vanpools. The 2,000 spaces for employees allowed for a parking ratio of one space per 1.5 employees, which meets NCPC's recommended goal of one space for every 1.5 – 2.0 employees for suburban installations located beyond 2,000 feet from a metro stations. Since the initial proposal, the total number of onsite parking spaces has been reduced as described later in this report.

As initially proposed, the primary vehicle access point into the installation was planned to be relocated from the intersection of Sangamore Road and Sentinel Drive to the northeast corner of the site. At this location, privately owned and commercial vehicles were to access the installation via a new road and gate (Entry Control Facilities, or ECFs). The new access road was designed to provide on-site queuing space for approximately 40 vehicles, eliminating current entrance queuing on Sangamore Road.

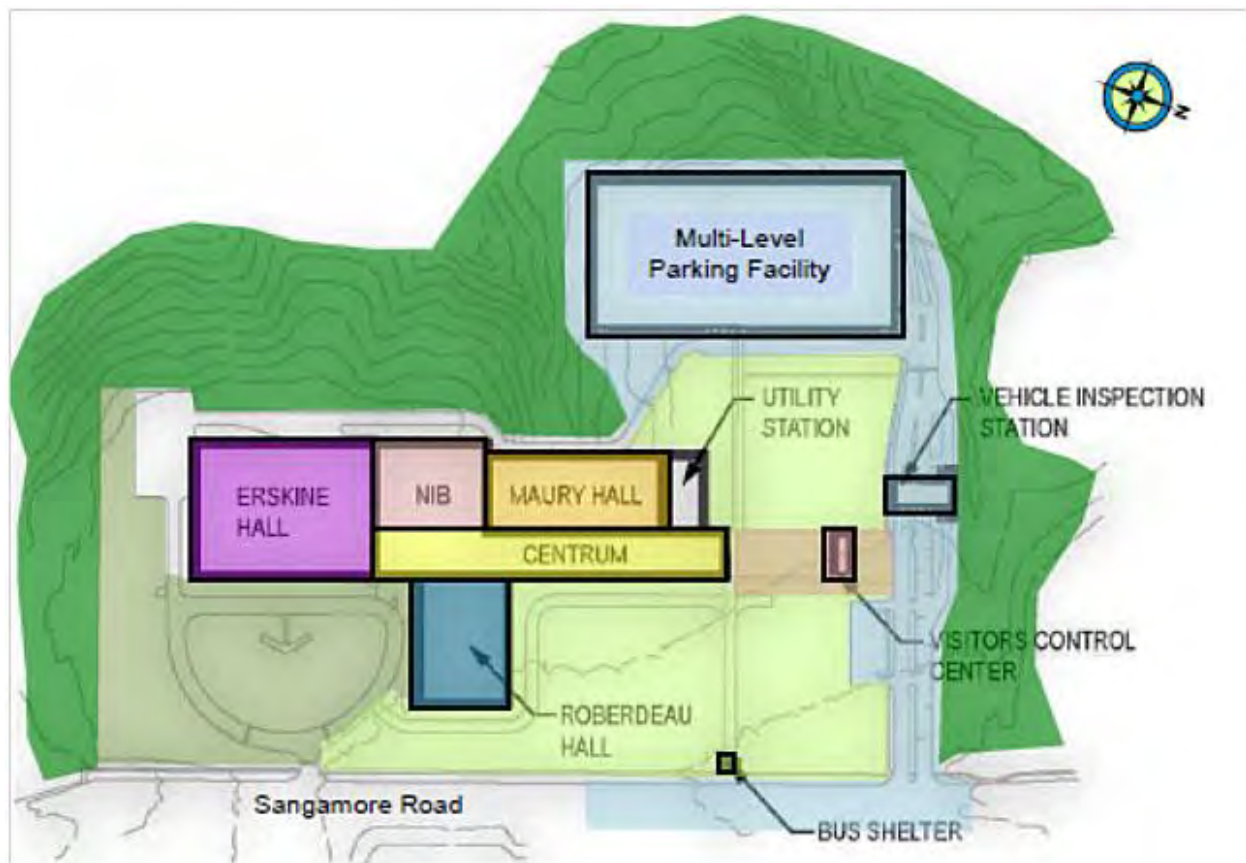


Figure 6: Generalized site plan as originally proposed for the installation (Erskine, Maury, and Roberdeau Halls are existing structures; the New Infill Building, or NIB, Centrum, parking facility, Entry Control Facility, Visitors Control Center, and bus shelter are proposed structures).

Within the initial proposal, the parking garage was sited in the northwest corner of the installation to maximize open and developable space and minimize its visual presence from Sangamore Road. The garage is proposed to be six levels, with two levels below grade and four above. The design intent is to use the existing topography of the site to allow the two below-

grade levels to be open in locations, which reduces the need to install forced air ventilation and sprinkler systems for fire suppression within the garage.

Appropriate active and passive vehicle barriers provide the required protection for the installation and for the gate users. The Entry Control Facility is designed to meet the AT/FP requirements. Delivery vehicles to the site will be processed through a Materials Inspection Center, which will be attached to the north side of the ECFs. This center will screen materials delivered to the site and will include areas for administrative functions, K-9 support, restrooms, and related storage.

Pedestrian paths will connect the parking garage, the Visitor Control Center, and Sangamore Road to the new building entry. A bus shelter at Sangamore Road will also double as a pedestrian access gate into the campus. All visitors to the ICC-B will be processed through the Visitor Control Center, which will include areas for a guard post, interview room, administrative functions, restrooms, and related storage.

Landscaped areas along Sangamore Road, made possible with the elimination of surface parking, will help to screen the mass of the building and will double as groundwater recharge zones. The existing historic vehicular ellipse and monumental flag stand within the southern area of the site will be preserved. An existing gate in this location, and the vehicular ellipse, will only be used to provide VIP access to the installation.

Similar to existing conditions, a new 8-foot-tall fence is planned around the perimeter of the site. The fence is proposed to be chain link topped with one foot of barbed wire for the north, west, and south sides of the installation. An ornamental metal fence with anti-climb pickets is proposed for the east side (along Sangamore Road). A clear zone free of obstructions will be provided on either side of the fence, where possible. The exact location of the fence and clear zones will be finalized as individual building projects and landscaping plans are developed for the installation.

To implement the master plan, extensive demolition will be required for buildings and site infrastructure. Building demolition will include Abert Hall, Emory Hall, and the Visitor Control Center. Site infrastructure demolition will include all existing site vehicular entrances (except for the southern-most entrance) and existing surface parking and associated access drives. Underground utility and storm drainage infrastructure demolition will be conducted within the surface parking area.

Project phasing

Redevelopment of the installation will be done through design/build contracts and is divided into Phases 1 and 2 as described below. As noted above, the DIA currently has approximately 400 employees working at the site. During construction, the site will continue to be in operation, with the site population gradually increasing towards the planned 2016 full occupancy of 3,000.

Phase 1 / North Campus:

The first phase to redevelop the installation includes construction of the new parking garage, Entry Control Facility, Visitor's Control Center and the access road (elements identified as the North Campus in the following figure). A construction period of approximately 15 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.

Phase 2 / South Campus:

As Phase 1 of construction gets underway, design of Phase 2 (the 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, with construction planned to be fully complete near the end of 2016.

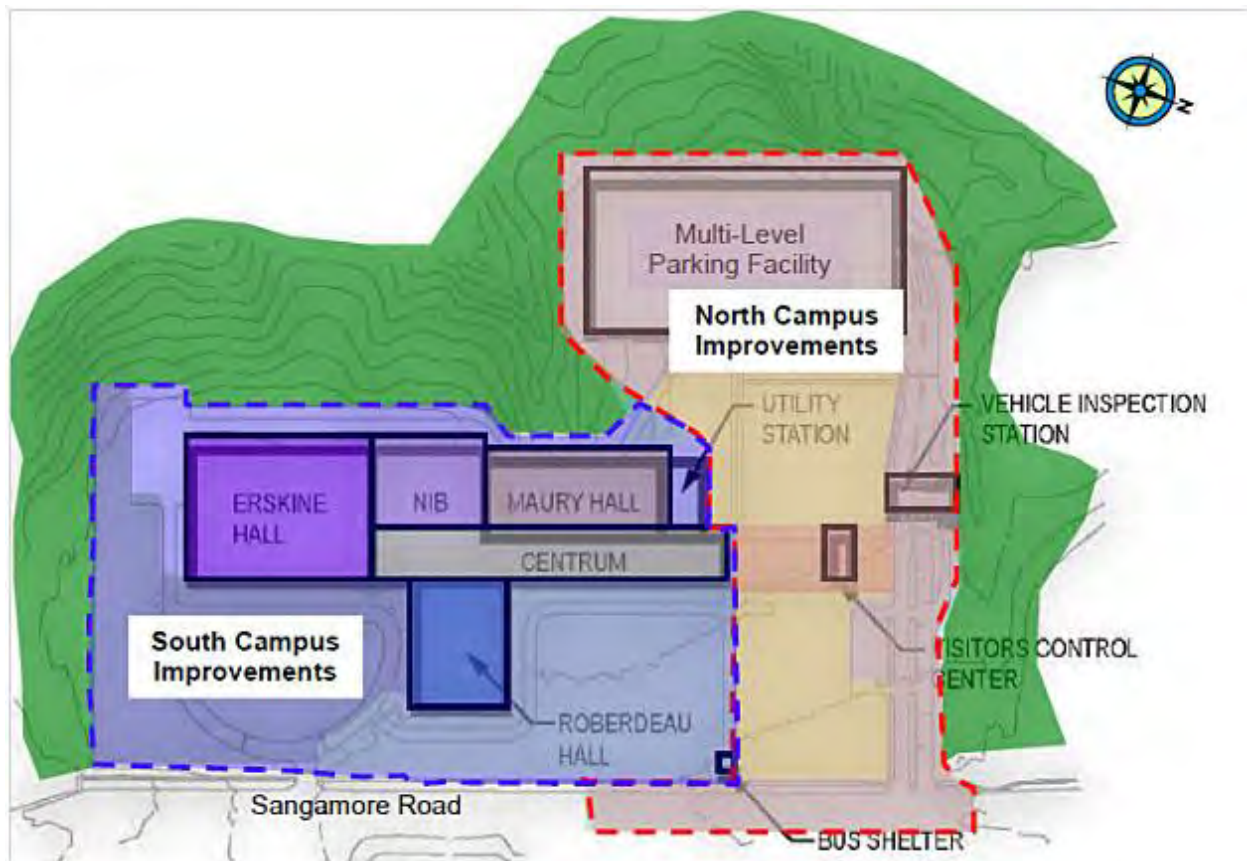


Figure 7: Phasing map—the North Campus will be built in Phase 1, followed by the South Campus in Phase 2.

B. December 1, 2011 alternate site plan

In advance of the December 1, 2011 Commission meeting, the USACE was actively engaged in conversations with NPS, Montgomery County, and the community to address outstanding questions and concerns regarding the proposed access road and parking garage. Specifically, and as expressed during public testimony, NPS and members of the community had continuing questions regarding the visual impacts of the parking garage on the Potomac Palisades and residential areas to the north of the site, and the potential impacts of the proposed location of the access road on traffic flow along Sangamore Road and access to nearby residential properties. The outcome of these conversations resulted in the USACE presenting to the

Commission revisions to the siting, design, and alignment of these two components of the project at the December 1, 2011 meeting.

Regarding the garage, USACE presented an alternative that decreased its physical footprint by approximately 8,000 gross square feet (or 6.2 percent) and reoriented it to reduce the amount of impacted wooded area—specifically along the northern and western boundaries of the site. USACE also worked to pull the property fence line in as close to the parking structure as possible and to minimize its impact on existing trees/wooded area by leaving portions of the site within the steeply-sloped forested area outside of the fence line.



Figure 8: December 1, 2011 site plan presented to the Commission by USACE. Compared to the orientation of the garage in the initial proposal (yellow above) and site plan, the orientation of the garage was shifted and its footprint was reduced to limit its impact on the existing trees (purple above).

In regards to the access road, after discussions with the Montgomery County Department of Transportation (MC-DOT), it was determined that the existing stop signs at Sangamore Road and Sentinel Drive would remain to control traffic and provide for pedestrian safety. Based on this condition, USACE conducted additional traffic analyses, and concluded that leaving the primary site entrance in its current location (across from Sentinel Drive) yields an optimal configuration for site traffic in relation to community vehicular movements. As such, the USACE

will construct for temporary use the previously proposed configuration for the site access road, at the northern edge of the site, during Phase I and use that entrance for construction vehicles and other site vehicular access during reconstruction of the site. During Phase II the USACE will then reconstruct the site access roadway as depicted in figure 9 and eliminate the temporary entrance (and landscape the area used for the temporary entrance).

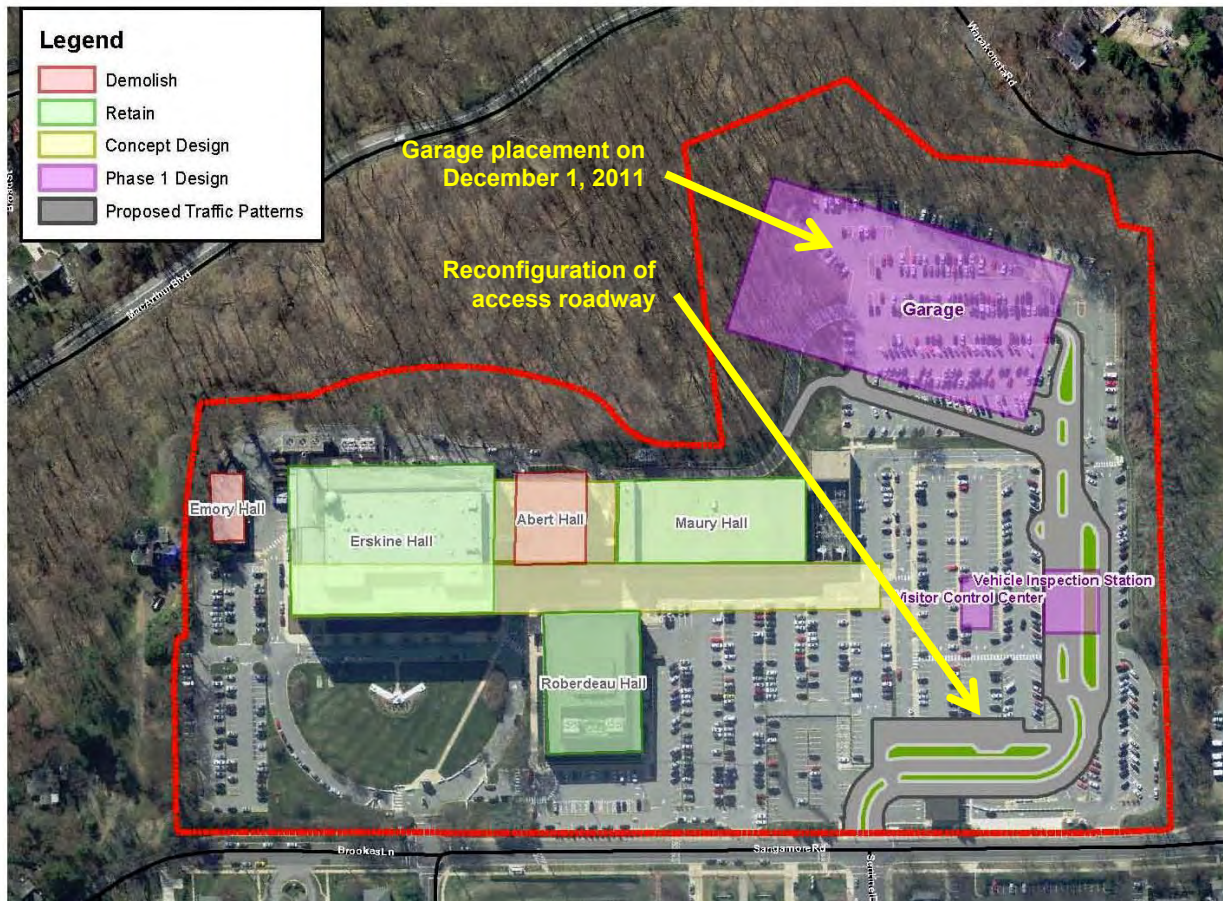


Figure 9: December 1, 2011 site plan presented to the Commission by USACE with revised access road. In addition to reducing the size and orientation of the garage, USACE studied a reconfiguration of the installation's access road that puts it back to form a four-way stop at Sangamore Road and Sentinel Drive.

C. Current proposal

In response to the Commission's December 1, 2011 action that directed the USACE to evaluate alternatives to the size, location and capacity of the parking garage, including the exclusion of parking from the secured perimeter, the USACE completed the following alternative analysis. This discussion is then followed by a description of the current project proposal.

