

STAFF RECOMMENDATION



Hinkle
NCPC File No. MP7257

INTELLIGENCE COMMUNITY CAMPUS—BETHESDA MASTER PLAN

4600 Sangamore Road
Bethesda, Montgomery County, Maryland

Submitted by the United States Army Corps of Engineers

December 1, 2011

Abstract

The United States Army Corps of Engineers, on behalf of the Defense Intelligence Agency, has submitted a draft master plan to redevelop the federal facility at 4600 Sangamore Road in Bethesda, Maryland. The Sangamore Road facility is currently being vacated by the National Geospatial-Intelligence Agency, which is moving to its new headquarters at Fort Belvoir's North Area, in Springfield, Virginia. The master plan provides a vision and framework to transform the facility into a secure campus supporting Defense Intelligence Agency 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 parking garage; and extensive landscaping to replace the site's existing and pervasive surface parking. The master plan accommodates a maximum employee population of approximately 3,000, which is the same number of employees previously located at the site.

Commission Action Requested by Applicant

Approval of master plan pursuant to 40 U.S.C. § 8722(a) and (b)(1).

Executive Director's Recommendation

The Commission:

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, with the exception that the Commission will **defer** action on the siting, design, and alignment of the proposed parking garage and access road until the applicant concludes coordination with the National Park Service, Montgomery County and the community on outstanding issues and finalizes its plans for these elements of the project, as shown on NCPC File Number 72.00(05.00)43308.

Commends the applicant for proposing a development plan that reuses and modernizes an existing, but physically outdated, federally owned facility and for significantly increasing the pervious and landscaped areas at the installation.

Notes that the applicant has agreed to:

- Minimize the disturbance of the forested steep slopes near the location of the proposed parking structure and provide sufficient trees, shrubs, and other landscaping elements to screen views of the parking structure from the adjacent Sangamore Local Park, and submit landscape design plans for each project phase for review by the National Park Service to ensure compatibility with the adjacent National Park.
- Submit building and landscape design plans for each project phase for review by the Maryland-National Capital Park and Planning Commission to ensure compatibility of the design with the community character in the areas of massing; articulation and materials of buildings; landscape design; screening of views from the residential property to the south; and street design, which is subject to approval by the Montgomery County Department of Transportation.
- Work with appropriate county, state, and federal agencies, and the Washington Metropolitan Area Transit Authority to enhance adjacent public transit (bus) services, and to improve off-road bikeway connections to the site from the existing regional trail system.

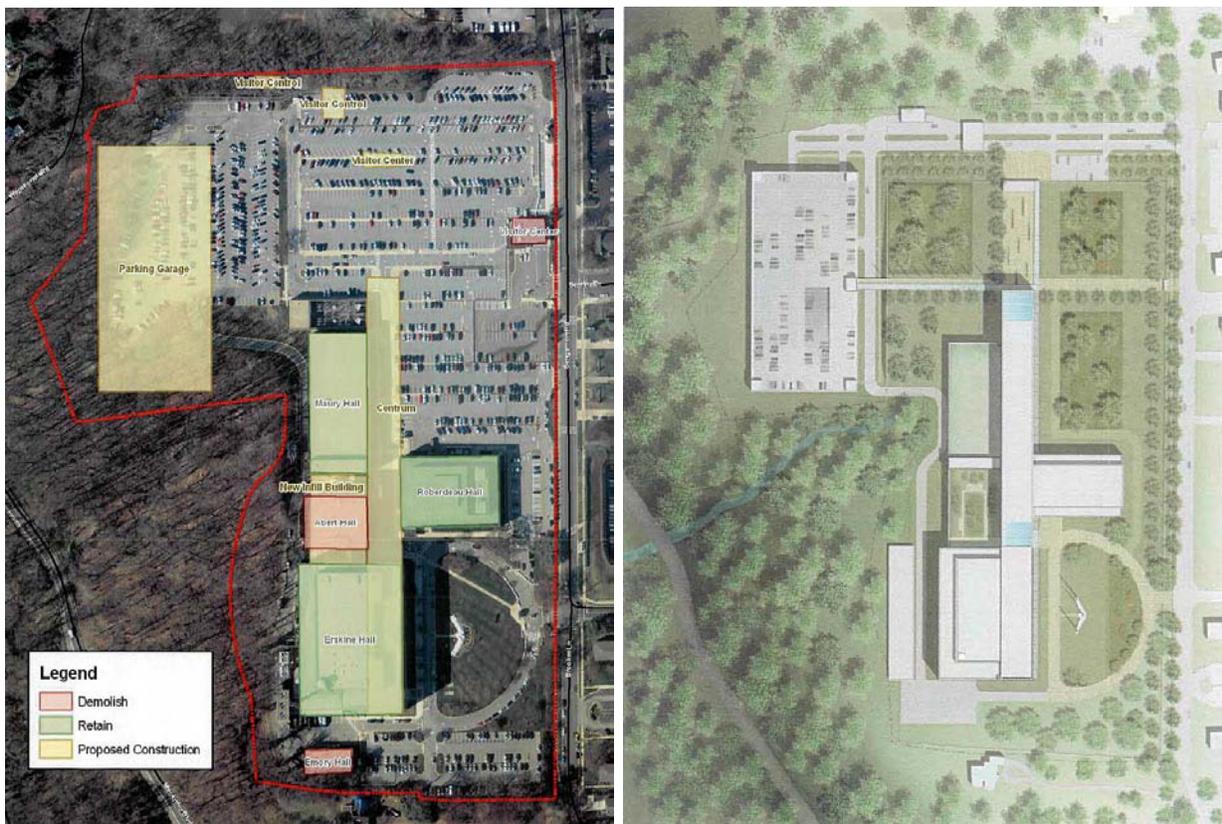
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KEY PROJECT ELEMENTS



Illustrated view of the proposed concept for the Intelligence Community Campus-Bethesda, looking southwest (with Sangamore Road running diagonally across the left side of the illustration)

- Former headquarters of the National Geospatial-Intelligence Agency redeveloped for use as secure campus supporting Defense Intelligence Agency activities
- No change in land area (39 acres) or population (3,000)
- Primary redevelopment includes:
 - Demolition of two (2) existing buildings and construction of two (2) infill buildings; the new buildings will be consolidated with the remaining three (3) buildings into one main structure (increasing gross square feet by 137,800)
 - Demolition of existing visitor center and gate and construction of a new visitor center and gate that provide for improved site access
 - Replacement of extensive surface parking (1,800 spaces) with one garage and a small visitor parking lot (2,240 spaces)
- Redevelopment allows installation to:
 - Provide modern, mission capable space
 - Maximize space utilization, and provide for a safe and secure work environment that meets current Anti-Terrorism/Force Protection requirements
 - Significantly 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

