Executive Director's Recommendation
Commission Meeting: May 2, 2013

PROJECT
Intelligence Community Campus – Bethesda (South Campus), Centrum
Intelligence Community Campus - Bethesda (MP7257)
4600 Sangamore Road
Bethesda, MD

SUBMITTED BY
United States Department of Defense, Army Corps of Engineers on behalf of the Defense Intelligence Agency

REVIEW AUTHORITY
Federal Project in the Environs
Per 40 U.S.C. 8722(b)(1)

NCPC FILE NUMBER
7326

NCPC MAP FILE NUMBER
3101.10(38.00)43762

APPLICANT'S REQUEST
Preliminary approval of site and building plans

PROPOSED ACTION
Approve with comments

ACTION ITEM TYPE
Staff Presentation

PROJECT SUMMARY

The United States Department of Defense, Army Corps of Engineers, on behalf of the Defense Intelligence Agency, has submitted preliminary site and building plans for the ICC-B (South Campus), Centrum. The project is the first phase of the redevelopment of the ICC-B South Campus. The Centrum will provide campus-wide amenities, additional office space, and, most importantly, serve as the main circulation spine that ties together three existing buildings into one common, interconnected complex for use by the United States Intelligence Community. As currently designed, the Centrum has a building footprint of approximately 40,500 square feet and consist of approximately 225,000 gross square feet on four, above-ground levels plus a full basement. The height of the Centrum building will rise 60 feet above grade to the building parapet. The project incorporates sustainable stormwater management strategies such as micro-bioretention areas, a green roof, and a cistern for capturing and reusing runoff for internal building system needs, and has been designed to meet federal stormwater requirements under Section 438 of the Energy Independence and Security Act of 2007 and the state requirements contained in the *Maryland Stormwater Guidelines for State and Federal Projects*.

KEY INFORMATION

- The Centrum project is the first phase of the ICC-B South Campus redevelopment.
- The Centrum will be a four-level, 220,000 gross square foot structure that will provide several campus amenities, tenant office space, and serve as the central circulation spine for the ICC-B.
- The Centrum is part of an overall South Campus architecture and campus-wide landscape concept that the applicant has developed to help guide the remaining build out of the ICC-B.
- The project is not inconsistent with the Federal Elements of the Comprehensive Plan for the National Capital.

- The project employs environmental site design (ESD) strategies such as micro-bioretention areas, a green roof, and a cistern to manage stormwater runoff within the project's area of disturbance.
- The project exceeds applicable federal and state stormwater management regulations.
- Staff is recommending that the applicant consider modifications to the following: the overall height, massing, and location of the Centrum rooftop penthouses; the Wellness Garden; the size/capacity of the micro-bioretention areas, green roof, cistern; and selection of paving materials.
- The Defense Intelligence Agency and the National Park Service are in the process of developing a Memorandum of Understanding that will address pre-existing offsite erosion and sedimentation issues on adjacent National Park Service property.

RECOMMENDATION

The Commission:

Approves the preliminary site and building plans for the Intelligence Community Campus - Bethesda (South Campus), Centrum project.

Commends the applicant on the architectural concept it has developed for the ICC-B South Campus and **encourages** the applicant to integrate elements of this concept into the North Campus architecture, where possible, in order to establish a cohesive campus-wide aesthetic.

Commends the applicant for its use of environmental site design (ESD) strategies to manage stormwater runoff within the Centrum project's area of disturbance and **finds** that the project complies with the federal stormwater requirements of Section 438 of the Energy Independence and Security Act of 2007 and the state requirements contained in the *Maryland Stormwater Management Guidelines for State and Federal Projects*.

Requests the applicant to consider the following site and building plan modifications prior to submitting for final review:

- Reduce the height and mass of the Centrum penthouse enclosures, and setback penthouses from all exterior walls a distance greater than or equal to their height.
- Expand the area of the green roof and design the system to the greatest depth possible.
- Take into consideration the total estimated South Campus rooftop runoff volume and anticipated building greywater need when determining the final storage capacity of the cistern.
- Expand the capacity of the micro-bioretention areas by designing them to store the highest rainfall target technically feasible.
- Eliminate the Wellness Garden and utilize the area for additional impervious surface or ESD stormwater management, or at a minimum eliminate the proposed anti-climb fence and find a less intrusive way to secure this area.
- Utilize permeable pavements on all pedestrian paths, plazas, and courtyards where feasible.