Alternative analysis

The USACE confirmed with the DIA, their client agency, that secure parking for the facility is a mission requirement and that an I.D. check is required prior to parking on the installation (with the exception of the visitor lot, which is outside the Visitor Control Center). With this as a given criteria, the USACE studied a number of alternatives for placement of the garage within the site's secure perimeter and outside the required Anti-Terrorism/Force Protection (AT/FP) setback requirements for the installation's buildings. These alternatives included a mid-site placement of the garage, a northeast placement of the garage, and the current proposal for placement of the garage in the northwest corner of the site.

Of note for analyzing all three proposals is that the site slopes approximately 30' down from Sangamore Road west towards the Potomac River (from right to left in the following illustrations). One objective of the USACE in designing the garage is to use this topography to design an open garage, that is, a garage that does not require the installation of forced air ventilation and sprinkler systems for fire suppression. Of further note is that the garage is designed to have six levels, essentially four levels above grade and two levels below (using, as mentioned above, the site's topography to maintain some openness on the lower levels). Further burial of the garage at any of the alternative sites would require extensive expensive construction measures to blast and remove existing bedrock.

Mid-site and northeast garage placement alternatives

The mid-site and northeast garage placement alternatives, with the garage in the middle of the site and along the north border or, alternately at the northeast corner of the site, would in general:

- Place the top of the garage approximately 30 feet above the garage height of the December 1, 2011 proposal due to the slope of the site, which may make it more visible than the December 1, 2011 proposal when viewed from across the Potomac River valley but potentially less visually intrusive from areas such as MacArthur Boulevard and Wapakoneta Road. Placement of the garage at the mid-site may also make it more visible from Sangamore Road as well as the Sangamore Local Park and the Waldorf School immediately adjacent to the site at the north.
- Require the Entry Control Facility to be placed closer to Sangamore Road, reducing queuing space at the gate and potentially increasing traffic congestion on Sangamore Road. Within the mid-site alternative there also may not be sufficient room for the distances required for final denial barriers.
- Require the visitor parking lot and Visitor Control Center to be placed closer to Sangamore Road negatively impacting views onto the site.
- Provide additional open space towards the west (rear) side of the site but potentially reduce the ability to provide additional open space and screening at the north side of the site (adjacent to the Sangamore Local Park and Waldorf School)
- Potentially provide improved options for stormwater management over the December 1, 2011 proposal.
- Require some disturbance of underground bedrock.

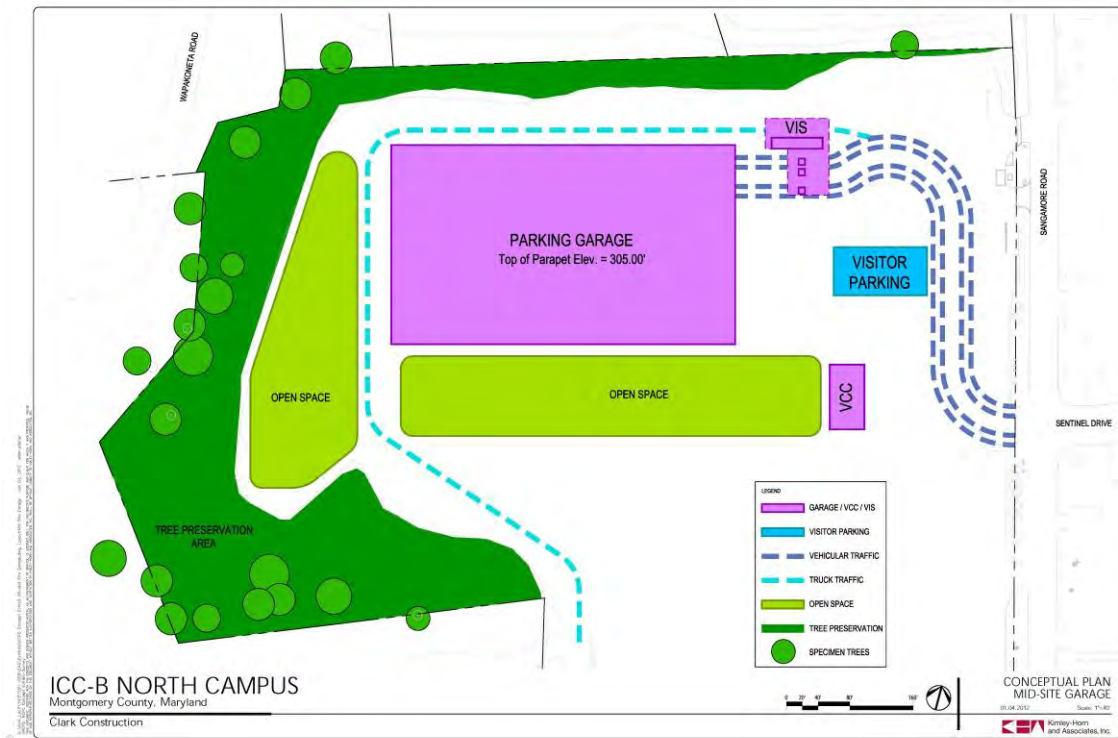


Figure 10: Mid-site garage placement alternative.

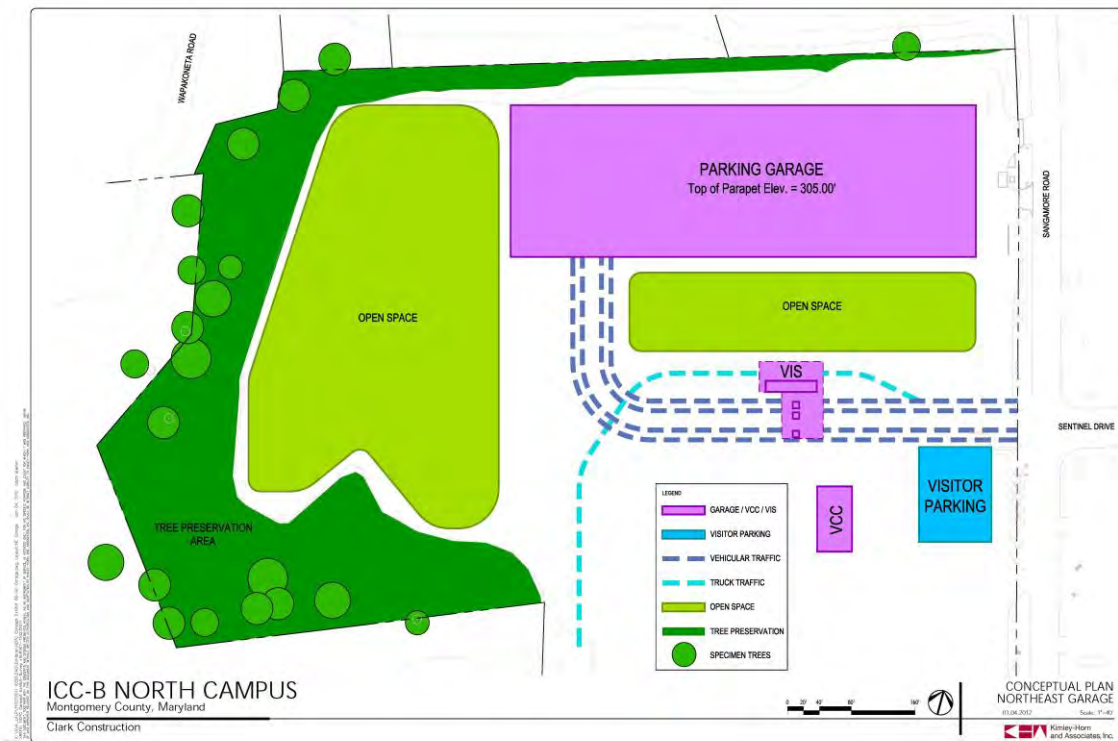


Figure 11: Northeast garage placement alternative.

Current (proposed) garage placement alternative

The current (proposed) garage placement alternative, with the garage in the northwest corner of the site, adjacent to the Potomac Palisades, would:

- Place the top of the garage at the lowest elevation of all the alternatives, which may make it less visible than the other alternatives when viewed from across the Potomac River valley and Sangamore Road (the top level of the garage will, in fact, be approximately 5 feet higher than the Sangamore Road elevation). In addition, this location places the garage in the location furthest from both the Sangamore Local Park and the Waldorf School immediately adjacent to the north. The location does, however, have the impact on views for the residents of Wapakoneta Road to the northeast.
- Allows the furthest distance for the Entry Control Facility from Sangamore Road, with the most space for queuing space at the gate and the least negative impact on views onto the site.
- Allows the Visitor Control Center to be placed the furthest distance and to have the least negative impact on views onto the site from Sangamore Road.
- Provides additional open space for screening at the north side of the site (adjacent to the Sangamore Local Park and Waldorf School).
- Does not require disturbance of underground bedrock.

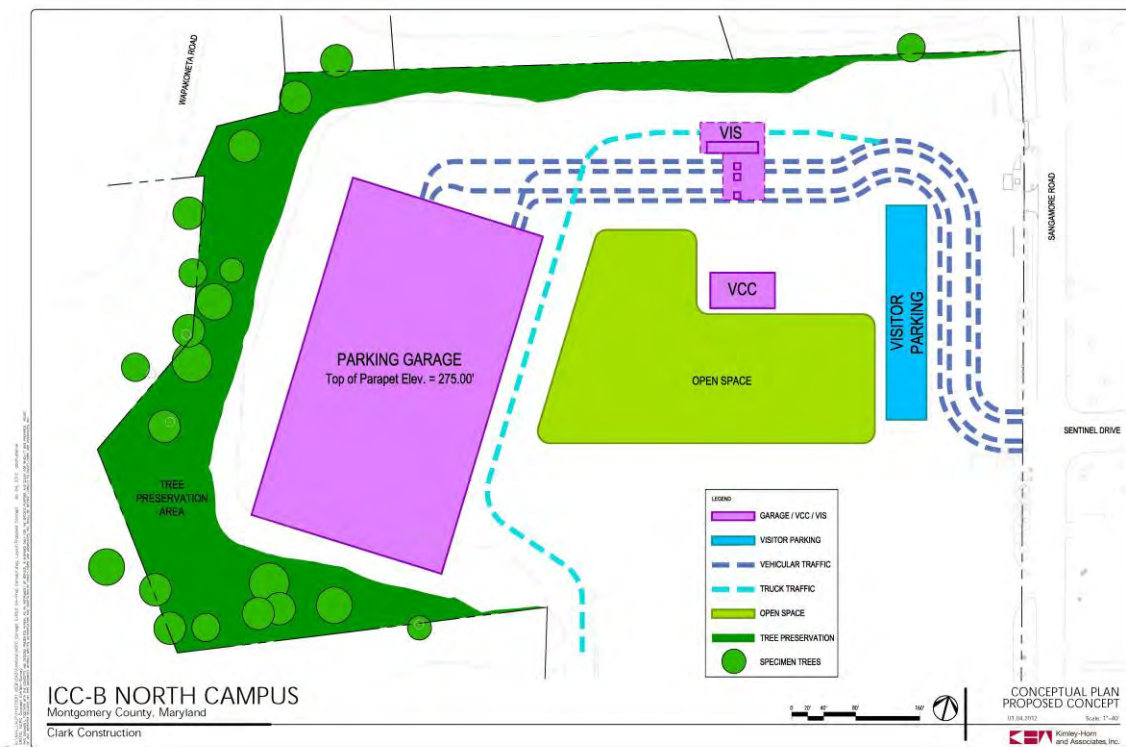


Figure 12: Current (proposed) garage placement alternative.



Figure 13: Illustration of current (proposed) garage in context (looking west). The top photo is the northeastern corner of the site today as viewed from across Sangamore Road. The bottom photo is the same view with the proposed garage at the rear of the site and the gate (Entry Control Facility) on the right midway between the garage and Sangamore Road, and the Visitor Control Center on the left midway between the garage and Sangamore Road. The bottom view shows the temporary entrance to be removed and landscaped at the end of Phase 2.

Current project proposal

The garage placement analysis confirmed that the current, proposed, garage placement, that which was presented on December 1, 2011, has the most benefits, in particular with respect to view onto the site from the Potomac River valley, Sangamore Road, the Sangamore Local Park, and Waldorf School).

Since this placement was first presented to the Commission at its December 1, 2011 meeting, however, the USACE has made a number of refinements to the project proposal, including a reduction in the number of proposed parking spaces onsite and in the garage, a reduction in the footprint of the parking garage, an adjustment in the location of the garage, a reduction in the amount of existing forested area to be impacted, a reduction in view-shed impacts from the garage, and a revised site entrance. These refinements are described below.

The following figure illustrates the progression of the garage design. It includes a representation of the proposed size and location in 1) the original concept design, 2) the December 1, 2011 Commission meeting, 3) at a public meeting on January 12, 2012, and 4) the current project proposal.



Figure 14: Progression of the garage design, showing the proposed size and location in 1) the original concept design (green), 2) the December 1, 2011 Commission meeting (purple), 3) at a public meeting on January 12, 2012 (orange), and 4) the current project proposal (blue).

Reduction in the number of on-site parking spaces

Since its original proposal, the USACE has worked with the Director of National Intelligence to reduce the total number of on-site parking spaces from 2,240 to 1,825. Within this total, the number of designated employee parking spaces is also reduced from the original proposal of 2,000 to 1,560; which is an improvement in the parking ratio from one space per 1.5 employees to one space per 1.92 employees and well within NCPC's recommended goal of one space per 1.5 – 2 employees for suburban installations located away from metro stations. The remaining number of parking spaces (265) will be allocated between a 25-space lot for visitor parking and other uses such as fleet and vanpool parking.

During discussions with the community that followed the Commission's December 1, 2011 review of the project, the USACE and DIA had agreed to reduce the number of parking spaces from 2,240 to 2,025 (a reduction of 215 spaces). The further reduction of an additional 200 spaces (to 1,825) is in response to a compromise developed between the community and the DIA that allows the addition of up to 200 extra on-site parking spaces when the site is fully staffed if the alternative transportation programs fail to achieve DIA's goals. The determination of the need for extra spaces will be based on an objective process to be agreed-upon by the DIA and the community.³ These extra 200 on-site parking spaces are now not part of the master plan, and any future construction of these spaces will require a modification to the master plan.

Reduction in garage size

The reduction in on-site parking spaces will be reflected in the size of the garage, which will now be limited to 1,800 spaces (the remaining 25 spaces on site will be within the visitor parking lot). This has allowed the USACE to reduce the length of the garage, from what was proposed on December 1, 2011, by approximately 97 feet (from approximately 482 feet to approximately 385 feet) and a reduction in its overall footprint by approximately 24,056 total gross square feet (or from approximately 119,536 to approximately 95,480 total gross square feet). This is a total reduction of approximately 20 percent.

Repositioning of the garage

The USACE has also refined the position of the garage, shifting it as close the existing Maury Hall as the AT/FP requirements will allow, and shifting it north as far as possible without negatively the existing trees along the north end of the site and required roadway / drive geometries. These actions result in approximately 75% of the footprint of the garage being placed on the existing parking lot, with the remainder placed on a small forested area, an existing maintenance area, and an area of grass and scrub.

³ The compromise will be detailed within a letter of commitment to the community currently under development by the DIA. The letter of Commitment is being developed in response to a January 22, 2012 draft memorandum of understanding, submitted to the USACE and DIA by the local Communities. See Appendix E.

This repositioning of the garage, together with the reduction of the garage size, has significantly reduced the project's impact on the existing trees within the Potomac Palisades, only requiring the loss of approximately 0.75 acre of forested area versus approximately 3 acres as previously proposed. Much of this loss is not due to the garage footprint itself, but is attributable to the area required for the proposed screening that includes a reverse slope berm (described below), the perimeter fence and clear zone, and the area of disturbance required for construction of the garage. Of note is that the USACE has positioned the garage in a manner so that no specimen trees (those with trunk diameters of 30 inches or greater) will be lost to construction of the garage.



Figure 15: Aerial view of garage site. The red outline represents portion of forested area, service drive, and landscape area to be within the footprint of the garage as currently proposed. Based on staff's calculation, this is approximately 0.20 acres. Another approximately 0.55 acres of forested area will be disturbed to provide for the reverse slope berm and the perimeter fence and clear zone behind the berm, and for construction. This disturbed area is primarily to the south of the garage (on the right side of the red outline in the figure).

Retaining the existing Palisade topography and screening the garage

In repositioning the garage on site, the USACE is able to limit much of the site grading on the west side of the garage to within the area of the existing parking area and proposes to drop the grade east of the edge of the existing parking area to allow for the lower two levels of the garage to remain open. This in effect retains much of the existing trees and topography in the area. In addition, the USACE proposes to lower the topography towards the garage on the west side to allow the lower two levels of that side to be open, this lowering in effect will create a reverse slope berm that will screen most

of the parking garage when viewed from lower elevations, such as from MacArthur Boulevard and Wapakoneta Road. On the west side of the garage site, the existing edge of the parking lot will be, for much of the area, the top of the reverse slope beam.

To further screen the garage and in addition to the previously proposed green screen on the sides of the garage, the USACE is proposing to add a screen of evergreen trees along the top of the reverse slope berm that when mature, will screen all but the top 5 to 10 feet of the garage.