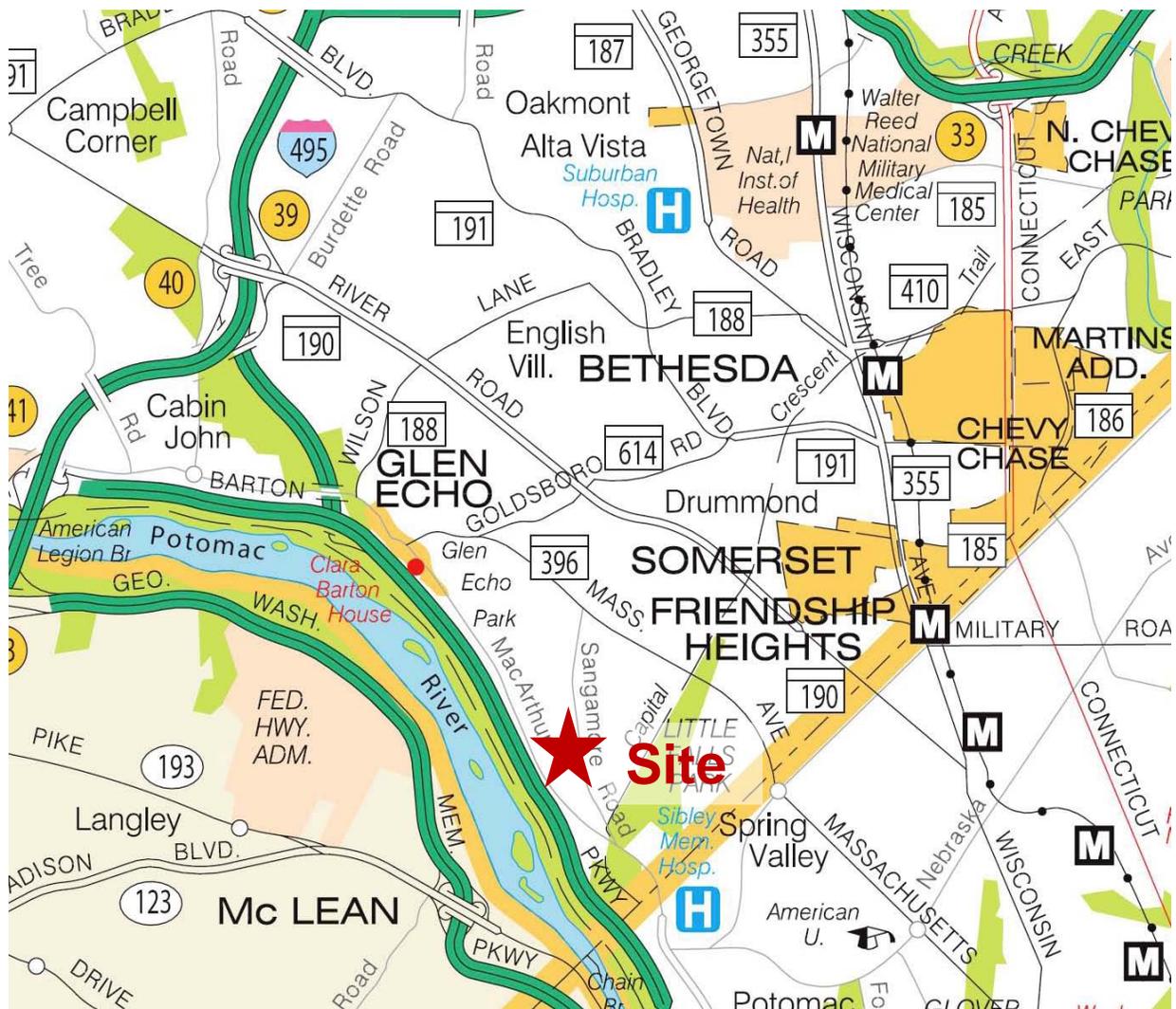


Proposal overlaid upon aerial showing existing conditions (left); illustrated conceptual site plan (right)

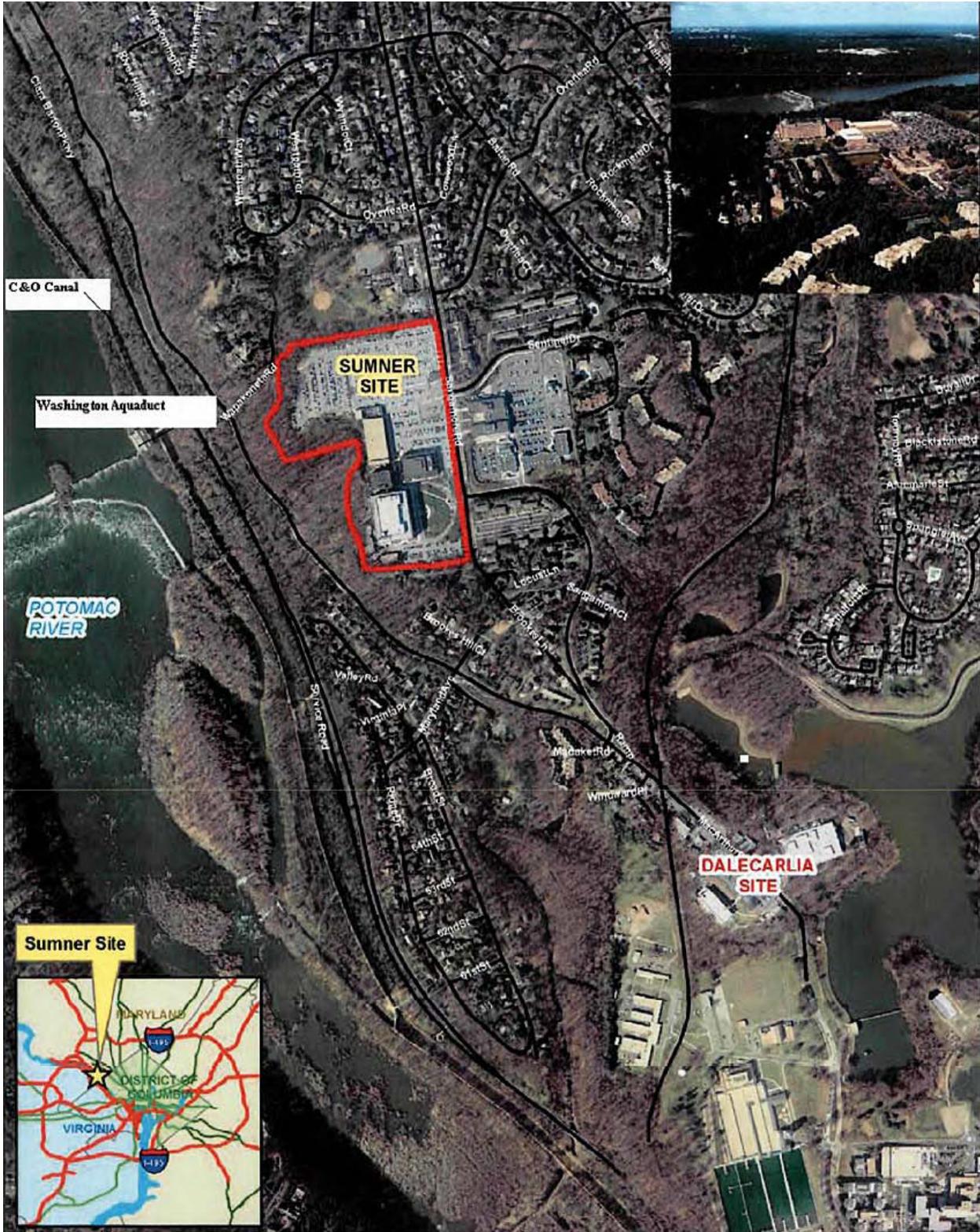
PROJECT DESCRIPTION

Site / Background

As part of the 2005 Base Realignment and Closure Act, the National Geospatial-Intelligence Agency (NGA) is consolidating their operations in the National Capital Region in 2011. As part of this effort, NGA is currently vacating their headquarters facility at 4600 Sangamore Road in Bethesda, Maryland and relocating to Ft. Belvoir in Virginia. In programming this property transition, the United States Army Corps of Engineers (USACE) is evaluating use of the Sangamore Road property for a secure campus, the Intelligence Community Campus—Bethesda (ICC-B), supporting Defense Intelligence Agency activities.



The ICC-B site, on the south side of Sangamore Road in Bethesda, was initially developed during the 1940's and has evolved over the past 70 years to include approximately 39 acres—of which approximately 33 acres are developed. The ICC-B property was originally deeded to the U.S. Government in 1945, during World War II, through a court decree for uses in connection with the Army Map Service Expansion and other public uses.