Requests the applicant to provide the following information with its submission for final review:

- Responses to the Commission's suggested site and building plan modifications.
- Responses to any comments provided by the Montgomery County Planning Board and/or the Maryland-National Capital Park and Planning Commission staff.
- An updated stormwater management plan and narrative for the Centrum project, prepared in accordance with the Commission submission guidelines for final plan submissions and including final documentation of proposed ESD capacity / sizing and MDE and EISA compliance.
- A campus-wide stormwater management plan showing ESD opportunities and potential capacities on the North and South Campuses, potential outfall volumes and channel capacities, if available, and documentation, prepared in accordance with the EPA's guidance, addressing compliance with Section 438 of the Energy Independence and Security Act of 2007.

Notes that the applicant continues to work with interested and affected federal and state agencies, and interested community stakeholders, to address offsite stormwater runoff erosion and sedimentation damage caused during the previous occupancy of the site.

Notes that the applicant has recently completed a study to ascertain the impacts of offsite stormwater runoff erosion and sedimentation to adjacent National Park Service property pursuant to a Maryland Department of the Environment condition imposed upon the ICC-B North Campus final stormwater permit which requires the Defense Intelligence Agency, or its agent, to investigate, design, and construct repairs to downstream channels of the ICC-B.

Notes that progress is being made toward establishing a Memorandum of Understanding between the owner of the ICC-B site and the National Park Service for purposes of defining the working relationship between the two agencies for correcting downstream channel erosion and sedimentation to adjacent National Park Service property and **encourages** the applicant to finalize the Memorandum of Understanding prior to submitting the Centrum project for final review.

PROJECT REVIEW TIMELINE

Previous actions	**February 2012** – Approval of master plan for the Intelligence Community Campus-Bethesda as a guide for future reviews of individual site and building projects. (NCPC File No. MP7257). **July 2012** – Approval of preliminary and final site and building plans for ICC-B Phase 1 (North Campus). (NCPC File No. 7326). **October 2012** – Executive Director approval of final site development plans for ICC-B Phase 1 (North Campus).
Remaining actions (anticipated)	Final approval of site and building plans (July 2013)

Prepared by Shane Dettman
April 25, 2013

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Figures and Maps

I. PROJECT DESCRIPTION

Site

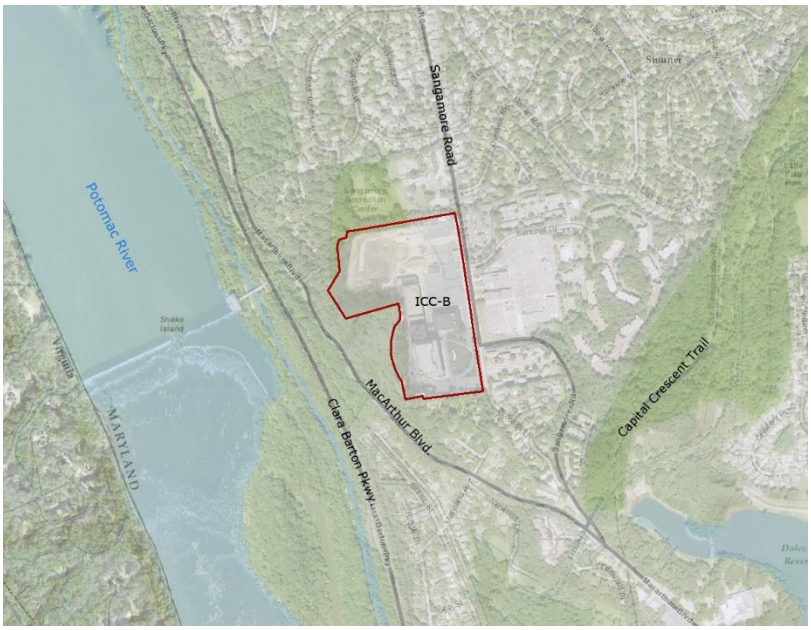

Figure 1: Topographic map showing location of ICC-B and vicinity.