Figure 16: Site plans of the progression of the garage design, showing the proposed size and location in 1) the original concept design (left), 2) the December 1, 2011 Commission meeting (center), and 3) the current project proposal (right). The limit of the disturbed forested area is depicted by the green line. Specimen trees are depicted as dark green circles; the current project proposal does not remove any specimen trees and limits disturbance of the forest to the south of the garage (left side of figure) and a small portion of the of the area to the west of the garage (top side of the graphic).

Placing the Palisades portion of the site outside the perimeter fence

In the areas west and south of the garage, the USACE is proposing to pull the site perimeter fence behind and below the reverse slope berm and within 15 feet of the garage. The required clear zone for security purposes will be maintained within this area. No external roadways or paths will be built outside of the site perimeter fence. In addition, the USACE is proposing to move the perimeter fence on the north side of the site into the site (as close as 15 feet to the commercial vehicle screening facility) to preserve much of the existing vegetation that exists between the site and the Sangamore Local Park and Waldorf School.

Reduction in size of temporary stormwater retention area

The USACE has reduced in size the proposed temporary stormwater retention area (required during construction) located near the southwest corner of the garage (at the

construction area's low point). This reduction in size significantly reduces the amount of forested area previously proposed to be removed for this facility.

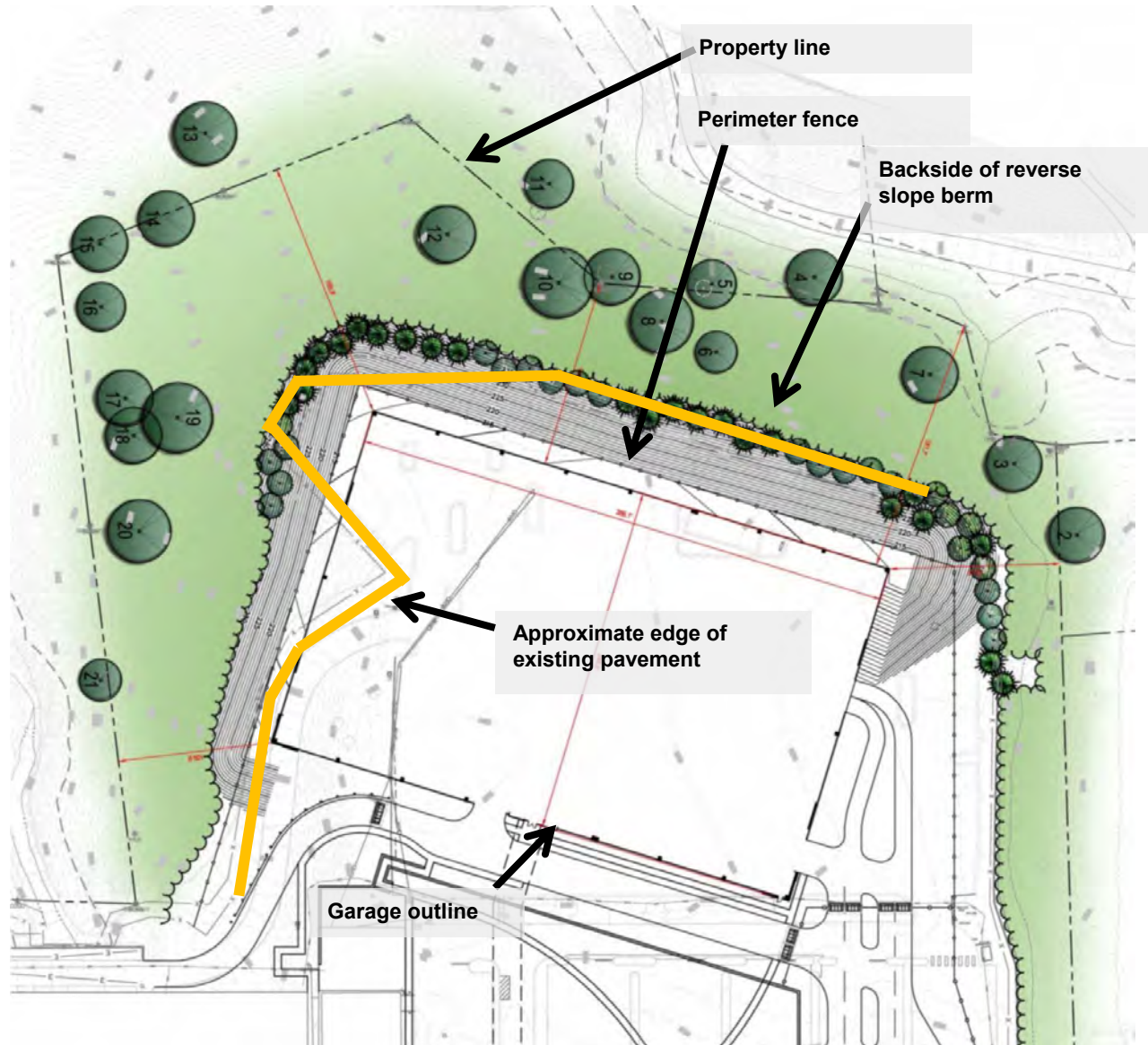


Figure 17: Proposed garage site plan. The top of the reverse slope berm is proposed to be planted with a row of evergreens. The site's perimeter fence is pulled close (approximately 15 feet) to the garage with the clear zone between the fence and garage wall and upon the backside of the reverse slope berm. The edge of the existing pavement is roughly outlined by the orange line. Specimen trees are depicted as dark green circles; the current project proposal does not remove any specimen trees.

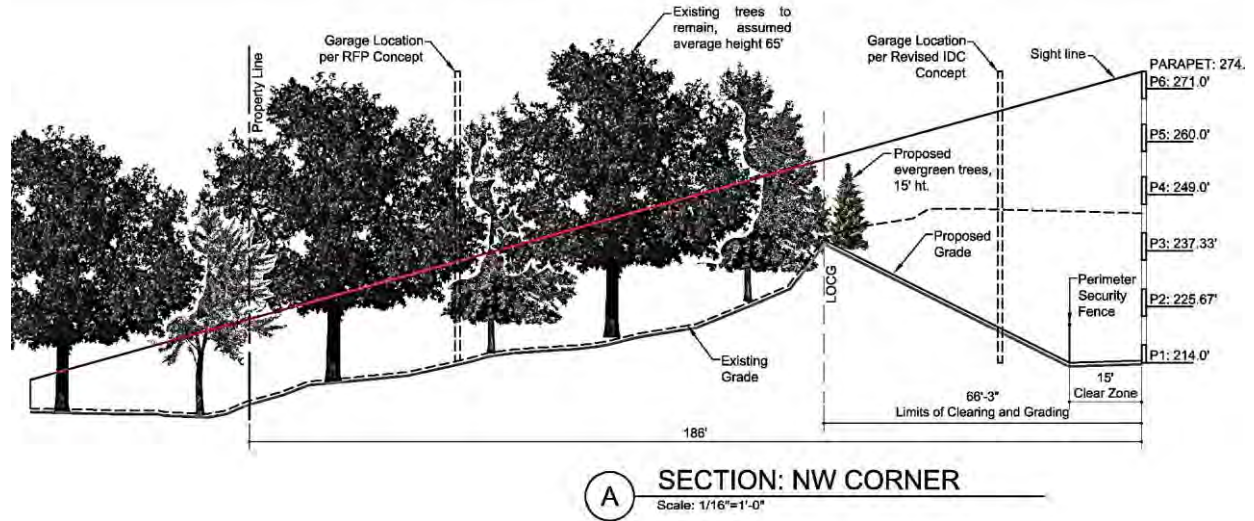


Figure 18: Section A, view of garage from Wapakoneta Road.

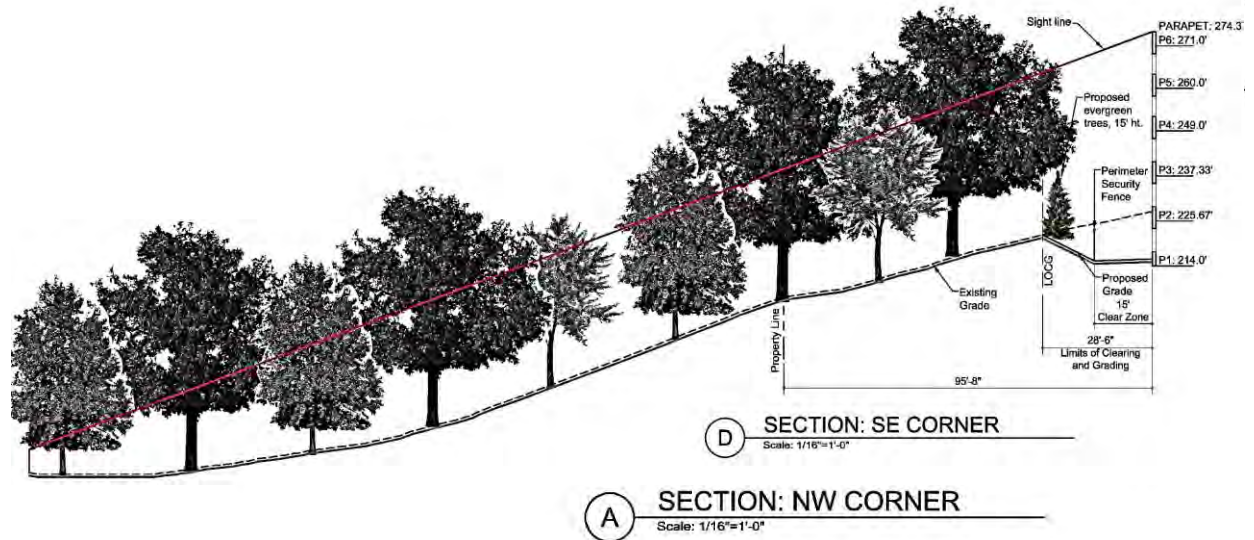


Figure 19: Section C, view of garage from MacArthur Boulevard (note that this view is not updated to reflect the latest garage configuration, including a reduction in its footprint, which will result in it being further from MacArthur Boulevard).



Figure 20: Illustrated view of proposed garage from MacArthur Boulevard; omitted from this view is the proposed screen of evergreen trees and the proposed green screen on the side of the garage.

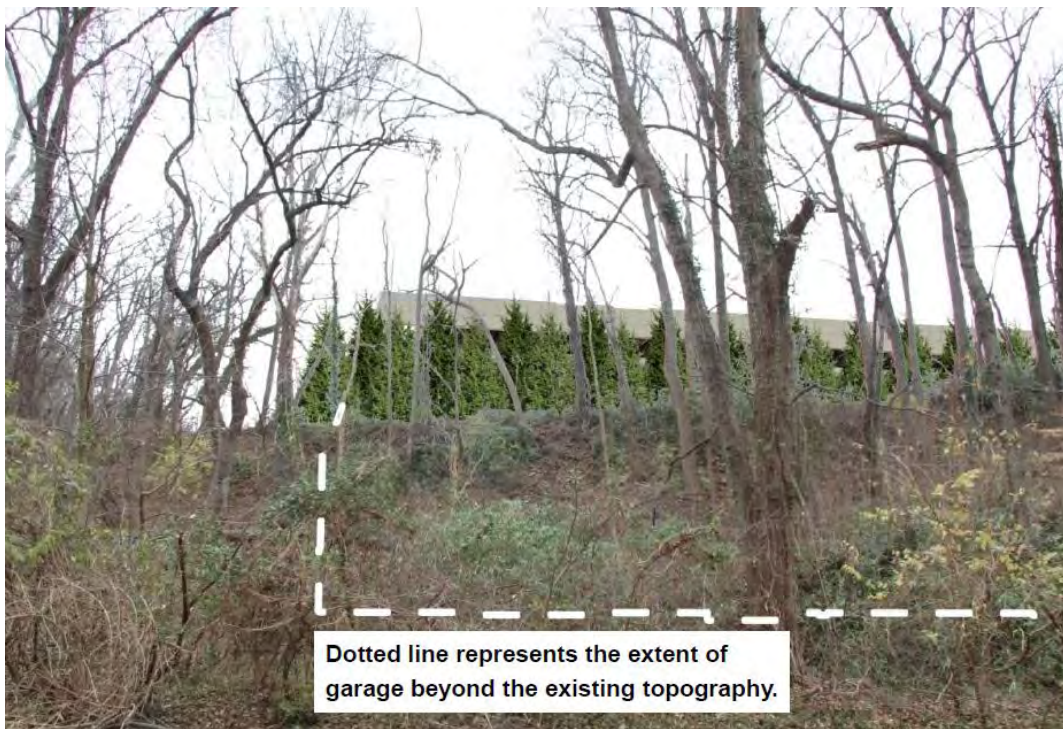


Figure 21: Illustrated view of proposed garage from Wapakoneta Road, showing the top of the reverse slope berm kept in its natural state on the west side and the proposed screen of evergreen trees. The proposed screen of evergreen trees will screen all but the top 5 – 10 feet of the garage from this view. Omitted from this view is the proposed green screen on the side of the garage.

II. PROJECT ANALYSIS/CONFORMANCE

Executive Summary

Since December 1, 2011, when the Commission deferred action on the master plan and required the applicant to evaluate alternatives to the size, location and capacity of the parking garage, and to study the exclusion of parking from the secured perimeter, the USACE has made significant changes to the master plan for the Intelligence Community Campus—Bethesda. In particular, the USACE: confirmed with the Director of National Intelligence that the program requirements include parking within the site's secure perimeter and that the tenant program requires identity checks for personal vehicles and searches for commercial vehicles; studied alternative physical configurations and site layouts for the parking garage; reduced the total number of on-site parking from 2,240 to 1,825; and identified a preferred physical configuration and site design for the garage that includes a reduction in the garage's overall footprint of approximately 20% and a maximum of 1,800 parking spaces. In addition, the USACE and the DIA have continued their dialogue with the community and are developing a Letter of Commitment designed to address and resolve the concerns of the community regarding adverse impacts of the project, and the community has expressed to staff its general support for the project with the above changes. As such, **staff is recommending that the Commission approve the master plan for the ICC-B for use by the Commission as a guide for future reviews of individual site and building projects at the installation.**

Because the Master plan appropriately reuses and modernizes an existing federal facility and, with the above mentioned changes, proposes to significantly improve upon the environmental conditions of the installation, **staff recommends that the Commission commend the USACE for its plan to reuse and modernize an existing federally owned facility in a manner that acknowledges the facility's historic significance and substantially improves the environmental sustainability of the site.**

In addition, over the past month and a half the USACE and the DIA have made significant efforts to reach out to the community and discuss their issues, including a number of meetings with community and county leaders, and a public meeting at the Waldorf School adjacent to the site. These meetings were in addition to several other smaller discussions and communications. The result of this outreach is an improved-upon master plan. As such, **staff recommends that the Commission also commend the USACE and the community for their extensive coordination efforts since the Commission's December 2011 meeting to resolve issues related to site design, transportation and parking, visual impacts, deforestation, and stormwater management.**

As there have been major changes to the master plan through the recent dialogue with the community and including the elements noted above, the USACE has not had the opportunity to make the appropriate revisions to the master plan documents (including the site development guide and the associated traffic study). As such, **staff recommends that the Commission note that the Commission will consider the Staff Recommendation and Commission Action as the Intelligence Community Campus-Bethesda Master Plan until the USACE submits an updated Site Development Guide.** Further, because this update does not exist, **staff also recommends that the Commission note that the final master plan:**

- **Includes a maximum site capacity of 3,000 employees.**

- Includes a total onsite parking capacity of 1,825 spaces with a total number of employee parking spaces of 1560, which equates to a parking ratio of one space for every 1.92 employees.
- Includes a parking garage that is approximately 248 feet in width and 385 feet in length and has a maximum capacity of 1,800 parking spaces.
- Does not include a provision for a helipad.
- Includes reestablishment of the four-way, stop sign controlled intersection at Sangamore Road and Sentinel Drive as part of the Phase 2 build out of the site.
- Minimizes required tree clearing along the west side of the site to less than 0.75 acres and preserves all existing onsite specimen trees.
- Includes a landscaped, 10 – 15 foot reverse berm along the west side of the site, and additional berms and vegetated buffers along the north and east sides of the site, to help screen views of the garage and reduce the impacts of vehicle lights on the Potomac Palisades, adjacent National Park Service property, and surrounding residential neighborhoods.
- Includes provisions to remediate onsite stormwater runoff erosion and sedimentation damage caused during the previous occupancy of the site.

Staff also recommends that the Commission note that any changes to the master plan, including but not limited to changes in the amount of onsite parking and proposals for additional building construction, are required to be submitted to the Commission for review in accordance with the National Capital Planning Act and NCPC's Submission Guidelines.

To ensure that an updated Site Development Guide and other documents are completed and reflect the elements of the plan approved by the Commission, **staff also recommends that the Commission 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.
- An amended traffic impact study and Transportation Management Plan that reflect the reduction of onsite parking to 1,825 total spaces.
- 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*).
- A copy of the signed Letter of Commitment from the Defense Intelligence Agency to the community.