Aerial of the site and its surroundings

The area of Bethesda surrounding the ICC-B site is a densely-developed, mixed-use area typical of historic growth trends in the National Capital Region. 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 northwest, east, and southeast of the complex. The Clara Barton Parkway within the George Washington Memorial Parkway, managed by the National Park Service, is immediately west of the site. The Washington Waldorf School, a private non-sectarian K-12 school of 265 students, and a 6.7-acre Montgomery County park, the Sangamore Local Park, are located just north of the site. The Sangamore Local Park contains a playground, soccer/baseball field, and two tennis courts. A small wooded park strip with a public trail from Sangamore Road to the park separates the school from the project site.

Significant features adjacent to the site include the river bluff drop of approximately 150 vertical feet at the rear (west side) of the site as the land slopes towards the Potomac River. This topographic relief and associated mature forest is within the George Washington Memorial Parkway and provides a physical and visual buffer between the Potomac River and the site.

Current development on the ICC-B site includes approximately 716,500 gross square feet of structures and 12.5 acres of pavement for on-site vehicle management and parking, including a total of approximately 1,800 at grade personal vehicle parking spaces.



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

The on-site parking for employees has historically been insufficient for times of peak employee use of the site, which often approached 3,000 personnel. Over time the surrounding community developed around the ICC-B and has experienced traffic delays and parking impacts associated with the site operations. These impacts have grown more severe in recent years as on-site

parking has remained limited and access to the site has become more difficult as new security procedures have been implemented. Due to the shortage of on-site parking, employees have been using a significant amount of neighborhood on-street parking, causing negative impacts to the surrounding community.

While the ICC-B complex is screened by trees from adjoining private land uses to the north 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 the surrounding community and the site's employees.

Proposal

The project proposal is to redevelop the ICC-B facility into a secure campus supporting Defense Intelligence Agency activities. The master plan (formally titled the Site Development Guide) is designed to accommodate a maximum employee population of approximately 3,000, which is the same number of employees previously located at the site.

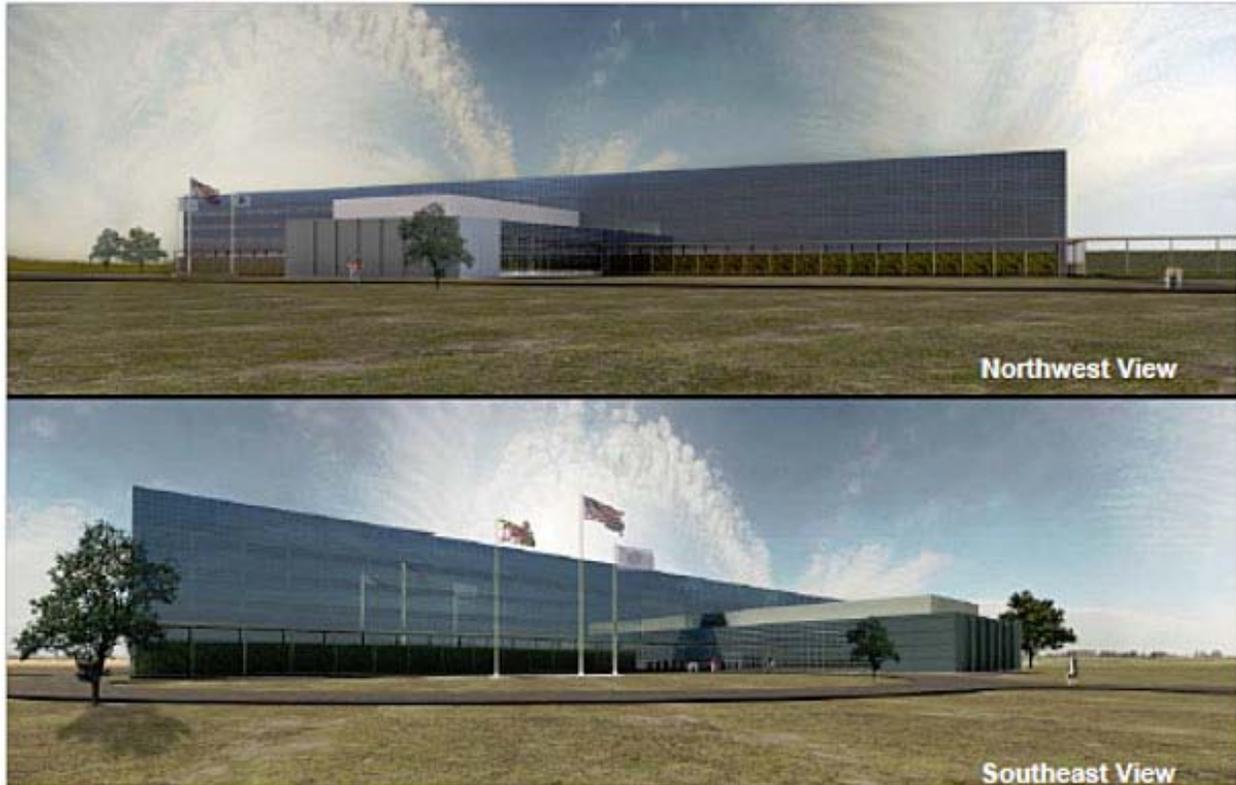


Illustrated view of the proposed concept for the Intelligence Community Campus-Bethesda, looking northwest (the installation continues to front Sangamore Road, which runs diagonally across the right side of the illustration)

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, and 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

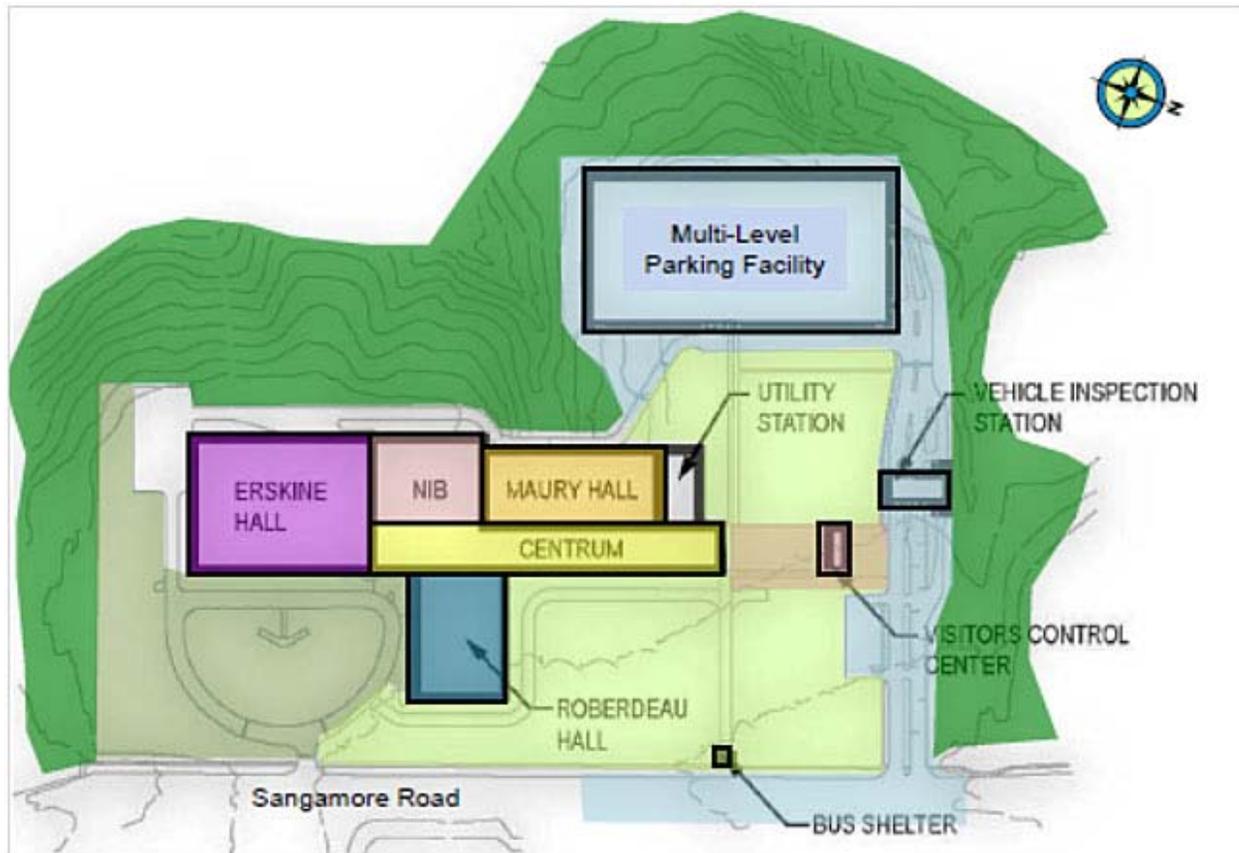
provided on the north side of the Centrum. A new Visitor Control Center will be located immediate north of the new entry. Occupiable space previously allocated to Emory Hall and Abert Hall will be accounted for within the new Centrum and the NIB; the gross square feet will increase from 716,500 to 854,300 (an increase of 137,800).



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. These are the minimum requirements for all Department of Defense buildings, and they apply to new construction and to 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 perimeter and vehicular parking and circulation drives.

Parking at the site will increase from 1,800 spaces to 2,240 (an increase of 440 spaces). 2,000 spaces will be assigned to the 3,000 employees, while the remaining 240 will be available for fleet parking, visitors, and carpool/vanpools. The 2,000 spaces for employees allows for a parking ratio of one space per 1.5 employees, which is within NCPC's recommended goal for suburban installations located away from metro stations. Most parking will occur within a new garage and the existing surface parking eliminated, allowing for nearly a fifty percent reduction of on-site impervious pavement.



Generalized site plan proposed for the installation (Erskine, Maury, and Roberdeau Halls are existing structures; the New Infill Building, or NIB, Centrum, parking facility, vehicle control station, Visitors Control Center, and bus shelter are proposed structures)

As currently proposed, the primary vehicle access point into the installation is 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 will access the installation via a new road and gate (Entry Control Facilities, or ECFs). The new access road will provide on-site queuing space for approximately 40 vehicles, eliminating current entrance queuing on Sangamore Road.

The parking garage is sited in the northwest corner of the installation to maximize open and developable space and minimize its visual presence in the neighborhood. Appropriate Active Vehicle Barriers (AVB) and Passive Vehicle Barriers will provide the required protection for the installation and for the gate users. The Entry Control Facility will be designed to provide the required level of protection in response to the applicable threats. Delivery vehicles to the site will be processed through a new proposed 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.

Staff notes that the applicant is 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, NPS and members of the community have 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 may result in revisions to the siting, design, and alignment of these two components of the project. The status of the applicant's coordination on these issues is more fully discussed in the analysis section of this report and has been taken into consideration in staff's recommendation to the Commission.

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.



Illustrated perspective of proposed concept of the Entry Control Facilities and Materials Control Center (right), parking garage (back, center), and Visitor Control Center (left)

Similar to existing conditions, a new 8-foot-tall anti-personnel fence will be provided around 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 west side (along Sangamore Road). A 30-foot clear zone free of obstructions will be provided on either side of the fence, where possible. The clear zone, to be located entirely within the ICC-B property, will be limited to the north and south of the property due to adjacent

landowners and limited along the western side due to the steep topography. The exact location of the fence and associated security measures will be finalized as individual building projects and landscaping plans are developed for the installation.



Illustrated concept of the bus shelter/personnel access gate proposed for Sangamore Road

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's 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

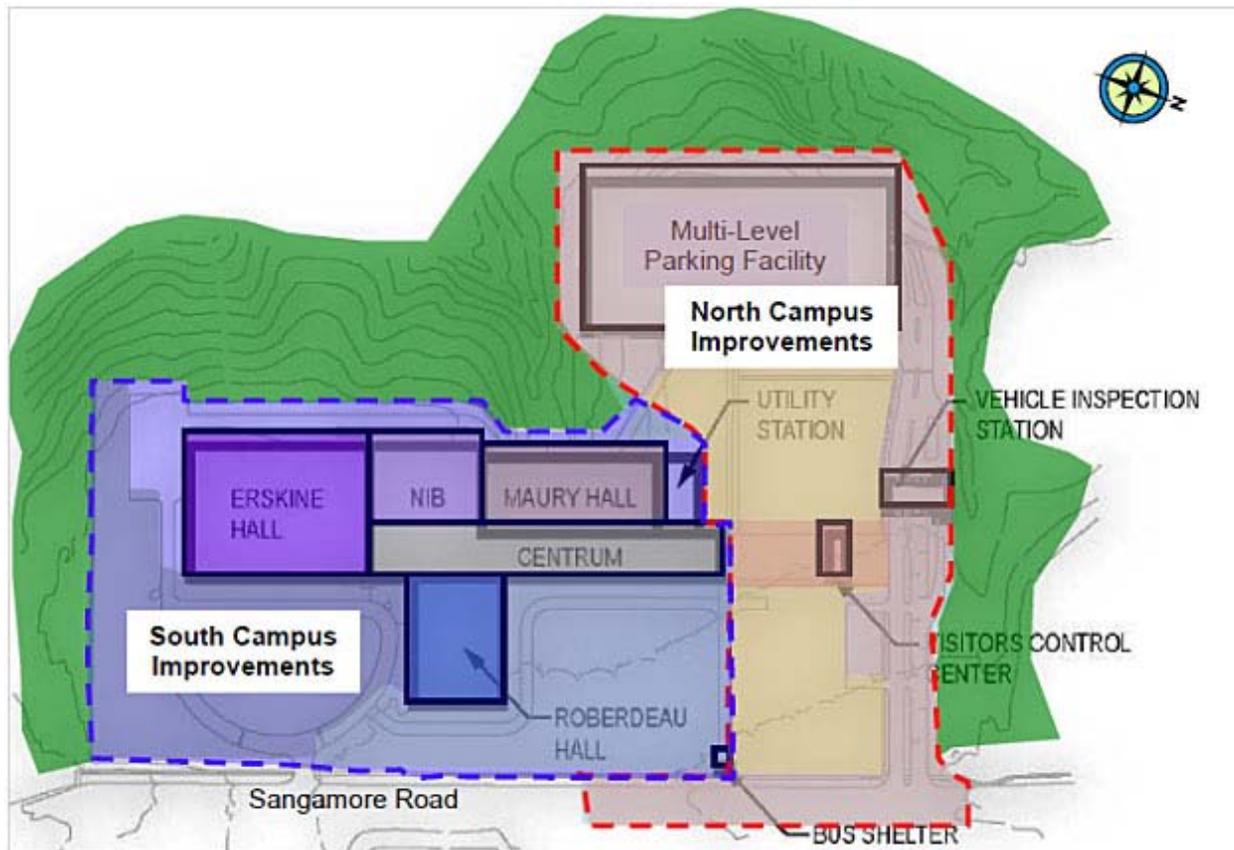
Redevelopment of the installation will be done through design/build contracts and is divided into two phases.

Phase 1 / North Campus:

The first phase to redevelop the installation includes construction of the new parking garage, Entry Control Point, Visitor's Control Center and the access road (elements identified as the north campus in the following figure). A construction period of 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. Construction of phase 2 will take approximately 3-4 after construction of phase 1, with the site fully complete near the end of 2016.