Analysis

Staff's analysis is discussed below under the issue headings of site design, Architectural compatibility with the neighborhood, environmental consideration (other than transportation), and transportation considerations.

Site design

The Intelligence Community will meet multiple operational efficiencies and objectives through the redevelopment of the site. Currently the existing site facilities are not integrated with the community, and operational/mechanical systems within the site's existing buildings are inadequate for current design codes and will not support future planned missions.

The proposed facility renovations include the removal of Abert Hall and Emory Hall, and the consolidation of Erskine Hall, Roberdeau Hall and Maury Hall into one building using a new Centrum and the New Infill Building (NIB). The oldest of these buildings, Erskine Hall, dates back to 1941; Roberdeau Hall in 1966, and Maury Hall in 1986. All of these facilities do not meet modern design standards and must be structurally upgraded to meet current design codes. The disparate age of these facilities and evolutionary development of the site also leads to significant space utilization problems as the existing structures have been repurposed over the last 70 years to adapt to the site's ever changing high-tech mission. The integration of Erskine, Roberdeau, and Maury Halls, together with the new construction of the NIB and Centrum, presents significant efficiency gains from an operational and capital development perspective and will be instrumental to the success of the interagency missions planned for the facility.

In addition, a core objective to redevelopment of the site is to significantly improve the architectural presence of the facility, including reducing the significant amount of at-grade, on-site parking and providing enhanced green spaces around the new and redeveloped facilities. A cornerstone element to achieving this objective will be construction of the proposed parking garage in the northwestern corner of the property. This parking garage will enhance the sustainability of the proposed development by reducing the extensive amount of impervious asphalt surface associated with the existing surface parking. Reducing the asphalt footprint will significantly reduce and improve stormwater quantity and quality emanating from the site and reduce the heat island effect associated with the existing site. The proposed parking facility will allow for changing 6 acres of impervious pavement to green space at the front of the site and enhancing the community's view of the site from Sangamore Road. Placement of the parking facility near the rear of the site, away from Sangamore Road also enables reconfiguration of the site's main entrance and provides enhanced space for visitor access and queuing at the Entry Control Facility.

A comprehensive landscaping plan will be developed in conjunction with the proposed facilities to provide an enhanced viewshed from Sangamore Road and to break up building masses. This landscaped area will incorporate native species endemic to the region to accentuate connectivity to the adjacent parkland



Figure 22: Historic photo of Erskine Hall.

(source: easturotopo.org/archive/history%20army%20map%20service%20wwii.html)

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 Comprehensive Plan for the National Capital. Considering the modernization, repair, and rehabilitation of existing federally owned facilities for federal workplaces, before developing new facilities, is another key policy within the Comprehensive Plan that this proposal supports.

The redevelopment of the site also allows the federal government to continue to use this long-held federal facility, supporting local businesses, and contributing to the sustainment of the regional economy, important policies set forth within the Comprehensive Plan.

Further, the Comprehensive Plan maintains policies that encourage the federal government to develop sites and buildings consistent with local agencies' zoning and land use policies and development, redevelopment, or conservation objectives—to the maximum extent feasible. The redevelopment of the site is consistent with Montgomery County's recommendation within its *Bethesda Chevy Chase Master Plan (1990)* to maintain the type of federal employment currently proposed at the site, as well as to not increase the number of employees at the site (historically approximately 3,000).

Architectural compatibility with the neighborhood

The site redevelopment is focused on redefining the existing complex to serve the emerging operational and secure space needs of the Intelligence Community. The project is focused on redeveloping the site in a context sensitive manner, improving its face to the neighborhood and reducing environmental impacts associated with site operations.

A key architectural objective to redeveloping the site includes renewal of facilities that date back over 70 years to serve technical missions for the site's next 25-years, which is the planning

horizon of the master plan. The redevelopment must effectively increase connectivity within the complex to foster a collaborative environment suitable for coordination between multiple agency groups, and incorporate allowances for technology integration not envisioned when these older facilities were originally constructed. Given the technology driven missions projected within the installation, designing a clean, minimalist design with broad Information-Technology system flexibility inherent to secure computing environments is vital to the success of the installation.



Figure 23: Two views of existing conditions along Sangamore Road (top looking south, bottom looking north). The existing site access and gate, and employee pedestrian entrance at Sangamore Road and Sentinel Drive can be seen in the bottom view.

Other challenges with the reuse of the site include the age of existing campus support infrastructure (water, sewer, steam and chilled water systems); the presence of historical artifacts in front of Erskine Hall and elements of Erskine Hall itself; the requirement to improve setbacks and minimize impacts to adjacent property owners; and the need to connect fragmented building spaces which currently impede team collaboration.

Redevelopment of the site is focused on incorporating sustainable practices in the renewal of the facilities on the installation. A key guiding element to this redevelopment will be the use of U.S. Green Building Council Leadership in Energy and Environmental Design (LEED) principles, with the USACE designing the whole site to achieve at least a LEED Silver certification, and for the Visitor Control Center to achieve a LEED Gold certification and have "net-zero" energy efficiency. A core element of the approach to achieve these standards is maximum reuse of the existing facilities on-site. This includes reuse of Erskine, Maury and Roberdeau Halls. The other two core buildings in the complex, Abert Hall and Emory Hall will be removed and replaced with the NIB and Centrum.

Due to structural limitations of the existing buildings, the NIB and Centrum will be structurally independent of the existing facilities that will remain. This configuration presents challenges when blending the architectural style of the existing buildings with the new construction. In addition, the structures and brick exteriors of many of the existing buildings do not meet current AT/FP or mission requirements, necessitating the reengineering and recladding of these structures. As such, the design proposes to use a contemporary glass curtain wall on both the new and existing buildings, designed to both break up the building masses and provide unity among the now architecturally unrelated existing structures and the new construction.

As the proposed contemporary design of the facility is a departure from the current character of the site's existing structures, staff suggests that the USACE continue to work with the community as the site's architecture advances to ensure that the proposed architectural approach and use of materials are in harmony with the character of the surrounding community, which consists primarily of low-intensity suburban development. To address staff's concern regarding architectural compatibility of the project with the neighborhood, the USACE has agreed to continue coordination with the community and the Maryland-National Capital Park and Planning Commission (M-NCPPC) and to submit building and landscape design plans for each project phase for review by the M-NCPPC. As such, **staff recommends that the Commission both: encourage the USACE to continue its close coordination with NCPC and all other interested and affected stakeholders during design development of individual site and building plans; and, note that the USACE has committed to submitting building and landscape design plans for each project phase to the M-NCPPC for review of massing, articulation and materials of buildings, landscape design, and screening.**⁴

Environmental considerations (other than transportation)

The 39-acre site currently consists of a mixture of buildings, parking lots, landscaped areas, and forested areas. As the headquarters for the NGA and the location of some of its predecessor agencies, activities at this site have included photoprocessing and printing. With the

⁴ The Maryland-National Capital Park and Planning Commission reviewed the ICC-B concept design on September 22, 2011. Their comments are included in Appendix B: Maryland State Clearinghouse Recommendation, October 3, 2011.

advancement of digital technology in the 1990s, the use changed to a more administrative complex. The six existing buildings are generally located on the south side of the site with a large, well-maintained, landscaped area located near the southeast corner of the site in front of Erskine Hall. Large surface parking areas with approximately 1,550 spaces take up much of the property on the north side of the site. Some additional surface parking is located along the south side of the site. Almost 70 percent of the site consists of impervious ground cover.

The redevelopment of the site provides the federal government an opportunity to substantially change the site's effects on the environment.

The site's topography will remain largely unchanged following redevelopment except for the addition of the parking garage, which will include features to significantly reduce runoff associated with the existing surface parking area. Stormwater is proposed to be collected through a network of pipes and conveyed to bioretention filters and an underground detention vault north of the proposed parking garage. Earlier calculations based on the original concept for redevelopment showed that the proposed site layout would reduce the overall impervious area from 67 percent (19.6 acres) to 37.7 percent (9.6 acres) for a total reduction of impervious area of approximately 49 percent. Within this original concept, site grading was to be done in such a way as to provide positive drainage away from the buildings and all roadways and parking areas and stormwater runoff from the loading docks, entry road, access control point and walkways was to be collected and routed to bioretention filters. Stormwater runoff from the parking structure was to be collected and routed to a detention structure at the north end of the structure, with the detention facility originally designed to outfall into the existing ephemeral stream that follows the north boundary of the site.

On January 23, 2012 the Maryland Department of the Environment (MDE) approved the USACE's stormwater management and sediment and erosion control plan based on the original concept. However, since the development of that stormwater management plan and as discussed throughout this report, there have been major changes to the proposed development on the site, including the resizing and reorientation of the garage. As such, the USACE is currently modifying the stormwater management and sediment and erosion control plan to correspond to the changes in the master plan. A letter from the USACE to the MDE notes that this modification is occurring and that no construction or tree removal will occur until the MDE permit is amended to reflect the modifications.⁵

In addition to stormwater issues on-site, off-site issues have also been a concern. In particular, erosion problems exist in two or more areas downhill of the site on the National Park lands, and the C&O Canal subsequently suffers from the sedimentation of material eroded from these areas. It appears the stream on the northern edge of the site carries water to the National Park lands from springs and runoff from the Sangamore Local Park and Waldorf School immediately north of the site, as well as water from a storm sewer outfall near the northwest corner of the site's existing parking lot. Another stream, or deep gully, runs from the site property line near the southwest corner of Erskine Hall down through the National Park lands to the Clara Barton Parkway. As such, on January 10, 2012, the Superintendents of both the C&O Canal National Historic Park and the George Washington Memorial Parkway submitted a letter to the USACE requesting 100 percent stormwater retention onsite and the remediation of the damage caused

⁵ See Appendix F: USACE letter to the Maryland Department of the Environment and MDE January 23, 2012 approval of the ICC-B stormwater management and sediment and erosion control plan.

by the historic stormwater flows within the National Parks (the letter also requests a reduction in the amount of proposed tree loss associated with the construction of the garage and notes the potential negative view impacts of the garage upon the Potomac River valley).⁶ In response to this request, and similar requests by the community, in modifying the stormwater management and sediment and erosion control plan the USACE is working to achieve as close to the 100 percent on-site retention of stormwater as engineering and budgetary constraints allow. The USACE has also been working with many local and federal partners to identify available funding for remediation of the off-site erosions and sedimentation problems. As such, and as noted above in the executive summary, staff is recommending that the Commission request that the USACE submit at the time of review of Phase I / North Campus elements information demonstrating compliance with the MDE's local stormwater requirements as based on the modified plan. In addition to this, **staff recommends that the Commission note that the USACE 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. Staff also recommends that the Commission note that the USACE has committed to submit landscape design plans for each project phase to the National Park Service to ensure compatibility with the adjacent National Park.**

Separate from the MDE permit process discussed above, the USACE must also comply with stormwater design requirements under Section 438 of the Energy Independence and Security Act (EISA). EISA established into law requirements for federal development projects to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of a site. Because the USACE has continued to adjust its site plan and further investigate solutions to both the on-site and off-site stormwater issues, **staff recommends that the Commission request that the USACE submit at the time of review of Phase I / North Campus elements information demonstrating compliance with federal requirements under Section 438 of the EISA. Staff also recommends that the Commission encourage the USACE to maximize onsite stormwater retention and reuse to the extent technically feasible given the sensitive nature of the adjacent National Parkland to the west.**

Of particular concern to Montgomery County, the National Park Service, and residents within the surrounding community is the impact the redevelopment, and in particular the garage, may have on the tree line of the Potomac Palisades. The *Bethesda Chevy Chase Master Plan (1990)* contains many recommendations to preserve the Potomac Palisades' wooded slopes and associated vistas and states on page 64 that "The scenic Palisades is one of the few areas in Montgomery County with a combination of delicate, irreplaceable environmental features of wooded bluffs, river, and cliffs. The large stands of mature trees are not only a critical asset from an environmental perspective but also greatly contribute to the ambience associated with the area. The steep slopes of the Palisades are an integral part of this character since they form the scenic vistas and overlooks of the Potomac River. Their preservation in an undisturbed state is essential to minimize erosion and stream degradation. Due to these unique and relatively unspoiled characteristics, it is of great importance to protect this area through a variety of measures."

⁶ See Appendix D: Letter from the National Park Service to the USACE, submitted on January 10, 2012.

As discussed above in the current project proposal, the location of the parking garage will impact a portion of the wooded area along the western portion of the site. However, USACE has worked to decrease the physical footprint of the garage, reorient the garage, and minimize the amount of impacted wooded area specifically along the northern and western boundaries of the site—all efforts to reduce the visual and other impacts of the garage. USACE has also worked to pull the property fence line as close to the parking structure as possible and to minimize to the extent possible, the impact on existing trees/wooded area by leaving portions of the site within the steeply-sloped forested area outside of the security fence line.

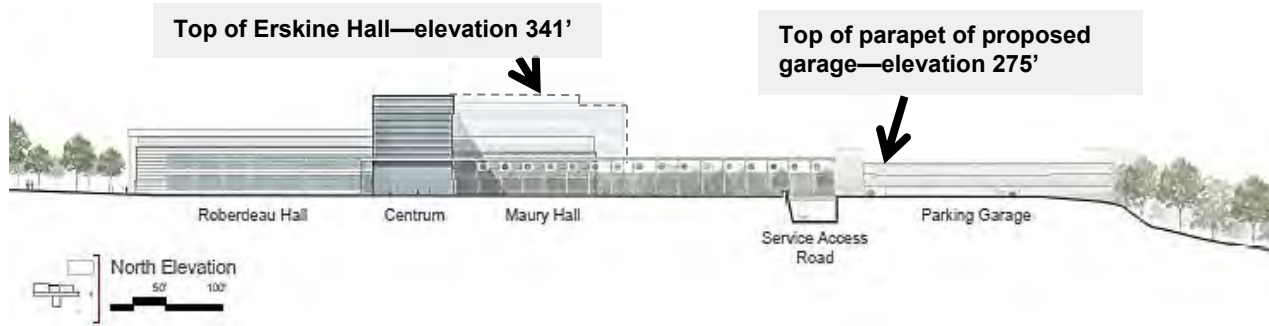


Figure 24: North elevation of early concept design. While the horizontal location of the garage is now modified from the early concept design illustrated above, the vertical relationship (heights) of the proposed garage to the existing structures essentially stays the same as the illustration shows. Following redevelopment, the top of Erskine Hall will remain at 341 feet above sea level and the top of Maury Hall will remain at 297 feet above sea level. The top of the garage parapet is proposed to be 275 feet above sea level.

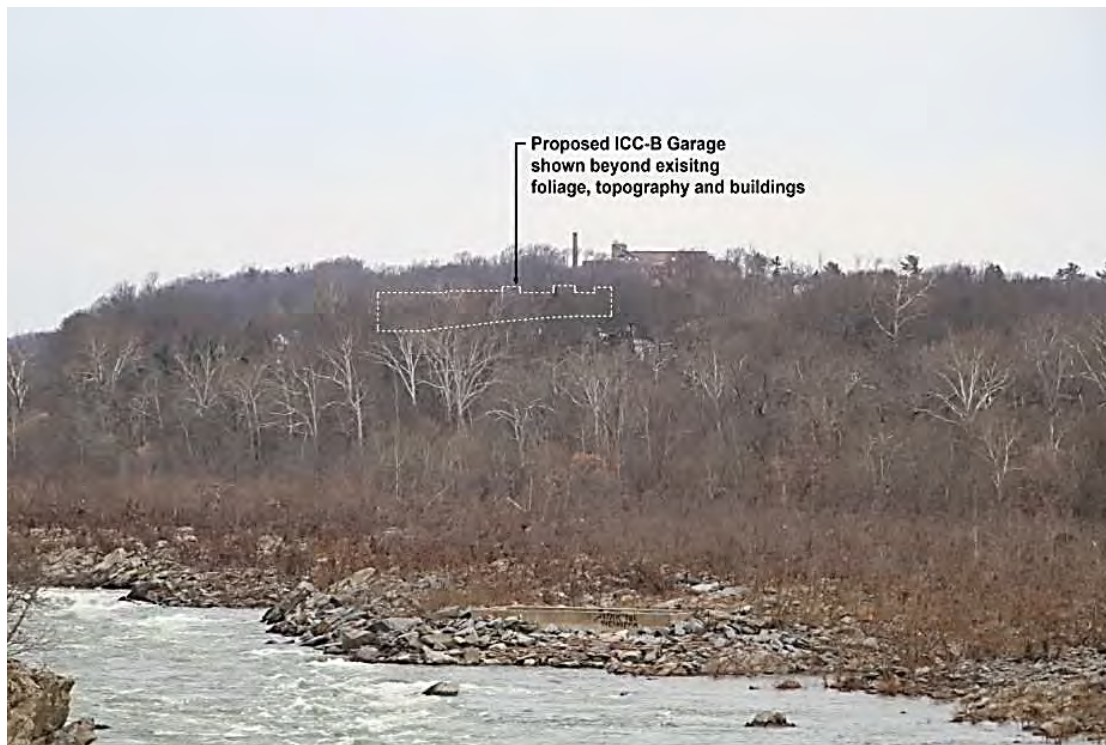


Figure 25: Illustrated view of proposed garage and site from across Potomac River, at riverside.