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

PROJECT ANALYSIS

Executive Summary

The reuse and redevelopment of the former headquarters of the National Geospatial-Intelligence Agency in Bethesda, Maryland for activities in support of the Defense Intelligence Agency meets many policy objectives of the Comprehensive Plan for the National Capital as well as many local development objectives, and appropriately reuses and modernizes an existing federal facility. However, as the facility is located in a low density residential area, the applicant should take into consideration the character of the surrounding community during design development of the proposed structures. While the proposal significantly improves the environmental conditions of the installation, mainly through the conversion of existing surface parking to structured parking, the applicant is still working to resolve some outstanding issues raised by NPS, Montgomery County, and the community related to the proposed parking garage and access road. As noted above, the applicant has been, and still is, actively engaged in conversations with these stakeholders to address these concerns through a series of site visits and community meetings that have taken place since the Commission's review of the draft master plan, most recently on November 29, 2011. Specifically, the outstanding issues pertain primarily to the potential 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 main access road on traffic flow along Sangamore Road and access to nearby residential properties. Through discussions with the applicant and the community, staff understands that the results of these discussions will likely

result in modifications to the parking garage and access road as currently depicted in the master plan. **Therefore, staff is recommending that the Commission approve 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, with the exception that the Commission defer action on the siting, design, and alignment of the proposed parking garage and access road until the applicant concludes coordination with the National Park Service, Montgomery County and the community on abovementioned issues and finalizes its plans for these elements of the project.**

These issues, and staff's related recommendations to the Commission, are discussed below under the issue headings of Site design, Community context, Environmental consideration (other than transportation), and Transportation considerations.

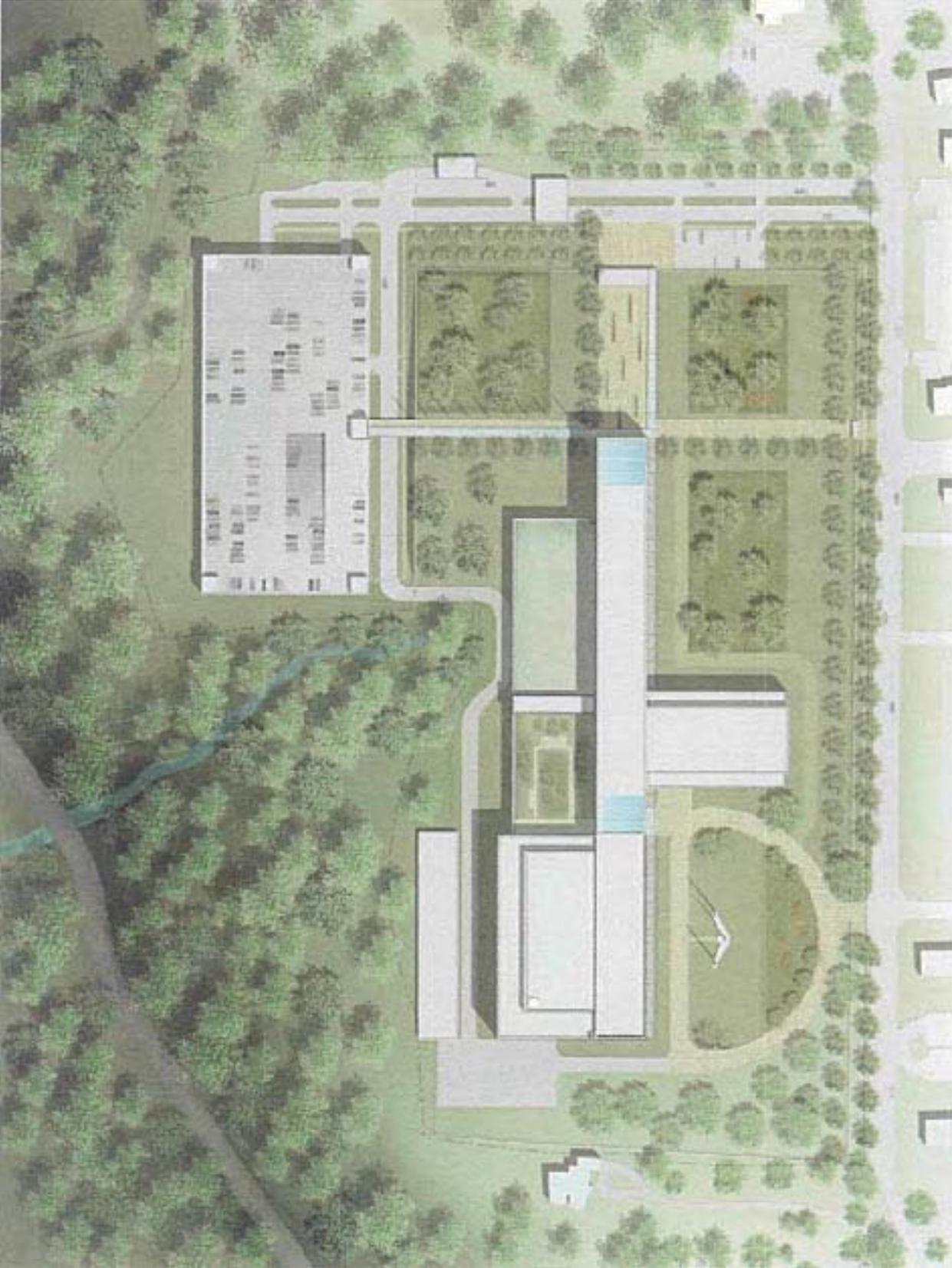
Site design

The federal government 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.



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



Rendered conceptual site plan

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 multi-story parking garage into the back, 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 on-grade parking spaces. Reducing the asphalt footprint will significantly improve water quality emanating from the site and reduce the heat island effect associated with 12.5 acres of site pavement. The proposed parking facility will allow for changing 6 acres of impervious pavement to green space at the front of the site and enhance 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 security checkpoints.

A comprehensive landscaping plan will be developed in conjunction with the proposed facilities to provide an enhanced viewshed from Sangamore Road and break up building masses. This landscaped area will incorporate native species endemic to the region to accentuate connectivity to the adjacent parkland. The new Centrum building will shield a portion of the parking garage when viewed from Sangamore Road, and the elimination of the site's at-grade parking spots will greatly improve the site's character.

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 economically vibrant region, 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 many of Montgomery County's recommendations within its *Bethesda Chevy Chase Master Plan (1990)*, including maintaining the type of federal employment currently proposed at the site, as well as not increasing the number of employees at the site (historically approximately 3,000).

Community context

The site redevelopment is focused on redefining the existing complex to serve the emerging operational and secure space needs of the national intelligence community in the National Capital Region. 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 planning the site includes renewal of facilities that date back over 70 years to serve technical missions for a future 25-year planning horizon. 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.

Other significant 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, including elements of Erskine Hall itself; the requirement to improve setbacks and minimize impacts to adjacent property owners; the shortage of available on-site parking; and the need to connect fragmented building spaces which currently impede team collaboration.



View of existing conditions along Sangamore Road

Redevelopment of the site is focused on incorporating sustainable practices in the renewal of the facilities on 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 in the design to achieve at least a LEED Silver Certification for the development. A core element of the proposed approach to achieve this standard is maximum reuse of the existing facilities on-site. This will include 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 proposed contemporary building envelope with the 70 year old structures. As such, the design proposes to use transitional materials between the older structures and the new buildings. All these structures, however, will be covered with a glass curtain wall system designed to break up the building mass.

Although the Army is making a significant effort to ensure that the architectural and landscape qualities of the redeveloped site are compatible with the sites surroundings, staff continues to recognize that the adjacent residential community is characterized primarily by low-intensity suburban development. As such, staff suggests that the Army continue to work with the community as the site's building architecture advances to ensure that the proposed contemporary scale, massing, and materials are in harmony with the character of the surrounding community. To address this concern, the Army has agreed to continue coordination with NCPC, NPS and M-NCPPC and to submit building and landscape design plans for each project phase for review by these agencies to ensure compatibility of the design with the community character in the areas of massing; articulation and materials of the visible buildings; landscape design to include the proposed fence; setbacks and screening of views from the residential property to the south. The Army must further work with the county to address the proposed streets design (discussed below), which is subject to approval by the Montgomery County Department of Transportation.