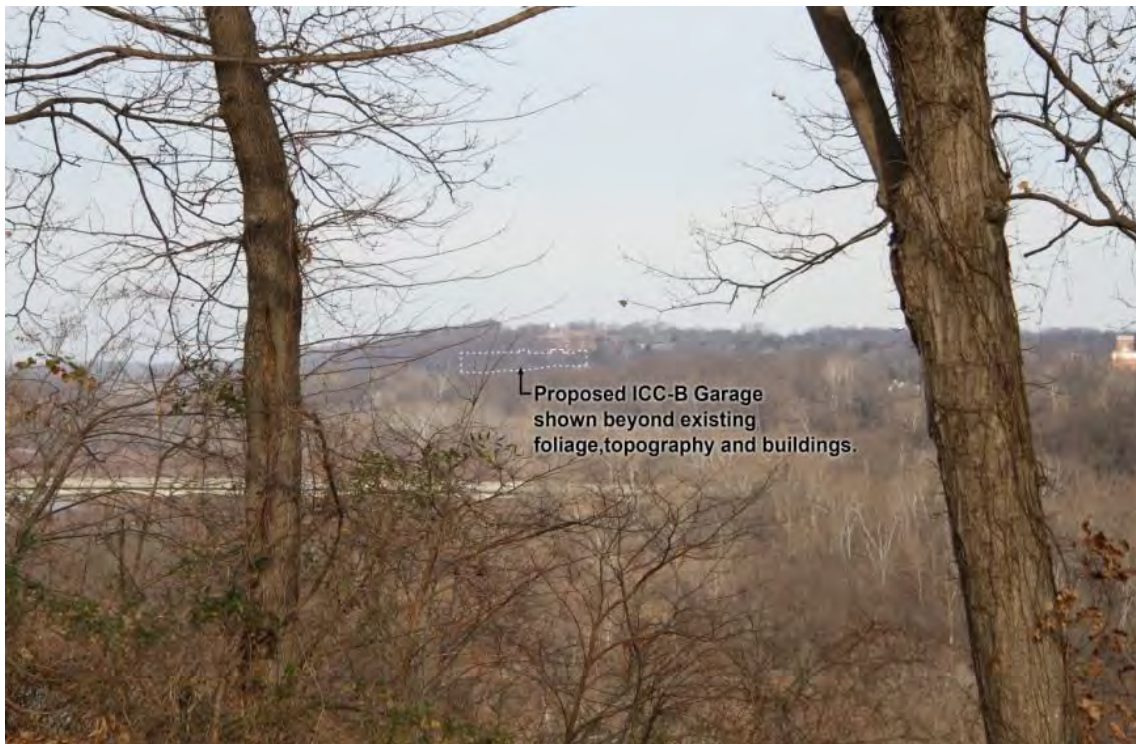


Figure 26: Illustrated view of proposed garage and site from across Potomac River valley.

A number of other changes to the site will impact the site's visual presence. Designs will incorporate features that minimize long-term impacts to views from the National Park lands and local neighborhoods. For example, the use of a screening line of evergreen trees and vegetative green screening on the north, west, and south sides of the parking garage is proposed to camouflage the views from NPS property, the surrounding community, and MacArthur Boulevard. In addition, no construction will exceed the height of Erskine Hall. As a result, views towards the site from the NPS overlook located in Virginia, off of the George Washington Memorial Parkway, appear to be minimally affected if at all. Additionally, the plan includes the conversion of roughly nine acres of impervious parking surface to green space that includes trees, shrubs, groundcovers and sod and the planting of native trees between the campus fencing and the sidewalk located on the western side of Sangamore Road. These features will improve the view of the facility from neighboring land uses to the north, east, and south of Sangamore Road.

Landscaping will be constructed in accordance with UFC 3-201-02, *Landscape Architecture* and all applicable LEED requirements. The Army will also complete a Forest Conservation Plan, as required by the Maryland Forest Conservation Act, which will include a map and narrative describing how existing forested and sensitive areas at the site will be protected and how any required replacement of plantings (on or off-site as allowed under the Act) will be implemented.

Lighting of the proposed parking garage will only illuminate the parking structure itself. No overhead lights would be installed on the upper level of the garage. The goal of the design of the lighting to meet LEED Silver status is to ensure no light pollution leaves the site.

Transportation considerations

The installation currently provides a total of 1,550 parking spaces for employees and visitors. A total of 1,825 parking spaces is proposed, with 1,560 provided for general employee parking, approximately 240 reserved for fleet, vanpool and other uses, and the remaining 25 reserved for visitors. With a proposed maximum number of 3,000 employees, the ratio of parking spaces per employee is 1:1.92, which falls well within the recommended Comprehensive Plan policy guidance of 1:1.5 - 2, based on the site's suburban location beyond 2,000 feet of Metrorail.

Based upon the traffic analysis conducted in December 2010, USACE recommended relocating the site entrance approximately 350 feet north of the existing intersection, thus providing for two three-legged offset intersections. Existing stop signs were also recommended to be eliminated along Sangamore Road at Sentinel Drive, while the stop sign for eastbound (EB) traffic exiting the site and westbound (WB) traffic on Sentinel Drive was recommended to remain. Sangamore Road between Sentinel Drive and the site entrance was also recommended to be restriped to create a dedicated left turn lane for southbound (SB) motorists turning onto Sentinel Drive and northbound (NB) motorists turning onto the site entrance road. The proposed new entrance at the northern portion of the site and the recommended removal of the stop signs at Sentinel Drive were derived in an effort to maximize the Level of Service for through-traffic along Sangamore Road.

After discussions with the Montgomery County Department of Transportation (MC-DOT), it was determined that the stop-signs would remain at Sangamore Road and Sentinel Drive to control traffic and provide for pedestrian safety. Based on this condition, USACE conducted additional traffic analysis, and concluded that leaving the primary site entrance in its current location (across from Sentinel Dr.) yields an optimal site access configuration for the final site layout. The design details of the realigned access road are still being developed, however the USACE has developed a scheme to construct the original proposed new entrance at the northern portion of the site for use during redevelopment of the site by both construction and subsequent employee access. Following, and as a component of Phase 2, a new entrance roadway will be constructed at the site of the current main entrance (at the intersection of Sangamore Road and Sentinel Drive) and the new entrance at the north portion of site will be removed and the area will be landscaped.

In regards to traffic impacts exterior to the site, the USACE is currently revising its traffic study to reflect the change in the location of the final site entrance and reduction in proposed on-site parking and to show potential changes in traffic patterns at nearby key intersections. The USACE will then provide this information to MC-DOT, which will conduct further analyses and develop recommendations for future County roadway improvements. These recommendations are expected to be developed mid-2012. Because traffic impacts and complete traffic studies are important components of staff's project analyses, and as noted above in the executive summary, staff is recommending that the Commission request that the USACE submit at the time of review of Phase I / North Campus an amended traffic impact study and Transportation Management Plan that reflect the reduction of onsite parking to 1,825 total spaces.

Separately from USACE's activities associated with development of the site, the community has established a traffic committee to monitor, analyze, and evaluate traffic congestion and pedestrian safety related issues in the area and has obtained commitments from the MC-DOT and DIA to participate in the committee. **Staff recommends that the Commission note that the DIA has made this commitment to participate in this Joint Traffic Committee with**

representatives from the Community and the MC-DOT to monitor, analyze, and evaluate traffic congestion and pedestrian safety related issues.

Transportation Management Plan (TMP)

The Army developed a draft Transportation Management Plan (TMP), dated August 26, 2011, in accordance with the Comprehensive Plan and Montgomery County guidance. A core focus of the proposed site improvements is to improve site safety and security by providing enhanced on-site parking and improved on-site transportation management facilities. Core features of these proposed improvements related to the TMP include:

- Construction of a new dual lane, divided roadway entrance drive
- The addition of new turning lanes and transition areas along Sangamore Road
- Consolidation of 12.0 acres of existing at-grade site parking into a garage with a footprint of approximately 2.2 acres
- Provision of enhanced cycling and pedestrian facilities
- Provision of an enhanced bus shelter and drop off point for employees
- Developing infrastructure to support multiple occupant vehicle commuting to the site

Recognizing that the national capital region is routinely rated as one of the most congested areas of the nation, the TMP is focused on maximizing the use of alternative transportation means and reducing single-occupant vehicle trips to the ICC-B site on Sangamore Road. This will require a concerted effort by site leadership to fit regional planning guidance into facility operational policies. The TMP provides the framework for this effort through a number of objectives, including:

- Promote carpool and vanpool use for routine commuting to the site. This will include provision of covered drop-off and pick-up locations for vehicles up to a 15 passenger van size within the site, and promotion of the regional "Guaranteed Ride Home" program to foster car and vanpool participation. Brief new employees on the benefits of these programs and provide incentives for participation (as allowed by federal employment rules).
- Provide pre-tax deferral elective option on payroll accounts to enable employees to offset cost of using public transportation as allowed by state and federal tax codes.
- Publish and promote alternative transportation options for site employees in a formal guidance document establishing site policies. This will include means for providing mass transit commuting options information to new employees, intranet posting of car and vanpool routes, schedules and contact information within facility IT systems, and highlighting transportation metrics and quarterly commuting impacts to site employees.
- Appoint a Transportation Liaison Officer (TLO) to coordinate site traffic impacts with the local community, regional authorities and employees. This person will provide periodic updates of regional initiatives to facility command staff, advise on means to reduce single vehicle occupancy trips to the site and increase average vehicle occupancy for commuting, and track and report transportation metrics consistent with this TMP. This individual will be responsible for review and update of this TMP in two year increments based upon initial occupancy date of the site and coordination of transportation planning with the Montgomery County Commuter Services Department, including coordination of the annual commuter survey with site employees.

- Offer work schedule enhancements for car and vanpool drivers to promote participation consistent with job requirements.
- Develop on-site lockers and showers to encourage walking, jogging, or bicycling to work.
- Provide secure, covered bicycle parking facilities and promote bicycling to work using the regional trail systems.
- Provide enhanced parking conveniences for carpool, vanpool, hybrid and alternative fuel vehicles.
- Provide a permanent and attractive display for transit and commuting information at main employee entrances, visitor access points and the parking facility. Post updated traffic advisories to staff to enable alternate route choices to avoid regional congestion during significant events and adverse air quality days.
- Provide integrated employee services/amenities on-site to reduce need for off-site travel during the day. Promote use of local businesses within walking distance of the site for off-site needs.

Because the facility was primarily vacated and new users will be coming to the installation following the site's physical redevelopment, staff recommended to the Army that the TMP be enhanced with a commitment of the site tenant to establish the TLO position, and all policies and programs related to carpool/vanpool options, transit incentives, shuttle programs, biking/walking incentives and the like prior to employees moving into the site. This will allow employees an opportunity to consider alternate modes of commuting to and from site prior to them establishing a routine of using single occupancy vehicles. Likewise, the tenancy of the installation remains in flux and it is unclear at this time where employees of the installation will be commuting from. As it is important to obtain and analyze this information to be able to establish strong programs related to carpool/vanpool options, transit incentives, shuttles, and biking/walking incentives, staff recommended to the Army that they resubmit the TMP, with any revisions that address the above.

In response to these recommendations, the Army provided staff an amended TMP dated November 9, 2011 that includes the following revisions:

- Primary focus of the TMP on the reduction of single vehicle ridership will be further emphasized. Specifically, the NCPD goal for parking (Suburban areas beyond 2,000 feet of Metrorail) of 1: 1.5 will be emphasized.
- In furtherance of "a." above, the operational procedures to limit full-time employee parking to 2,000 spaces (3,000 employees) will be addressed, and will be addressed specifically to include the reservation of parking spaces for GSA Fleet and other Government Vehicles, cleared visitor parking, reserved student/trainee/conference attendee parking, and reserved/preferential parking for car/vanpool vehicles.
- Appoint a Transportation Liaison Officer during the South Campus (phase 2) construction and prior to occupancy.
- In furtherance of "c." above, further develop and implement operational practices (car/van pools, transit/biking/walking incentives/employee recognition/etc.) prior to or in conjunction with occupancy. Implementation of such policies and programs prior to establishment of commuting patterns will facilitate overall accomplishment of TMP goals.
- Commit the site TLO to future, periodic TMP review/revision (including review during design/construction of phase 2 South Campus), and coordination with local transportation planning initiatives (such as the Purple Line).

As noted above in the executive summary, staff is recommending that the Commission request that the USACE submit at the time of review of Phase I / North Campus an amended traffic impact study and Transportation Management Plan that reflect the reduction of onsite parking to 1,825 total spaces.

Montgomery County has a very active transportation planning department and is currently engaged on numerous efforts to curb congestion, improve regional air quality and promote alternative transportation opportunities for area businesses and residents. Currently applicable programs that will be of potential benefit to the ICC-B site redevelopment include the development of the new "Purple Line" metro light rail improvement which is slated to connect New Carrollton on the eastern ring of the Capital Beltway to Bethesda. This initiative will form a vital east-west commuter rail link to the area, but it is only in the early planning stages and is not expected to be complete within the next 10 years. ICC-B site operators will continue to monitor this project and participate in planning efforts to maximize potential benefits for commuting employees.

Montgomery County is also developing the Capital Crescent multi-purpose trail approximately a half mile from the ICC-B site. This project will enhance regional trail connectivity enabling more options for cycling and pedestrian commuters. Both of these projects have potential long term planning benefits for the ICC-B site and will be monitored during TMP implementation to maximize potential benefits.

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 continue 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.

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 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

A summary of the Army Corps of Engineers' coordination effort associated with the proposal's Environmental Assessment and FONSI is attached as Appendix A. Since the Commission's December 1, 2011 review of the proposal, the USACE has had numerous informal meetings and communications with many varied stakeholders, and conducted a number of public meetings to further coordinate with the community, including: a December 22, 2011 meeting with community leaders; a January 10, 2012 meeting with community leaders; and a January 12, 2012 public meeting.

The proposal 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 are attached as Appendix B.

IV. APPENDICES

Appendix A: Coordination Summary, Environmental Assessment and Finding of No Significant Impact, Intelligence Community Campus.

Appendix B: Maryland State Clearinghouse Recommendation, October 3, 2011.

Appendix C: Letter from Montgomery County Chief Administrative Officer, November 30, 2011.

Appendix D: Letter from the National Park Service to the USACE, submitted on January 10, 2012.

Appendix E: January 22, 2012 draft Memorandum of Understanding, submitted to the USACE and DIA by the Communities.

Appendix F: USACE letter to the Maryland Department of the Environment and MDE January 23, 2012 approval of the ICC-B stormwater management and sediment and erosion control plan.