Environmental considerations (other than transportation)

The 39-acre site currently consists of a mixture of buildings, parking lots, and landscaped areas and has served as the headquarters for the NGA. Historically, activities at this site have included photoprocessing and printing. With the advancement of digital technology in the 1990s, the use changed to a more administrative complex for approximately 3,000 employees. 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 1,800 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 affects 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 and an underground detention vault north of the proposed parking garage. The proposed site layout will 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. Site grading will be done in such a way as to provide positive drainage away from the buildings and all roadways and parking areas. The design will ensure grading and associated stormwater runoff do not adversely affect surrounding sites, including the adjacent George Washington Memorial Parkway.

In particular, stormwater runoff from the loading docks, entry road, access control point and

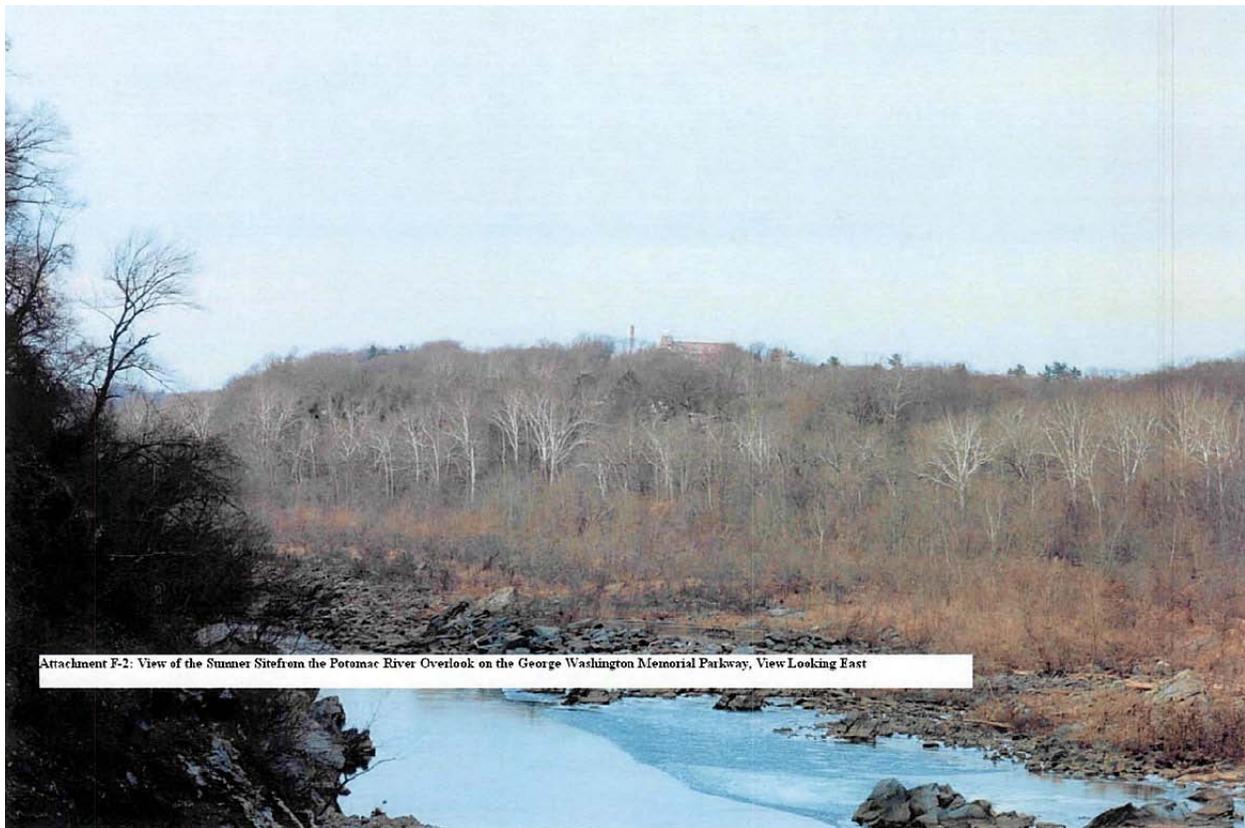
walkways will be collected and routed to bioretention filters. This practice will account for approximately 2 acres of impervious area, which is 10 percent of the existing impervious area. Landscape infiltration will be incorporated into other practices and will account for approximately 3.4 acres of impervious area, which is 17 percent of the existing impervious area. Stormwater runoff from the parking structure will be collected and routed to a detention structure at the north end of the structure. The detention facility will outfall into the existing ephemeral stream that follows the north boundary of the site. The existing stream has been badly eroded and will require restoration of the banks along the length that is currently receiving parking lot runoff from the site. The stormwater management plan will follow Maryland Department of the Environment (MDE) guidelines and require MDE approval. USACE will continue its coordination with the NPS on the stormwater issue and implement storm water controls consistent with its MDE permits.

Of particular concern to Montgomery County 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."

Due to the need to provide adequate distance from the gate facilities and the main buildings for security purposes, the proposed location of the parking garage may impact the wooded land along the western portion of the site. However, the location of the garage as depicted in the Environmental Assessment and Site Development Guide is a conceptual level design. The garage's final size and exact location will be determined as phase 1 is designed. USACE is working 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. USACE is also working to pull the property fence line as close to 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 fence line.

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 NPS property and local neighborhoods. For example, the use of 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, will not be affected (although any potential effect the proposed garage may have is still to be determined as its design progresses). 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.



View of the site from across the Potomac River, at an overlook located on the George Washington Memorial Parkway. No structure will exceed the current height of Erskine Hall, which is minimally visible above the trees.

Tree protection areas in the vicinity of proposed excavation will be established to preserve those locations and prevent injury. Disturbed areas would be temporarily seeded following construction, and permanently seeded when growth is more likely to establish itself.

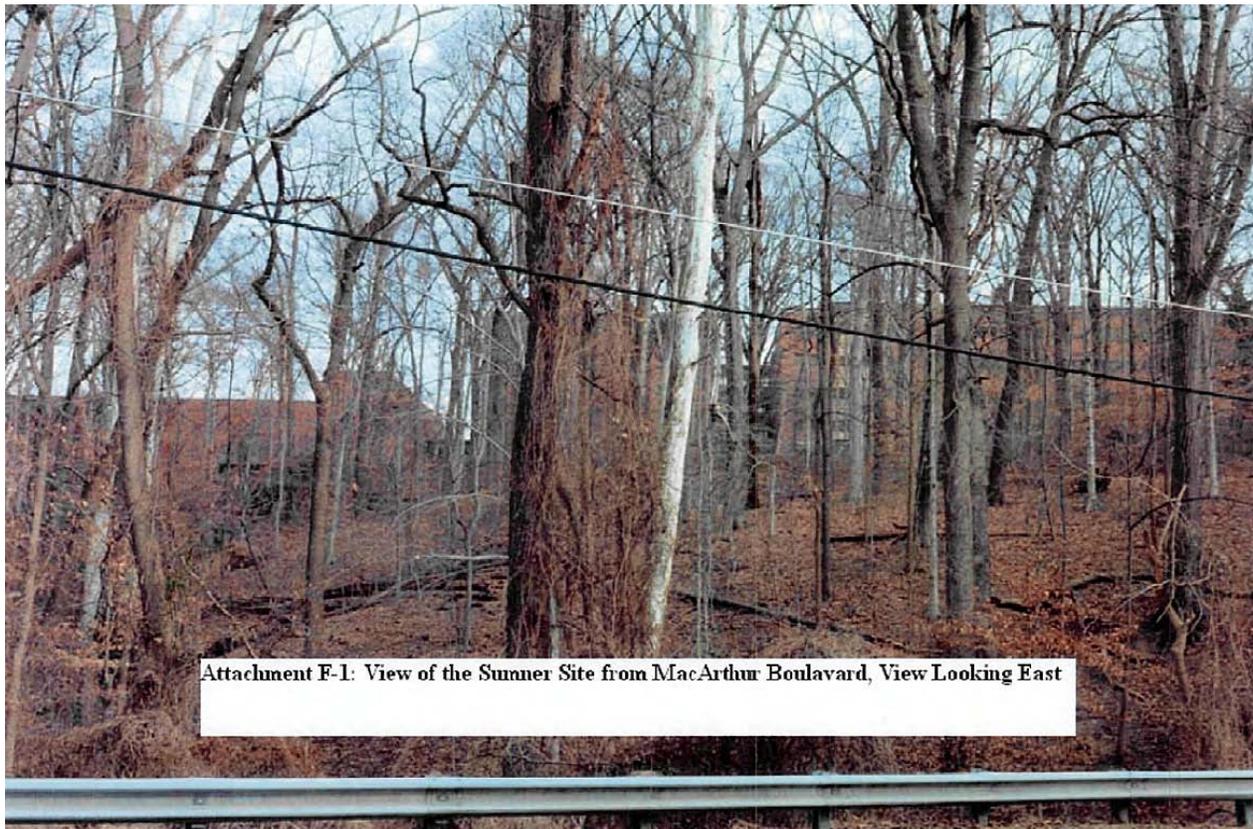
Landscaping will be constructed in accordance with UFC 3-201-02, *Landscape Architecture* and all applicable LEED requirements. The Army will also complete a Forest Conservation Plan, as required by the Maryland Forest Conservation Act, which will include a map and narrative describing how existing forested 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.