Appendix A

Coordination Summary

**Environmental Assessment & Finding of No Significant Impact
Intelligence Community Campus
Bethesda, Maryland (Montgomery County)**

Summary Table:

Coordination Effort	Dates
Public Notice to Prepare an EA	12 November 2010 (15-Day Comment Period)
Notice of Availability for the Draft EA and FONSI	3 June 2011 to 5 July 2011 (33-Day Comment Period)
Final EA and FONSI (Signed FONSI)	8 September 2011

Coordination Details:

- A public notice announcing the preparation of the EA was distributed on 12 November 2010. All comments on the public notice were asked to be received within 15 days.
 - *The public notice was sent to the following:*
 - U.S. Environmental Protection Agency – Region 3
 - U.S. Field and Wildlife Service – Chesapeake Bay Field Office (As required by Section 7 of the Endangered Species Act)
 - National Park Service – National Capital Region
 - Maryland State Clearinghouse, which sent the notice to the following State and local agencies
 - MD Dept. of Housing and Community Development
 - MD Dept. of the Environment
 - MD Dept. of Transportation
 - MD Dept. of Natural Resources
 - MD Dept. of Planning
 - Maryland Military Department
 - Governor's Office of Homeland Security
 - County of Montgomery
 - Maryland-National Capital Park and Planning Commission in Montgomery County
 - Maryland Historical Trust
 - Maryland Historical Trust (Duplicated effort for compliance with Section 106 of the National Historic and Preservation Act)
 - National Capital Planning Commission
 - Metropolitan Washington Council of Governments

- Maryland-National Capital Park and Planning Commission in Montgomery County (Duplicated effort to ensure correspondence)
- *Following responses were received from the public notice. A summary of the responses received and the responses themselves are located in Appendix A of EA. All responses were reviewed and taken into consideration throughout the development of the EA:*
 - Maryland Historical Trust
 - U.S. Field and Wildlife Service – Chesapeake Bay Field Office
 - MD Dept. of the Environment
 - MD Dept. of Planning
 - Maryland-National Capital Park and Planning Commission in Montgomery County (through the MD Clearinghouse)
 - Montgomery County – Office the County Executive
 - Glen Echo Heights Citizens Association – Harold Pfohl
 - Jesse Goodman and Nicole Lurie, 6655 Macarthur Blvd, Bethesda, MD
 - Sumner Village Community Association – Kay Bowman
 - Washington Waldorf School
 - Steven C. Salop and Judith R. Gelman, 6665 Macarthur Blvd, Bethesda, MD
- A Notice of Availability was distributed on 3 June 2011 to inform the public that the draft EA and FONSI were ready for public review. The required 30 day public review period was extended to 33 days due to the July 4 holiday. The comment period on the draft EA and FONSI closed on July 5.
 - *The NOA was advertised in the Washington Post on June 3, 2011.*
 - NOA indicated that the Draft EA and FONSI were available for public review via the internet at <http://www.nab.usace.army.mil/Public%20Notices/Misc.htm> and at the following two local libraries:
 - Montgomery County Library – Bethesda Branch
 - Montgomery County Library – Little Falls Branch
 - Additional – The NOA and the internet link to review the Draft EA and FONSI were provided directly to Glen Echo Heights Community Association (Harold Pfohl) to post on their website.
 - *The NOA was also sent directly to the following agencies as required and to other agencies and individuals who responded to the 12 November 2011 Public Notice:*
 - U.S. Environmental Protection Agency – Region 3
 - U.S. Field and Wildlife Service – Chesapeake Bay Field Office (As required by Section 7 of the Endangered Species Act)
 - National Park Service – National Capital Region
 - Maryland State Clearinghouse, which sent the notice to the following State and local agencies
 - MD Dept. of Housing and Community Development
 - MD Dept. of the Environment
 - MD Dept. of Transportation

- MD Dept. of Natural Resources
- MD Dept. of Planning
- Maryland Military Department
- Governor's Office of Homeland Security
- County of Montgomery
- Maryland-National Capital Park and Planning Commission in Montgomery County
- Maryland Historical Trust
- Glen Echo Heights Citizens Association – Harold Pfohl
- Jesse Goodman and Nicole Lurie, 6655 Macarthur Blvd, Bethesda, MD
- Sumner Village Community Association – Kay Bowman
- Sumner Village Condominiums – Karen Johnson
- Washington Waldorf School
- Steven C. Salop and Judith R. Gelman, 6665 Macarthur Blvd, Bethesda, MD
- *Following responses were received from the Notice of Availability and are available in Appendix A of EA:*
 - Glen Echo Heights Citizens Association – Harold Pfohl
 - Mary Fowler and Larry Galwin, 4974 Sentinel Drive, #102, Bethesda, MD
 - Maryland-National Capital Park and Planning Commission in Montgomery County – Margaret Rifkin
 - Maryland-National Capital Park and Planning Commission in Montgomery County – Rollin Stanley
 - Peter Reinecke, 6107 Ridge Drive, Bethesda, MD
 - National Capital Planning Commission – David Levy & Jeff Hinkle
- The EA and FONSI were finalized on 8 September 2011.
 - *All comments received from the public comment period on the draft EA and FONSI were reviewed and incorporated into the Final EA and FONSI as needed, specifically:*
 - A Transportation Management Plan was prepared and incorporated in to the EA and FONSI.
 - Text was added to the EA demonstrating compliance with several elements of NCPC's Comprehensive Plan for the National Capital: Federal Elements.

Appendix B



Martin O'Malley
Governor
Anthony G. Brown
Lt. Governor

Richard Eberhart Hall
Secretary
Matthew J. Power
Deputy Secretary

October 3, 2011

Mr. David Levy
Director, Urban Design and Plan Review
National Capital Planning Commission
401 9th Street, N.W.
North Lobby, Suite 500
Washington, DC 20004

STATE CLEARINGHOUSE RECOMMENDATION

State Application Identifier: MD20110729-0588

Applicant: National Capital Planning Commission

Project Description: Final Draft Master Plan/Site Development Guide: Intelligence Community Campus: conversion of an existing Federal facility (see MD20110607-0386, and MD20101115-1021)

Project Address: 4600 Sangamore Road, Bethesda, MD 20816

Project Location: Montgomery County

Approving Authority: U.S. Department of Defense

Recommendation: **Consistent with Qualifying Comments and Contingent Upon Certain Actions**

Dear Mr. Levy:

In accordance with Presidential Executive Order 12372 and Code of Maryland Regulation 34.02.01.04-.06, the State Clearinghouse has coordinated the intergovernmental review of the referenced project. This letter, with attachments, constitutes the State process review and recommendation based upon comments received to date. This recommendation is valid for a period of three years from the date of this letter.

Review comments were requested from 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. As of this date, the Maryland Departments of Business and Economic Development, and Natural Resources have not submitted comments. **This recommendation is contingent upon the applicant considering and addressing any problems or conditions that may be identified by their review. Any comments received will be forwarded.** The Maryland Department of Housing and Community Development had no comment.

The Maryland Department of the Environment, the Maryland-National Capital Park and Planning Commission in Montgomery County, and the Maryland Historical Trust stated that their findings of consistency are contingent upon the Applicant taking the actions summarized below. The Maryland Department of the Environment submitted these contingent comments.

Mr. David Levy
October 3, 2011
Page 2

1. If boilers or other equipment capable of producing emissions are installed as a result of this project, the applicant is requested to obtain a permit to construct from MDE's Air and Radiation Management Administration for this equipment, unless the applicant determines that a permit for this equipment is not required under State regulations pertaining to "Permits, Approvals, and Registration" (COMAR) 26.11.02. A review for toxic air pollutants should be performed. Please contact the New Source Permits Division, Air and Radiation Management Administration at (410) 537-3230 to learn about the State's requirements and the permitting processes for such devices.
2. If a project receives federal funding, approvals and/or permits, and will be located in a nonattainment area or maintenance area for ozone, carbon monoxide, or fine particulate matter (pm 2.5), the applicant should determine whether emissions from the project will exceed the thresholds identified in the federal rule on general conformity. If the project emissions will be greater than these thresholds, contact the Planning Division of the Air Quality Planning, Air and Radiation Management Administration, at (410) 537-3240 for further information regarding threshold limits.
3. Any above-ground or underground petroleum storage tanks that may be utilized must be installed and maintained in accordance with applicable State and federal laws and regulations. For demolition, any aboveground or underground petroleum storage tanks that may be on site must have the contents and tanks removed. Contact the Oil Control Program at (410) 537-3442 for additional information.
4. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3318 for additional information.
5. Any contract specifying "lead paint abatement" must comply with Code of Maryland Regulations (COMAR) 26.16.01 – Accreditation and Training for Lead Paint Abatement Services. If a property was built before 1950 and will be used as rental housing, then compliance with (COMAR) 26.16.02 – Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.
6. The proposed project may involve rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please contact James Carroll, Program Administrator, Land Restoration Program at (410) 537-3437.

The Maryland Department of the Environment also included comments concerning water-quality standards. See the attached comments, and a map.

The Maryland-National Capital Park and Planning Commission in Montgomery County addressed issues relating to: transportation management; safe and adequate access to the site; protection of steep slopes; screening of the proposed parking structure, and planning coordination. See the attached letter.

Mr. David Levy
October 3, 2011
Page 3

The Maryland Historical Trust (the Trust) and other involved parties are consulting with the Defense Intelligence Agency to complete the Section 106 review of this undertaking. The Defense Intelligence Agency, and the Trust are negotiating a Memorandum of Agreement to resolve the project's adverse effects on historic properties. See the attached letter.

The Maryland Department of Transportation found this project to be generally consistent with their plans, programs, and objectives, but included these qualifying comments. The Maryland Department of Transportation stated that as far as can be determined at this time this project has no unacceptable impacts on our plans or programs.

The Maryland Military Department, Montgomery County, and the Maryland Department of Planning found this project to be consistent with their plans, programs, and objectives.

Any statement of consideration given to the comments should be submitted to the approving authority, with a copy to the State Clearinghouse. The State Application Identifier Number must be placed on any correspondence pertaining to this project. The State Clearinghouse must be kept informed if the approving authority cannot accommodate the recommendation.

Please remember, you must comply with all applicable state and local laws and regulations. If you need assistance or have questions, contact the State Clearinghouse staff person noted above at 410-767-4490 or through e-mail at brosenbush@mdp.state.md.us. **Also please complete the attached form and return it to the State Clearinghouse as soon as the status of the project is known. Any substitutions of this form must include the State Application Identifier Number. This will ensure that our files are complete.**

Thank you for your cooperation with the MIRC process.

Sincerely,



Linda C. Janey, J.D., Assistant Secretary
for Clearinghouse and Communications

LCJ:BR

Enclosure

cc: Beth Cole - MHT
Mike Paone - MDPL
Tammy Edwards - DBED
Hara Wright-Smith - DHCD
Nichol Conley - MDOT*

Joane Mueller - MDE
Greg Golden - DNR
Lawrence Leone - MILT

Greg Ossont - MTGM
Cathy Conlon - M-NCPPCM
Steve Allan - MDPL

Proposed Intelligence Community Campus Master Plan

Maryland Department of the Environment - Science Services Administration

REVIEW FINDING: R1 Consistent with Qualifying Comments
(MD2011 0729-0588)

The following additional comments are intended to alert interested parties to issues regarding water quality standards. The comments address:

A. Water Quality Impairments: Section 303(d) of the federal Clean Water Act requires the State to identify impaired waters and establish Total Maximum Daily Loads (TMDLs) for the substances causing the impairments. A TMDL is the maximum amount of a substance that can be assimilated by a waterbody such that it still meets water quality standards.

Planners should be aware of existing water quality impairments identified on Maryland's 303(d) list. The Project is situated in the Potomac River MO Cnty watershed, identified by the MD 8-digit code 02140202 which is currently impaired by several substances and subject to regulations regarding the Clean Water Act.

Planners may find a list of nearby impaired waters by entering the 8-digit basin code into an on-line database linked to the following URL:
<http://www.mde.state.md.us/programs/Water/TMDL/Integrated303dReports/Pages/303d.aspx>.

This list is updated every even calendar year. Planners should review this list periodically to help ensure that local decisions consider water quality protection and restoration needs. **Briefly, the current impairments that are relevant to the Project include the following:**

Potomac River MO County (02140202):

Nutrients:	Non-tidal. A TMDL is under development.
Sediment:	Non-tidal. A TMDL is under development.
Toxics:	Non-tidal. A TMDL for PCBs is pending development.
Biological:	Non-tidal. A TMDL is pending development.

B. TMDLs: Development and implementation of any Plan should take into account consistency with TMDLs developed for the impaired waterbodies referenced above. Decisions made prior to the development of a TMDL should strive to ensure no net increase of impairing substances. TMDLs are made available on an updated basis at the following web site:

ADD 01/07/29-0788

Stormwater

The project should consider all Maryland Stormwater Management Controls. Site Designs should consider all Environmental Site Design to the Maximum Extent Practicable and "Green Building" Alternatives. Designs that reduce impervious surface and BMPs that increase runoff infiltration are highly encouraged.

Further Information:

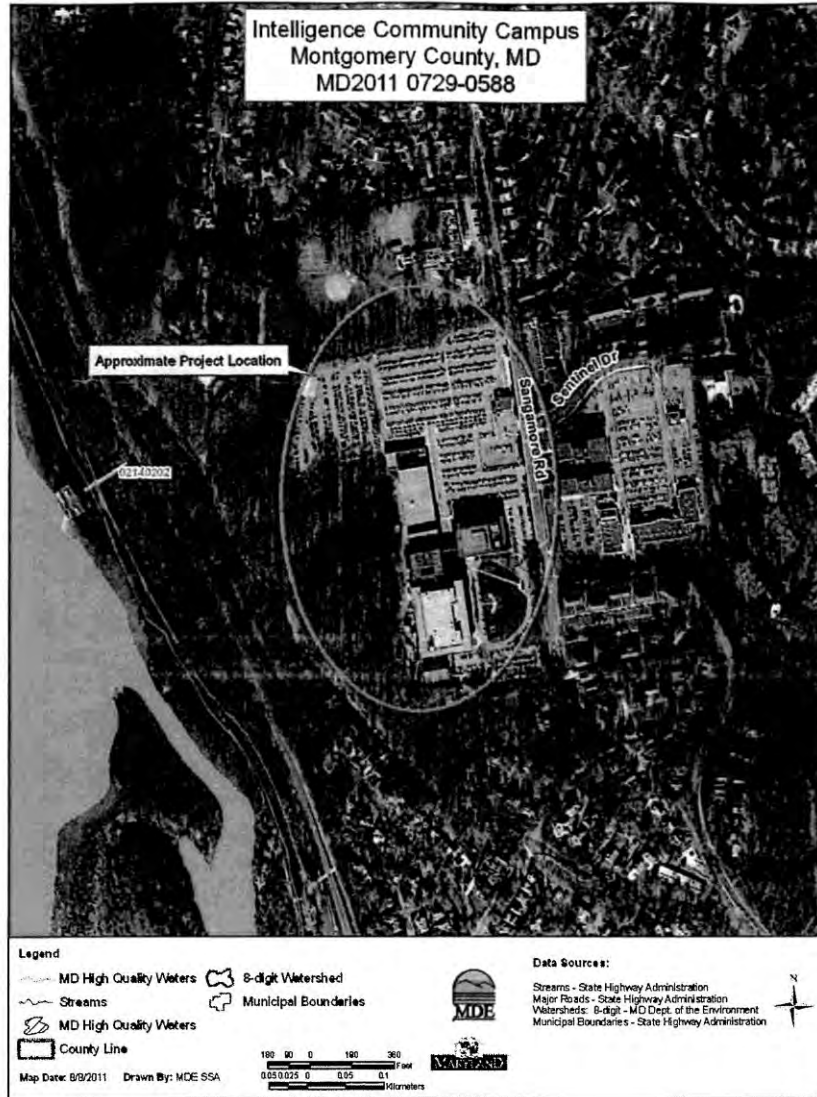
<http://www.mde.state.md.us/programs/Water/StormwaterManagementProgram/Pages/Programs/WaterPrograms/SedimentandStormwater/swm2007.aspx>

Environmental Site Design (Chapter 5):

<http://www.mde.state.md.us/programs/Water/StormwaterManagementProgram/MarylandStormwaterDesignManual/Documents/www.mde.state.md.us/assets/document/chapter5.pdf>

Redevelopment Regulations:

<http://www.dsd.state.md.us/comar/comarhtml/26/26.17.02.05.htm>



7

MD20110929-0588



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

OFFICE OF THE CHAIR

September 30, 2011

L. Preston Bryant, Jr., Chairman
National Capital Planning Commission
401 9th Street, NW, Suite 500
Washington, DC 20004

RE: Intelligence Community Campus – Bethesda, Site Development Guide
Final Draft May 21, 2011

Dear Chairman Bryant:

At our regular meeting on September 22, 2011, the Montgomery County Planning Board conducted a public hearing and completed its advisory review of the Site Development Guide for the Intelligence Community Campus-Bethesda, 4600 Sangamore Road, Bethesda, Maryland. The Commissioners voted 4-0 to transmit comments to the National Capital Planning Commission for consideration at the upcoming public hearing on the project which is scheduled for October 6, 2012. Those present at our meeting, in addition to myself, were commissioners Amy Presley, Casey Anderson and Marye Wells-Harley. The Commissioners heard public testimony from members of the community at that time, as well as from our staff and Department of the Army staff. Please consider this letter and the following comments as the Montgomery County Planning Board's testimony and recommendations for the official record.

1. *Revise the Draft Transportation Management Plan provided August 31, 2011, to include additional strategies to achieve the National Capital Planning Commission's (NCPC) recommended maximum of 1 parking space for every 1.5 employee.*
2. *Ensure that access into and out of the site at the new entrance on Sangamore Road is safe and adequate for pedestrians, bicyclists, and vehicles. Ensure that adequate vehicular, bicycle and pedestrian access is maintained for residents of nearby neighborhoods to exit their neighborhoods, paying particular attention to those who access Sangamore via Sentinel Drive and those who live directly across from the proposed new entrance and may have heightened problems entering and exiting their community as a result of the new traffic pattern. Verify that any traffic studies being done account for those residents and for the traffic patterns related to the nearby elementary school. In addition, consider providing good bicycle and pedestrian access between the site and nearby trails, such as the C&O Canal Trail, the Capital Crescent Trail and the Little Falls Trail. To achieve these aims, work with the agencies that have jurisdiction, such as the Montgomery County*

A handwritten signature in black ink, appearing to be the name of the chairperson.

L. Preston Bryant, Jr.
September 30, 2011
Page Two

10020110929-0588

Department of Transportation, the Montgomery County Parks Department, the National Park Service, and the State Highway Administration.

3. *Minimize the disturbance of the forested steep slopes near the proposed location of the new parking structure.*
4. *Screen views of the new parking structure from the adjacent Sangamore Local Park. Coordinate with the Montgomery County Parks Department (part of the M-NCPPC) to provide additional trees and shrubs along the shared northern boundary.*
5. *Submit site and landscape designs for mandatory referral review for each phase of the project. At that time, address consistency with the development standards in the zoning ordinance and, in consultation with the neighboring communities, the compatibility of the design with the community character. Include:*
 - *Massing, articulation and materials of the visible buildings;*
 - *Landscape design to include the proposed fence;*
 - *Streetscape design subject to approval of the Montgomery County Department of Transportation;*
 - *Setbacks and screening of views from the residential property to the south.*

The Montgomery County Planning Board appreciates the opportunity to participate in this advisory review and to assist in the resolution of outstanding issues. We look forward to receiving more detailed site and landscape designs for Phases One and Two of this project.

Sincerely,



Françoise M. Carrier
Chair

Enclosures:

Staff Report for 9/22/2011 M-NCPPC Public Hearing
Correspondence

cc: Jeff Hinkle, National Capital Planning Commission
Linda C. Janey, JD, Assistant Secretary for Clearinghouse and Communications
Bob Rosenbush - Clearinghouse Contact
Larry Eastman, Chief, Planning and Environmental Services Branch
Department of the Army
Major Rich Wulff
Mr. Michael Schuster, Project Manager, Department of the Army

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Maryland Department of Planning
Maryland Historical Trust

Martin O'Malley
Governor

Anthony G. Brown
Lt. Governor

Richard Eberhart Hall
Secretary

Matthew J. Power
Deputy Secretary

September 7, 2011

Mr. Lawrence D. Eastman, Chief
Planning and Environmental Services Branch
U.S. Army Corps of Engineers, Baltimore District
P.O. Box 1715
Baltimore, Maryland 21203-1715

Re: Intelligence Community Campus – Bethesda (ICC-B)
National Geospatial-Intelligence Agency (NGA), Sumner Site
Montgomery County, Maryland
State Clearinghouse No. MD20110729-0588 / MD20110607-0386
Section 106 Review

Dear Mr. Eastman:

Thank you for your recent letters regarding the above-referenced undertaking and its effects on historic properties. We also received notification of the final draft Master Plan/Site Development Guide for the project through the Maryland State Clearinghouse for Intergovernmental Assistance. The Maryland Historical Trust (Trust), Maryland's State Historic Preservation Office, reviewed the submitted materials pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. We offer the comments presented below and look forward to working with all involved parties to successfully conclude the undertaking's Section 106 review.

Project Description: The undertaking entails the development of an Intelligence Community Campus on the existing site of the National Geospatial-Intelligence Agency (NGA) Sumner Site in Bethesda, Maryland. Plans for the ICC-B facility encompass demolition, alterations to existing buildings, and new construction to address anti-terrorism, force protection, structural engineering, and other tenant security requirements. The project will also include associated infrastructure, landscaping, and parking improvements.

Identification of Historic Properties: Previous investigations conducted by the NGA, in consultation with the Trust, had identified and determined that the Sumner Site (M: 35-134) is eligible for inclusion in the National Register of Historic Places as part of the Army Map Service Historic District (M: 35-133 & 134). The district is significant under Criteria A and C for its association and role as a leader in military mapping during World War II. The Sumner Site includes two contributing resources, Erskine Hall and the Flagpole/Globe Memorial located within the semi-circular lawn east of Erskine Hall. As noted in our prior correspondence dated November 22, 2010, prior archeological investigations demonstrated that the Sumner Site has been extensively disturbed and does not contain National Register eligible archeological resources.

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Larry Eastman
Intelligence Community Campus – Bethesda (ICC-B)
September 7, 2011
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For the current undertaking, the Corps conducted additional efforts to identify any other historic properties that may be affected by the project. The Corps' recent letter to the Trust, dated July 28, 2011 and received by the Trust on July 29, 2011, submitted Determination of Eligibility (DOE) forms for the following four buildings that were not evaluated for eligibility as part of the prior study of the Sumner Site: Albert Hall, Maury Hall, Roberdeau Hall, and the Emory Building. Trust staff carefully reviewed the submitted forms to assess the building's eligibility for the National Register as contributing resources to the historic district and as individual properties. The Trust found that the four building mentioned above have served as the focus of military mapping efforts since WWII and contribute the district National Register eligibility. We have recommended in the MOA as mitigation that the Army Map Service Historic District's period of significance be expanded to include the Army's involvement in the research and production of increasingly accurate and sophisticated cartographic resources since WWII. As the sole site of this nationally important and ongoing research, the district's more recent development would very likely meet Criteria Consideration G for exceptional significance.

Assessment of Effects: The Corps' recent letter, dated July 22, 2011 and received by the Trust on July 26, 2011, provided the Trust with the Corps' assessment of the undertaking's effects on historic properties. Based on the information provided, the Trust concurs with the Corps' determination that construction of the undertaking will have adverse effects on the Sumner Site, a contributing resource to the Army Map Service Historic District, due to the proposed alteration and demolition of the district's contributing resources.

The undertaking's area of potential effects also includes several adjacent properties listed in the National Register of Historic Places: George Washington Memorial Parkway / Clara Barton Parkway (M: 35-061), C&O Canal National Historical Park (M: 12-46), and the Washington Aqueduct (M: 29-49). We agree with the Corps' assessment that the undertaking will have no adverse effect on these resources, since the new facility will be visually screened by existing intervening tree buffer. We would appreciate receiving copies of any comments the Corps received from the National Park Service regarding the undertaking and its effect on these properties.

The Corps' July 22, 2011 letter included a draft Memorandum of Agreement (MOA) the Corps prepared to resolve the undertaking's adverse effects on historic properties. Trust staff carefully reviewed the draft document and we agree with the basic substance of the proposed avoidance and mitigation measures. We have prepared a revised draft MOA which incorporates our suggested revisions (see attachment). Some of the comments will impact the MOA attachments please make sure they are revised to reflect the current agreement. We have forwarded an electronic copy of the revised MOA to your staff to facilitate preparation of the final document for signature. Based on the comments of the other consulting parties, additional modifications to the agreement may be needed. Please provide us with copies of any additional comments the Corps received from the other parties.

We await further coordination with the Corps and other consulting parties to conclude the Section 106 review of the undertaking, execute the MOA, and consult regarding implementation of its terms. If you have questions or require further assistance, please contact Amanda Apple (for historic built environment) at 410-514-7630 /

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Larry Eastman
Intelligence Community Campus – Bethesda (ICC-B)
September 7, 2011
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MD20110729-0588

aapple@mdp.state.md.us or Beth Cole (for archeology) at 410-514-7631 / bcole@mdp.state.md.us. Thank you for your cooperation and assistance in completing the Section 106 review of this undertaking.

Sincerely,



J. Rodney Little
Director / State Historic Preservation Officer
Maryland Historical Trust

JRL/EJC/ARA/201102954
Attachment – Revised Draft Memorandum of Agreement (MOA)

cc: Scott Watson (Corps of Engineers)
Jeff Hinkle (NCPC)
Matt Virta (NPS - GWMP)
Sam Tamburro (NPS C&O Canal)
Kenneth Hartman (Montgomery Co.)
Scott Whipple (M-NCPPC/Montgomery Co.)
Bob Rosenbush (MDP)

Appendix C



OFFICES OF THE COUNTY EXECUTIVE

Isiah Leggett
County Executive

November 30, 2011

Timothy L. Firestine
Chief Administrative Officer

Mr. L. Preston Bryant, Jr., Chairman
National Capital Planning Commission
401 9th Street NW, Suite 500
Washington, DC 20004
Via Email: info@ncpc.gov

Dear Mr. Bryant:

I am writing regarding plans to redevelop the site on Sangamore Road in Bethesda, Maryland, that has been vacated by the National Geospatial-Intelligence Agency (NGA) under Base Realignment and Closure (BRAC). The U.S. Army Corps of Engineers (USACE) is managing the project that will redevelop the site as the Intelligence Community Campus-Bethesda (ICCB).

One year ago the County Executive's office provided comments on the Environmental Assessment (EA) prepared by USACE for this project. At that time, we were satisfied with assurances that the existing buffer between facilities on the site and the neighboring community would be preserved and expanded. At the same time, we urged USACE to incorporate enhanced storm water management practices in the redevelopment.

I have become aware of new issues and concerns as design and engineering for the new ICCB have progressed. In particular, I am concerned that impacted neighborhoods have not received information on enhanced design and engineering in a timely manner. The addition of a multi-level garage on the campus may have far greater impacts on the tree buffer than was evident in the year-old EA. There are additional concerns about storm water management that persist, and that proposed changes in traffic patterns were not properly coordinated with local decision-making transportation agencies or with the Community.

Having said this, I am pleased that in recent weeks USACE has reached out to local Community and Government stakeholders, including the County Executive's office, to seek to resolve these issues. It is essential that this outreach continue and that USACE be as transparent as possible without compromising the ICCB's important mission and security needs.

Thank you for giving me this opportunity to comment on the redevelopment of the Sangamore Road site in Bethesda. Developing this project as much as possible in partnership with the Community will in the long run serve the USACE and the resulting ICCB as a Community Member. Please feel free to reach out to my office in the future on this matter.

Sincerely,

Timothy L. Firestine
Chief Administrative Officer

Appendix D



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101

IN REPLY REFER TO
L1425

Major Rich Wulff
Real Property Services Field Office
Baltimore District, U.S. Army Corps of Engineers
10 South Howard Street
Baltimore, MD 21201

RE: Geospatial Intelligence Agency / Intelligence Community Campus – Bethesda

Major Wulff:

We appreciate the opportunity to provide our comments and concerns related to the proposed Intelligence Community Campus – Bethesda (ICC-B) on the former Geospatial Intelligence Agency site. This letter documents the concerns of and potential impacts of the proposed undertaking on two National Park Service (NPS) sites. George Washington Memorial Parkway (GWMP) and C&O Canal National Historical Park (C&O Canal NHP) are units of the National Park Service that have been historically impacted by operations on this site and will continue to be directly impacted by the proposed redevelopment. To date, the U.S. Army Corps of Engineers (ACOE) has not adequately addressed our concerns regarding runoff and viewshed issues from the proposed redevelopment.

NPS, through GWMP, administers the property immediately adjacent and downhill from the existing Geospatial Intelligence Agency site. GWMP also administers the Potomac Heritage Trail and other parklands across the Potomac River within the viewshed of the ICC.

NPS, through C&O Canal NHP, administers the property further downhill from the ICC and immediately adjacent to the Potomac River, including the historic canal and associated infrastructure.

We write this letter primarily as a concerned neighbor. However, we are further compelled to question the presented plans because of the enabling legislation of GWMP and the C&O Canal NHP. Moreover, NPS finds the nature of these plans is somewhat in opposition to the approved and adopted Bethesda-Chevy Chase Master Plan (April 1990) (the “Master Plan”).

The United States Congress has provided the protection of the Gorge of the Potomac and the scenic vistas of the Maryland Palisades through the enabling legislation of our two parks owned by the American people and administered by the NPS. The enabling legislation for GWMP is the Capper-Cramton Act of 1930 (46 Stat. 482). The Capper-Cramton Act charges GWMP with the “protection and preservation of the natural scenery of the Gorge and Great Falls of the

Potomac.” GWMP includes the Clara Barton Parkway that is listed on the National Register of Historic Places as a part of the GWMP National Register nomination. We believe the construction of the proposed parking garage could threaten the views from these historic sites.

The Chesapeake and Ohio Canal Development Act of January 8, 1971 (Public Law 91-664), imparted the C&O Canal NHP with a legislated mission “to preserve and interpret the historic and scenic features of the Chesapeake and Ohio Canal.” Again, we believe the construction of the proposed parking garage could threaten the views from these historic sites.

More importantly, we are concerned about runoff from the ICC-B site, which has previously damaged resources that we are charged by Congress to protect. At GWMP, the hillside tract between the ICC-B site and MacArthur Boulevard is already filled with washouts and outfalls that have been created by the existing Geospatial Intelligence Agency. This water and sediment damages parkland on the slope, passes under and over MacArthur Boulevard and further damages parkland by the Clara Barton Parkway. The storm flow is deposited along the C&O Canal NHP property by the Potomac River, where large sediment plumes appear at outfalls along the canal.

In addition to the enabling legislation above, NPS believes this proposed redevelopment is in opposition to the approved Master Plan for Bethesda-Chevy Chase area of the county. The Master Plan called for the preservation and protection of the top of the Potomac Gorge from the type of development requested by the ACOE in the form of this garage (Master Plan 64). As a concerned neighbor singled out by Montgomery County in its Master Plan as an appropriate party to assist the county in preserving the views of the Potomac Gorge for public use, we have a duty to act through this plan as well.

We are asking ACOE to address three major concerns of NPS:

Tree Loss at the Site

We have been unable to ascertain from ACOE just how many trees will be removed as a part of this project. We understand you have not settled on a final plan and design for the garage. However, as each plan is presented there is a wide variation in the expected loss of trees. We would like firm tree loss numbers presented each time a new plan is presented for public comment and review.

Viewshed Concerns / Parking Garage

We would appreciate a reconsideration of the parking garage at the rear of the site and on top of the Gorge of the Potomac. Failing that, we would appreciate consideration of readjusting or burying portions of the garage to preserve the viewshed from GWMP and C&O Canal NHS.

Previous correspondence has noted our support for a “green wall” or other such mitigation on a garage structure. We continue to support these efforts. However, as we have explored this issue further, we have become more concerned about the size and orientation of the garage onsite. We ask the ACOE to insure not just the garage, but the lighting, equipment, and other amenities that go with the garage be shielded from disrupting historic viewsheds.

Storm Water

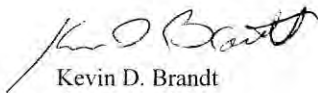
Our deepest concerns relate to the long-standing and ongoing impacts from storm water on national park resources. We are requesting ACOE maintain or manage 100% of the storm water onsite. In addition, we are asking for ACOE, as a part of this project, to restore the severe erosion channels that have been carved into the wooded hillside below the ICC-B outfalls.

In particular, we have found at least one major gully/washout on the southern edge of the property that has severely damaged GWMP land downhill of the existing site. This gully is not natural, and leads directly to an outfall from the ICC site. While we believe this particular outfall has been closed up, the damage is severe. We do not want this to reoccur elsewhere on national park land, and we would appreciate ACOE restoring the parkland to its previous condition.

We are also concerned about the outfall on the northern edge of the property that drains into a natural stream along Wapakoneta Road. This stream is on NPS property, as is Wapakoneta Road, allowed by an easement on the property. NPS is concerned additional runoff would further degrade park resources in the area; additional runoff could also pose a threat to the integrity of Wapakoneta Road. This situation is a safety hazard in and of itself, but emergency repair or replacement of this road could lead to major resource damage, which we must avoid. The best way for ACOE to address these storm water concerns would be to insure 100% of the storm water from the site is not released down the hillside onto NPS property.

Thank you for the consideration of these concerns. We know very well how difficult it can be for a federal agency to meet the needs of all of the stakeholders in a project, especially, when those stakeholders are your neighbors. We believe public processes such as these can strengthen the final product.

Sincerely,



Kevin D. Brandt
Superintendent
C&O Canal National Historical Park



Jon G. James
Acting Superintendent
George Washington Memorial Parkway

Appendix E

DRAFT FOR DISCUSSION WITH DIA: January 22, 2012 9pm

CAVEAT: THIS WAS PRODUCED BY THE WORKING GROUP. WE DO NOT YET HAVE AGREEMENT FROM ALL THE NEIGHBORHOOD ASSOCIATIONS.

Highlighting Color Key:

Yellow Highlight = TBD;

Blue Highlight= Materials needed by Working Group from DIA/USACE before NCPC Meeting

Memorandum of Understanding

This Memorandum of Understanding (MOU) is made and entered into on this _____ day of _____, 2012, by and between the Defense Intelligence Agency (DIA); the US Army Corps of Engineers (USACE); and the neighboring communities listed in Exhibit ___ (Communities). The DIA, USACE and Communities all collectively shall be referred to herein as "the parties."

This MOU is designed to resolve the concerns of the Communities regarding adverse impacts of the redevelopment on: deforestation; water quality; visual, and aesthetic impacts of the size, location, and capacities of the proposed parking garage and stormwater management facilities; impacts on the sensitive geographic area encompassing the Potomac Palisades and contiguous national parks, as noted in the Bethesda-Chevy Chase Master Plan adopted by the M-NCPPC in 1990 and the letter from NPS delivered to USACE on January 10, 2012; adverse environmental impacts of stormwater runoff on the neighborhood, contiguous national parks, and the Potomac River; adverse impacts of traffic congestion; other adverse impacts; possible failure of the USACE's Environmental Assessment for the ICC-B redevelopment project and the Finding of No Significant Impact to comply with the requirements of the National Environmental Protection Act and the Army regulations implementing that statute.

This MOU is designed to permit the DIA and USACE to act as a good neighbor, satisfy the concerns of the Communities, and gain approval of the Amended Site Master Plan from the NCPC without further delay.