Because the drainage of stormwater, which has historically been a site problem, is adequately addressed in the proposal, and other environmental considerations will be improved, staff recommends that the Commission commend the applicant for significantly increasing the pervious and landscaped areas at the installation.

While the Army's proposal to use green walls to screen the garage from adjacent properties is commendable, the garage as currently shown in the master plan may still negatively impact many existing trees adjacent to the garage site. In addition, the size, design, and location of the garage structure may also have a negative visual impact on the adjacent residential neighborhood and Sangamore Local Park to the north. As reflected in staff's recommendation, to address these concerns the Army has agreed to continue coordination with NCPC, NPS and M-NCPPC and to submit landscape design plans for each project phase for review by these agencies to address these concerns. Staff appreciates the applicant's commitment to continue working with interested stakeholders to resolve remaining issues related to the parking garage.

With regard to how the applicant's ongoing discussions with stakeholders relates to the Commission's current review of the master plan, as staff has noted above, the result of these conversations will likely result in modifications to the siting and design of the garage structure. Therefore, in staff's judgment the most prudent approach is to defer action on the proposed parking structure until the applicant can conclude its coordination with NPS, Montgomery County and the community and finalize its plans for the proposed garage.



Attachment F-1: View of the Summer Site from MacArthur Boulevard, View Looking East

Existing view of the site from MacArthur Boulevard during winter

Transportation considerations

The installation currently provides a total of 1,800 parking spaces for employees, the disabled, motorcycle, government vehicles, reserved, emergency vehicles, short-term and visitor uses. A total of 2,240 parking spaces are proposed, with 2,000 provided for general employee parking, approximately 40 reserved for fleet parking, and the remaining 200 reserved for visitors. With a

proposed maximum number of 3,000 employees, the number of future designated employee spaces falls within the recommended Comprehensive Plan guideline of 1:1.5, based on the site's suburban location beyond 2,000 feet of Metrorail. The increase in on-site employee parking is a direct result of the site's historical problem of not having sufficient on-site parking, resulting in significant off-site employee parking within the neighborhood, which has been a source of community concern throughout the past several years and which presented additional security risks for site employees given the sensitive nature of intelligence community work that occurs at the site. In addition, telecommuting, flex-time and work-from-home alternatives are not a viable option for this site due to mission security and interagency operational integration requirements. Personnel at this site are subject to high variability in workload and operating on fixed alternate schedules to alleviate traffic concerns is not a feasible alternative for site employees.

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 the optimal level of service for the final site layout. The design details of the realigned access road are still being discussed and analyzed by the applicant and the community. Staff appreciates the efforts the applicant is making to address the community's concerns regarding potential impacts of the proposed access road on traffic flow along Sangamore Road and access to nearby residential properties. Similar to what staff is recommending for the proposed parking garage, because these discussions are still ongoing and are likely to result in modifications to the design and alignment of the main access road compared to what is currently shown in the master plan, staff is recommending that the Commission defer action on the proposed access road until the applicant can conclude coordination with Montgomery County and the community and finalize its plans for this component of the project.

The Army will continue its discussions with Montgomery County and the community and to provide and refine traffic data that assists in further identification of potential impacts at other intersections in the surrounding area (however, the Army notes that this redevelopment cannot pay for, construct, or otherwise make capital improvements associated with "down-stream" intersections and that responsibility for those actions are entirely within the purview of the MC-DOT.

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 acres of existing at-grade site parking into a 3-acre parking facility
- 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 minimizing 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:

- Accentuating pedestrian-friendly attributes of site access. This will include improving safety and functionality of pedestrian connections to the site including the regional trail system and enhancing street crossings. Potential street crossing enhancements will include provision of intermediate refuge areas in conjunction with new turn lanes, improved illumination and delineation of crossing areas, additional signage and improved transitions at site entrances.
- Promoting 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).
- Providing 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.
- Publishing and continually promoting 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.

- Promote home ownership within 10 miles of the site through posting of local real estate listings and links to housing agencies that provide local area relocation assistance.
- 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.
- Implement a no-idling policy for parked or vehicle loading/unloading to curb emissions.
- 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.
- Track vehicle entry times and adjust work reporting times to equalize traffic loads on 20 minute intervals during peak periods to reduce congestion and traffic idling time as consistent with site mission requirements.

Because the facility is being 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 conjunction with any Phase 2 submissions to NCPC.

In response to these recommendations, the Army provided to staff a final 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 NCPC 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).

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.

As planning and the future operation of the site goes forward, the Army has agreed to continue to work with the appropriate county, state, and federal agencies, and the Washington Metropolitan Area Transit Authority to enhance adjacent public transit bus services to the site, and to improve off-road bikeway connections to the site from the existing regional trail system.

CONFORMANCE

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 sustainment of the economically vibrant region, 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 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 reviewed the master plan for the ICC-B within an Environmental Assessment 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 insure 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.

CONSULTATION

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 C.

A summary of the Army's coordination effort associated with the proposal's Environmental Assessment and FONSI is also attached as Appendix A. The Army has also recently been involved in a number of public meetings to discuss the proposal, and has provided a summary of public comments received through these discussions and the Army's responses. This is attached as Appendix B.

APPENDIX A: USACE Coordination Summary

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 Galowin, 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: USACE Summary of Public Comments and Responses

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

REPLY TO
ATTENTION OF

CENAB-RS-E

17 Nov 2011

MEMORANDUM FOR RECORD

SUBJECT: Summary of public comments and responses to ICC-B Master Plan and EA

1. The purpose of this memorandum is to consolidate and summarize public comment on the Intelligence Community Campus – Bethesda project to date, and provide the current USACE response/direction.
2. USACE is currently maintaining project specific documents on the Miscellaneous Public Notices section of the Baltimore District's webpage - <http://www.nab.usace.army.mil/Public%20Notices/Misc.htm>.
3. Summary of Actions:
 - a. NEPA / EA / FONSI – complete
 - b. MOA with MDSHPO (Section 106-NHPA) - complete
 - c. Coordination with NCPC, M-NCPPC, and Montgomery County - ongoing
 - d. Public meeting, 5 October 2011 hosted by the Glen Echo Heights Citizens Association
 - e. Interaction/meetings with Montgomery County / Community Leaders (10 & 22 November 2011)
 - f. Public meeting scheduled for 29 November 2011
4. Construction Phasing:
 - a. Phase 1 – “North Campus” – Parking Garage, Visitor Control Center, Vehicle Inspection Station, Site improvements. Contractor is Clark Construction, and completion is expected in January 2013.
 - b. Phase 2 – “South Campus” – Includes demolition of Abert & Emory, construction of the Centrum, unification of the building façade, interior renovations, and site improvements. Contractor is not yet selected, and completion will likely be 3-4 years beyond Phase 1 completion.
5. Summary of public comments and responses:
 - a. The proposed location of the Parking Garage and development of the site calls for the removal of wooded areas (particularly in the northwest portion of the site), is inconsistent with M-NCPPC's

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SUBJECT: Summary of public comments and responses to ICC-B Master Plan and EA

Bethesda/Chevy Chase Master Plan, and unnecessarily impacts the M-NCPPC park and Wapakoneta Road neighborhood.

Response: The location of the garage as depicted in the EA and Site Development Guide is a conceptual level design – final size and exact location are subject to further, more detailed design. The proposed location of the garage reflects a balance of multiple considerations, including the new entrance design and queuing capacity, building codes and security requirements, site circulation (including life-safety access considerations, road geometry, and access to the west side of the buildings), site slope and grading requirements, and utility impact. As indicated in the EA and Site Development Guide, the height of the garage will be limited in order to minimize view-shed impacts, and will feature a vegetative green-screen to further reduce impact.

As a result of the substantial feedback on this subject, USACE is working 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.

- b. Clear-zones along the proposed fence-lines require the removal of trees/wooded areas.

Response: Security requirements dictate the need for “clear space” on both sides of the security fence and within the site property line. The final location of the fence and associated clear area will take into account, and minimize to the extent possible, the impact on existing trees/wooded area.

- c. Storm-water management must be improved.

Response: Storm-water management will be significantly improved by the site redevelopment. USACE will ensure the project complies with the Maryland Department of the Environment permits. This process ensures proper erosion and sediment control measures during construction, as well as responsible storm-water management after construction and during site operation. Upgraded/improved storm-water management features are planned, and will be incorporated within specific construction phases as permitted by MDE.

- d. Storm-water damage to National Park Service land adjacent to the site must be “repaired”.

Response: The National Park Service is aware of this project, and in its correspondence to USACE, has not asked for any restoration effort on its land. USACE will continue its coordination with the NPS and implement storm water controls consistent with the MDE permits. USACE cannot spend funds to repair damage not located on the project site.

- e. The Traffic Impact Study is insufficient, and the proposed new entrance and removal of stop-signs along Sangamore Road (at Sentinel Dr.) will lead to congested, unsafe conditions.

Response: USACE and MC-DOT have, and will continue to work together to ensure traffic and transportation impacts are identified and mitigated. The current traffic impact study includes some information that is potentially not fully explained. The following items are provided for clarification: This redevelopment includes only the Sumner site (4600 Sangamore Rd), however the Sumner site and the Delcarlia site (6000 MacArthur Blvd) were both previously occupied by NGA. The Delcarlia site had approximately 400 parking spaces, and portion of the employees that worked on the Sumner site

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SUBJECT: Summary of public comments and responses to ICC-B Master Plan and EA

actually parked at the Delcarlia site. Additionally, NGA received significant comment/complaint from the community about employees parking on the roads within the community as well as the retail establishment across Sangamore. A specific example of this can be found in the public comment during the Environmental Assessment that consolidated NGA (then NIMA) at the campus in 2001. In the simplest terms, the redevelopment attempts to strike a balance between maximizing onsite parking to alleviate these concerns, yet remain in compliance with the parking ratio goals established within NCPC's Comprehensive Plan for the National Capital. The "44%" increase mentioned in the traffic study represents a conservative scenario specifically for increased traffic from Sangamore Rd into the site entrance based on increased number of parking spaces on the site; it does not represent a 44% increase of overall traffic into the area and surrounding intersections (for example, Massachusetts and Sangamore). The proposed new entrance at the northern portion of the site and recommended removal of the stop-signs at Sentinel Dr. was derived in an effort to maximize the Level of Service for through-traffic along Sangamore Rd.

After discussions with MC-DOT, it was determined that stop-signs would remain at Sangamore and Sentinel 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 the optimal level of service for the final site layout. This deviation from the current concept design (as presented in the EA and Site Development Guide) will be incorporated in to the final site plan, and will likely be constructed during the Phase 2 / South Campus portion of the redevelopment.

This redevelopment cannot pay for, construct, or otherwise make capital improvements associated with "down-stream" intersections; responsibility for those actions are entirely within the purview of the MC-DOT. USACE will continue to work with MC-DOT to provide and refine data (such as impacts associated with disjoining the Sumner and Delcarlia sites' connection) that assists in further identification of potential impacts at those intersections.

f. NGA normal work times did not necessarily coincide with neighborhood peak-traffic periods. Will this remain the same?

Response: NGA, within its mission requirements, attempted to adjust/allow flexibility with working hours as much as possible to minimize traffic impacts on the local community. The planning factors for the new facility include modeling traffic and employee arrival and departure times to match those of NGA.

g. Wording within the EA and Site Development Guide seem to indicate further site growth and plans for future construction and expansion after this project.

Response: There are no plans for future expansion. The Site Development Guide details the planning factors for this project, including plans to accommodate no more employees than when NGA was at the site.

h. What measures are being taken to reduce traffic impacts associated with the redevelopment?

Response: The revised Transportation Management Plan was completed on November 9, 2011. The primary goal of this plan is to reduce single-vehicle ridership, and includes such measures as: the

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SUBJECT: Summary of public comments and responses to ICC-B Master Plan and EA

encouragement of bicycle ridership with the inclusion of bike racks and shower facilities, encouragement of car/van pools, and the establishment of a site shuttle to the Metro.

i. What sustainable/Green features are planned for the redevelopment?

Response: Sustainable design is a significant consideration for this redevelopment. In addition to removing significant portions of impervious pavement and redesigning the storm-water management for the entire site, the project will achieve a minimum U.S. Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Silver rating. Additionally, the Visitor Control Center will achieve not only LEED Gold certification, but will also be "Net-Zero" energy consumption.

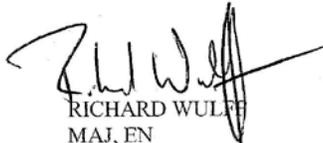
j. Will operations at the site interfere or degrade mobile phone reception, wireless internet connections, or other types of communications?

Response: No.

k. Can a new entrance from McArthur Blvd. be established in order to alleviate traffic concerns along Sangamore Rd.?

Response: This option is not being pursued for the following reasons: The land that borders the site to the west where such an entrance could be designed is owned and maintained by the National Park Service; The slope between the site and MacArthur Blvd is severe, and would likely require substantial impact to the forested area; this impact would be inconsistent with measures being taken in paragraph 5.a. (above) and Maryland-National Capital Parks and Planning Commission's recommendations (directed to NCPC, dated 30 September 2011).

6. The Point of Contact for this memorandum is the undersigned at richard.wulff@usace.army.mil or (443) 654-7208.



RICHARD WULFF
MAJ, EN
Project Manager

APPENDIX C: MD State Clearinghouse Recommendation



Maryland Department of Planning

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
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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

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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:

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1.0204/0729-0588

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>



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AD 2011 0929-0588



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*

L. Preston Bryant, Jr.
September 30, 2011
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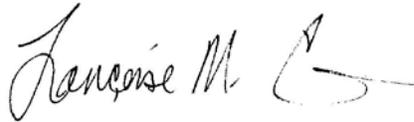
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Department of Transportation, the Montgomery County Parks Department, the National Park Service, and the State Highway Administration.

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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MD 20110929-0588

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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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

IRL/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)