This MOU is a good faith attempt by the parties to resolve the Communities' concerns, move ahead with the ICC-B project, and resolve any future concerns in a timely and cooperative manner. The parties recognize that further cooperative efforts will be required to implement a number of the provisions of this MOU and they will endeavor to do so with good faith.

1. **DIA and USACE Agreement.** USACE and DIA agree to comply with all the provisions and restrictions in this MOU. USACE and DIA further agree to attach this MOU or incorporate all the provisions of this MOU into the Amended Site Master Plan (ASMP) and the planning documents for the Phase 1 and Phase 2 plans that are submitted for approval by the National Capital Planning Commission (NCPC) and MDE permit applications. Where there is a conflict between the provisions of the MOU and either the Site Development Plan (Dated X), the Final Environmental Assessment (Dated X), or the ASMP, the provisions of this MOU will be followed.

2. **Communities' Support for Amended Site Master Plan.** The Communities agree to support the USACE and DIA's efforts to gain NCPC approval of the Amended Site Master Plan. **[Amended SMP needed in advance for review]**

3. **No Further Development.** USACE and DIA agree that there shall be no further development of built space beyond that which is depicted in the ASMP (as altered by provisions of the MOU below) for the duration of this MOU.

4. **Occupant.** The DIA will ensure that all the provisions of this MOU will be binding on the agency or agencies that occupy the ICC-B site (Occupant), as well as on DIA and USACE. For purposes of this MOU, references to DIA or USACE will be construed also to include the Occupant.

5. **Monitoring:** The DIA and USACE will report to the parties their progress in complying with the provisions of this MOU in **monthly(?)** meetings and reports during Phase 1 construction.

6. **Duration.** The duration of this MOU will be **50(?) years** or until the redevelopment or demolition of the ICC-B, whichever comes first.

7. **Parking.**

- a. DIA and USACE agree to construct the parking garage in accordance with the ASMP, as indicated in the drawings attached therein, and in a manner consistent with the provisions of this MOU below. **[Exhibit needed for MOU]**
- b. As indicated therein,
 - i. The footprint of the parking garage will have dimensions of approximately **X (381?)** feet by **Y (248?)** feet.
 - ii. The parking garage will have 6 levels of parking.
 - iii. The parking garage will have a capacity not to exceed 1800 parking spaces.
- c. DIA and USACE agree to construct surface parking for uncleared visitors, not to exceed 25 spaces.
- d. As indicated in the drawings in Exhibit __, DIA and USACE agree to locate the garage by moving the southern edge of the parking garage northward from the location shown on the 12 January 2012 USACE Community Brief (posted by the USACE on its website) by approximately **45(?) feet** as a result of reducing the size of the garage below the size and footprint shown in that 12 January 2012 Community Brief. **[Community Brief needed]**
- e. As part of his Phase 1 plan presented to the NCPC, DIA and USACE further agree to evaluate the ability to move the southern edge of the parking garage further northward (beyond the location indicated in the previous paragraph) as far as feasible in order to reduce forest loss on the southern end, taking into account constraints, including those raised by tree buffers and forest loss on the northern and western sides of the garage, denial barriers, entrance slopes, and visual impact on the homes on Wapakoneta Road. The DIA and USACE will review those findings with the parties and the NCPC and relocate the garage if it is reasonable to do so, in light of these constraints.
- f. Upon full occupancy of the site, if an independent traffic engineering study confirms with objective evidence the need for additional on-site parking beyond 1,825 spaces (1,800 in the garage plus 25 visitor spaces) with no undue increase

in traffic congestion and pedestrian safety, then up to an additional 200 surface parking spaces may be added on a non-forested area of the site to accommodate needed parking for 3,000 staff. The study will take into account the effectiveness of reasonable programs to encourage alternative transportation, telecommuting, staggered work hours, and other programs to reduce the need for parking.

8. Forest Conservation.

- a. The existing forest on the site shall be left undisturbed, with the exception of areas noted in Exhibit __, with deforestation limited to less than 0.20 (?) acres. The limit of disturbance of the west side of the site shall be restricted to the area indicated on this Exhibit. In accordance with this Exhibit, no specimen trees (i.e., more than 30" dbh) shall be cut on the site. An inventory of all large trees (i.e., more than 6" dbh) to be cut also shall be indicated on Exhibit __. [TBD] [Exhibit(s) needed for MOU]
- b. A reverse berm of 10-15' in elevation will be constructed along and including the current western edge of the parking lot. Existing trees on and adjacent to the berm will not be disturbed. Evergreen trees that are tall and dense upon maturity – preferably native, such as spruce, or a combination of species – shall be planted on the berm along the entire western side of the garage. DIA and USACE shall discuss the choice of trees and locations with the community in advance. Trees shall be at least 12-14' tall at the time of planting. They shall be planted as soon as possible after completion of the parking garage construction and at a time of the year that is optimal for survival and shall be replaced if they do not survive.
- c. A green screen shall be installed on the parking garage as soon as feasible after completion of the construction of the garage.
- d. Permanent SWM Facility (Northwest side of the site): No deforestation or tree-cutting shall occur for a permanent stormwater facility on the northwest side of the site, as indicated in the site drawing Exhibit __. [TBD. [Exhibit needed for MOU]

- e. Permanent SWM Facility (near the Southeast corner of the garage): Tree-cutting for a permanent stormwater management facility near the southeast corner of the garage shall be reduced to the minimum extent feasible. Any tree-cutting for this stormwater management facility shall be shown on Exhibit __. **[TBD] | Exhibit needed for MOU**
- f. Temporary SWM Facility: No large trees shall be cut for any temporary stormwater management facility. **[TBD]** Any tree-cutting for this stormwater management facility shall be shown on Exhibit __. Tree-cutting shall be reduced to the minimum extent feasible to mitigate visible impact. The area of tree cutting will be restored immediately after construction by planting trees of height 12-14 feet at planting. **[Exhibit needed for MOU]**
- g. Rest of the Site: No trees will be cut anywhere else on the site related to the construction and operation of stormwater management facilities.

9. **Traffic.**

- a. DIA shall participate in a Joint Traffic Committee (JTC), along with representatives from the Communities and the Montgomery County Department of Transportation. DIA agrees to permit the new occupant for former NGA facilities on MacArthur Blvd to join the JTC.
- b. The DIA and Occupant shall provide an accessible "community liaison," who will serve as Occupant's designated point of contact to traffic and transportation issues. The community liaison will be a member of the JTC.
- c. The JTC will monitor, analyze and evaluate the traffic congestion and pedestrian safety impacts of the ICC-B site and the NAVFAC-administered sites at the former NGA facilities on MacArthur Blvd. This analysis and evaluation will include alternative transportation and other programs of the Occupant to decrease the need for additional surface parking; traffic, transportation, and pedestrian safety issues, with the goal of limiting the off-site impacts on the broader community, including nearby roads (i.e., Sangamore Rd., MacArthur Blvd., and other area streets and transportation routes).

- d. The JTC also will participate in the planning and evaluation of any independent traffic study designed to determine the need for additional surface parking spaces.
- e. DIA shall undertake an enhanced shuttle program, incentives for van/carpooling, incentives for bicycle and pedestrian commuting, employees' rules, and any additional policies and measures needed to ensure that employees and visitors will not park off-site in the neighborhood and to minimize the need for additional surface parking spaces. The JTC will monitor and improve these programs.
- f. DIA shall instruct employees that they may not commute on Brookes Lane.
- g. To avoid local congestion at the entrance to the site, inspectors and inspection lanes shall be added as necessary to ensure that queued vehicles will not back up on Sangamore Road.

10. Stormwater Management

- a. DIA and USACE shall provide an overview and the details of stormwater management plans for the site (including the complete revised MDE permit application packages) to the Communities and NCPC in a timely manner before the NCPC meeting for Phase 1 approval for their review and comment.
[Assumption: This will not all be available in time for Feb NCPC meeting.]
- b. DIA and USACE shall have as a goal that 100% of stormwater on the site will be retained. If 100% retention is not possible, the site will retain stormwater to the maximum feasible extent.
- c. Stormwater retention shall include the construction of one or more cisterns to capture stormwater for reuse on the site. Some captured stormwater will be used in a grey water system and the rest will be used to maintain plantings on the site. The community understands that USACE's feasibility study of stormwater capture and reuse systems is not yet complete. DIA shall review the design studies and the results of the feasibility capture and reuse analysis with community leaders and the NCPC in a timely manner, enabling them to review and comment.

- d. DIA and USACE shall have as a goal that any stormwater released from the site be treated before its release. If 100% retention of stormwater is not possible, the site's stormwater management capacities and treatment systems shall be increased significantly beyond those needed for a 10-year storm to the 25-year storm level in order to improve protection for the national parks. **[TBD with NPS and DIA/ACE]**
 - e. Historical erosion and sedimentation: USACE and DIA shall remediate historical erosion and sedimentation problems on the site as part of the ICC-B redevelopment project. USACE and DIA shall work with NPS, the Department of Defense, the U.S. Congress, Montgomery County, and the Communities to obtain funds to be used to correct off-site historical erosion and sedimentation problems.
 - f. DIA and USACE shall work in cooperation with NPS and the Communities to correct off-site historical erosion according to standards and designs developed by NPS.
- 11. Lighting, Noise, and Electromagnetic Emissions.**
- a. All lighting on the site shall be such that minimal light spills out of the property boundary.
 - b. There shall be no lights on the top level of the parking garage.
 - c. The amount of light emitted from the garage will be minimized to the extent feasible. [There shall be no ceiling lights in the garage.]. **[TBD]**
 - d. Screening (preferably natural, such as a planted berms) shall be provided to minimize the impact of vehicle lights on adjoining neighbors.
 - e. There shall be no helipad at the ICC-B site.
 - f. Noise from denial barriers and other security devices shall be minimized.
 - g. DIA and USACE will not permit the emission of any electromagnetic (or other) signals that interfere with neighborhood electronic devices or jeopardize applicable public health standards.

Communities

Glen Echo Heights Citizens Association
The Civic League of Brookmont and Vicinity
Sumner Citizens Association
Ft. Sumner Civic Association
Brooke's and Locust Lane Civic Association
Cabin John Civic Association
Sumner Square Civic Association
Sangamore Court Town Homes
Sumner Village Community Association

Appendix F



DEPARTMENT OF THE ARMY
BALTIMORE DISTRICT, U. S. ARMY CORPS OF ENGINEERS
P. O. BOX 548
ANNAPOLIS JUNCTION, MD 20701

REPLY TO
ATTENTION OF:

January 19, 2012

Real Property Services Field Office

Mr. Jim K. Tracy, PE
Chief, Plan Review Division
Sediment and Storm Water and Safety Program
Water Management Administration
Maryland Department of the Environment
1800 Washington Street
Baltimore, MD 21230

RE: MDE Permit Application MDE#11-SF-0359

Dear Mr. Tracy:

We appreciate the opportunity to meet with your staff yesterday in regards to the pending MDE review and approval of the Storm Water Management Plan for the North Campus of the Intelligence Community Campus – Bethesda (ICC-B) project located in Montgomery County. We appreciate the opportunity in allowing the construction team to provide details of how the project has progressed in recent months.

As discussed in your offices on January 18, 2012, there have been modifications to the design as originally presented in the MDE application documents. The USACE intends to modify the erosion and sediment control plan as well as the SWM plan to reflect revisions that have been approved by the Owner, the Defense Intelligence Agency (DIA). These approved changes to the design of the project are the result of extensive coordination and engagement with local civic groups, as well as state, federal and county officials and agencies. The general focus of the public input (as it pertains to this permit application) has been to reduce/minimize tree removal, reduce overall disturbed area, and reduce view shed impacts. Attachment one shows the original garage location as it relates to our submitted permit. Attachment two is the revised garage size and location presented to you yesterday which was approved by the DIA. The DIA has also made a final commitment this morning to further reduce the garage footprint from the approved drawing by one additional bay which is shown as the red hatched area on Attachment two. As you can see by comparing the attachments, the USACE/DIA have heard and incorporated the public's input into our design and greatly reduced the impacts of the construction regarding tree removal, overall limits of disturbance, and view shed impacts.

2

The current contractual obligation with the awarded Design-Build Contractor for the project, Clark Construction, requires that the USACE provide the initial approved MDE Storm Water Management (SWM) plan based on the original design and layout of the North Campus Project as reflected in the project bid documents. Once this approval is obtained and provided to Clark, any and all changes or modifications to the approved plans are the responsibility of Clark Construction. USACE will be directing Clark Construction to incorporate the design changes as reflected in the rotated, shifted, and reduced garage (Attachment two) and submit to the MDE for a modification to the approved MDE permit. There will be no construction and/or tree removal until the revised plan is provided by Clark and approved by MDE. Unfortunately, the design modification process cannot commence until the USACE meets its contractual obligation of providing the initial MDE approval.

We respectfully request that, assuming the current MDE application MDE#11-SF-0359 meets MDE compliance, the approval be released to the applicant with the understanding that there will be no construction and/or tree removal until the modification is submitted to and approved by MDE. It is our intent to direct Clark to complete this modification in a two step process. Step one would be the design submission from Clark to the MDE requesting a modification to the sediment and erosion control permit based on the reduced LOD. Once Clark Construction has obtained the revised and approved sediment and erosion control plan from MDE, construction activities would commence in accordance with said revised MDE permit, and as always, successful completion of an on-site meeting with the MDE Inspector. Step two would be a request for modification by Clark of the SWM plan based on the revised layout, which will maintain the same spirit and methodology as reflected in the current plan, with adjustments.

We appreciate your cooperation in this matter as we strive to revise this permit to reflect the reduced environmental impact as coordinated with the community at large. Questions may be directed to the Corps of Engineers Project Manager Mr. John Malloy at 443-654-7207.

Thank you for your cooperation and immediate attention to this request.

Sincerely,



Jared W. Olsen, PE, PMP
Deputy Chief, Real Property Services Field Office
US Army Corp of Engineers



MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Baltimore MD 21230
410-537-3000 • 1-800-633-6101

Martin O'Malley, Governor
Anthony G. Brown, Lieutenant Governor

Robert M. Summers, Ph.D., Secretary

STORMWATER MANAGEMENT AND SEDIMENT & EROSION CONTROL
APPROVAL STATE/FEDERAL PROJECTS

MDE NUMBER: 11-SF-0359

APPROVED BY:

James S. Faith
for Chief, Sediment & Stormwater Plan Review Division

EFFECTIVE DATE: January 23, 2012

IN COMPLIANCE WITH: Environment Article, Sections 4-106 and 4-205 Annotated Code of Maryland

APPROVAL IS HEREBY GRANTED: Defense Intelligence Agency
ADDRESS: Building 6000, Bolling AFB
Washington, DC, 20340-5100
Attn: Mr. Jared Olsen (USACE)

HEREINAFTER KNOWN AS OWNER,
FOR THE PLANS AND SPECIFICATIONS PRESENTED FOR: Contract No. W912DR-10-D-0018-0005

North Campus, 4600 Sangamore Road - Bethesda - Montgomery County
(Also Known as Intelligence Community Campus - Bethesda, ICC-B)

PREPARED BY: Wiley Wilson

PLANS DATED: November 16, 2011

REVISIONS DATED: N/A

This APPROVAL is granted subject to the following conditions:

1. This Approval shall become null and void if the construction authorized herein has not begun within two (2) years from the granting of this Approval. If the construction authorized herein has not been completed within five (5) years from the granting of this Approval, the Approval shall become null and void except that these limits may be extended at the discretion of the Department.
2. The Approval is subject to all laws and regulations now in effect and may be revoked if it is subsequently determined that this authorization violates other laws of the State. Construction shall comply with approved terms.
3. The location and dimensions of all Sediment Control structures, excavation and filling shall be in accordance with plans approved by the Department of the Environment Water Management Administration (MDE/WMA). Owner or authorized agent must obtain written approval from the MDE/WMA for any plan modifications or changes. A copy of the approved plan with any approved modifications and this Approval shall be available at the construction site for reference during the construction period.
4. Off-site borrow or waste sites require local county and Soil Conservation District approvals if they are located on private property or MDE/WMA approval if on State or Federal property. Local approval numbers shall be furnished to the MDE/WMA Inspector.
5. The Owner or his authorized agent shall notify the MDE/WMA Compliance Program at (410) 537-3510, at least seven (7) days prior to initiation of the project and five (5) days after work ends.

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6. Stormwater management is provided as redevelopment with a reduction in impervious area of less than 50%. One (1) bioretention facility is provided. An existing stormfilter vault is relocated, existing cartridges replaced and additional cartridges added for an expanded drainage area. An existing detention vault is utilized within the area. As-builts are required for each structure.
7. An NPDES general permit for disturbance over 1.0 acre is required prior to any earth disturbance.
8. This approval is being provided to allow the next phase of project design, by a different design consultant, to commence in the Design/build process. The next phase of design will produce final construction documents incorporating the rotated, relocated and reduced garage intended to address community concerns related to tree removal. This approval does not authorize the start of any on-site construction. Construction will be authorized once the next phase plans, as described above, have been reviewed and approved by MDE.

JKT/MFL