The Intelligence Community Campus – Bethesda (ICC-B) is located at 4600 Sangamore Road, Bethesda, Maryland. The Campus encompasses approximately 30 acres and primarily consists of large office buildings and surface parking which results in approximately 20 acres of impervious surface, or 67% of the site area. (Figure 1) Primary buildings on the site include Erskine Hall, Roberdeau Hall, Maury Hall, and Abert Hall. (Figure 2) Among these buildings, Erskine Hall and Roberdeau Hall have been determined to have historic significance. A historic landscape also exists in the southeast portion of the site. The ICC-B's immediate surroundings include a private school and local park to the north that is accessed via a public trail that runs along the north boundary of the Campus, undeveloped land and residential uses to the south, and multi-family residential and a large retail development to the east across Sangamore Road. The entire western boundary of the ICC-B is steeply sloping, forested land that is owned by the United States Government, under the jurisdiction of the National Park Service (NPS). The NPS land extends nearly a quarter mile westward from the ICC-B to the Potomac River, approximately 150 vertical feet below the ICC-B, and includes sections of the Clara Barton Parkway, part of the George Washington Memorial Parkway (GWMP), the Chesapeake and Ohio Canal National Historic Park, and MacArthur Boulevard. A small residential neighborhood, accessed from MacArthur Boulevard via Wapakoneta Road, also exists to the northwest of the Campus. The areas beyond the ICC-B's immediate surroundings to the north, south, and east are primarily composed of moderate density, single-family detached neighborhoods. The Dalecarlia Reservoir, another federal facility, and the Capital Crescent Trail is located approximately one half mile southeast of the ICC-B.

Background

The ICC-B site has been a federal facility used for Department of Defense related purposes since 1945, when the site was originally deeded to the U.S. Government during World War II to serve as the headquarters of the Army Map Service. Over the course of its 70 year history, the size of the facility grew in land area to approximately 30 acres and in building area to approximately 715,000 square feet. Currently the site is largely unoccupied having been vacated by its previous tenant, the National Geospatial Agency (NGA), as a result of the 2005 Base Realignment and Closure which relocated NGA to Fort Belvoir.

Following the departure of NGA, the United States Army Corps of Engineers (USACE) and the Defense Intelligence Agency (DIA) began planning the redevelopment of the site for use by the United States Intelligence Community, a collection of 17 agencies and organizations that work to gather the intelligence necessary to conduct foreign relations and national security activities. A first step in USACE's process was developing an installation master plan for the ICC-B that is intended to guide the long-term redevelopment of the site. The master plan, approved by NCPC in February 2012, separates the redevelopment effort into two phases (North Campus and South Campus) and includes the creation of up to 850,000 square feet of secure office space, through renovation and new construction, consolidation of the existing surface parking into a new 1,800 space parking garage, and significant site improvements that will replace the impervious surface parking with landscape. Full build out of the master plan will accommodate a maximum personnel load of 3,000 employees, building staff, and visiting students.

Figure 2: Aerial photo showing ICC-B existing conditions and Centrum project area
North Campus parking garage under construction

At its July 2012 meeting, NCPC approved the preliminary and final site and building plans for the ICC-B North Campus. This phase of the ICC-B redevelopment, which encompasses approximately 12 acres, is currently under construction with completion expected by fall 2013. (Figure 2) The North Campus phase includes construction of the parking garage, a vehicle inspection station, a visitor control facility and small visitor parking lot, and various site and security improvements, and will reduce impervious surface on the North Campus from 8.2 acres to 4.3 acres (approximately 43%).

The redevelopment of the ICC-B South Campus will be carried out in multiple phases, with the current submission, the "Centrum" project, being the first phase. Construction of the Centrum is anticipated to begin early-Fall 2013 with completion in January 2015. The project is estimated to cost approximately $65 million and is fully funded.

Proposal

The United States Department of Defense, Army Corps of Engineers, on behalf of the Defense Intelligence Agency, has submitted preliminary site and building plans for the ICC-B (South Campus) Centrum project. The Centrum will provide campus-wide amenities, additional office space, and, most importantly, serve as the main circulation spine by tying together three existing buildings thereby creating one common, interconnected complex for use by the United States Intelligence Community.

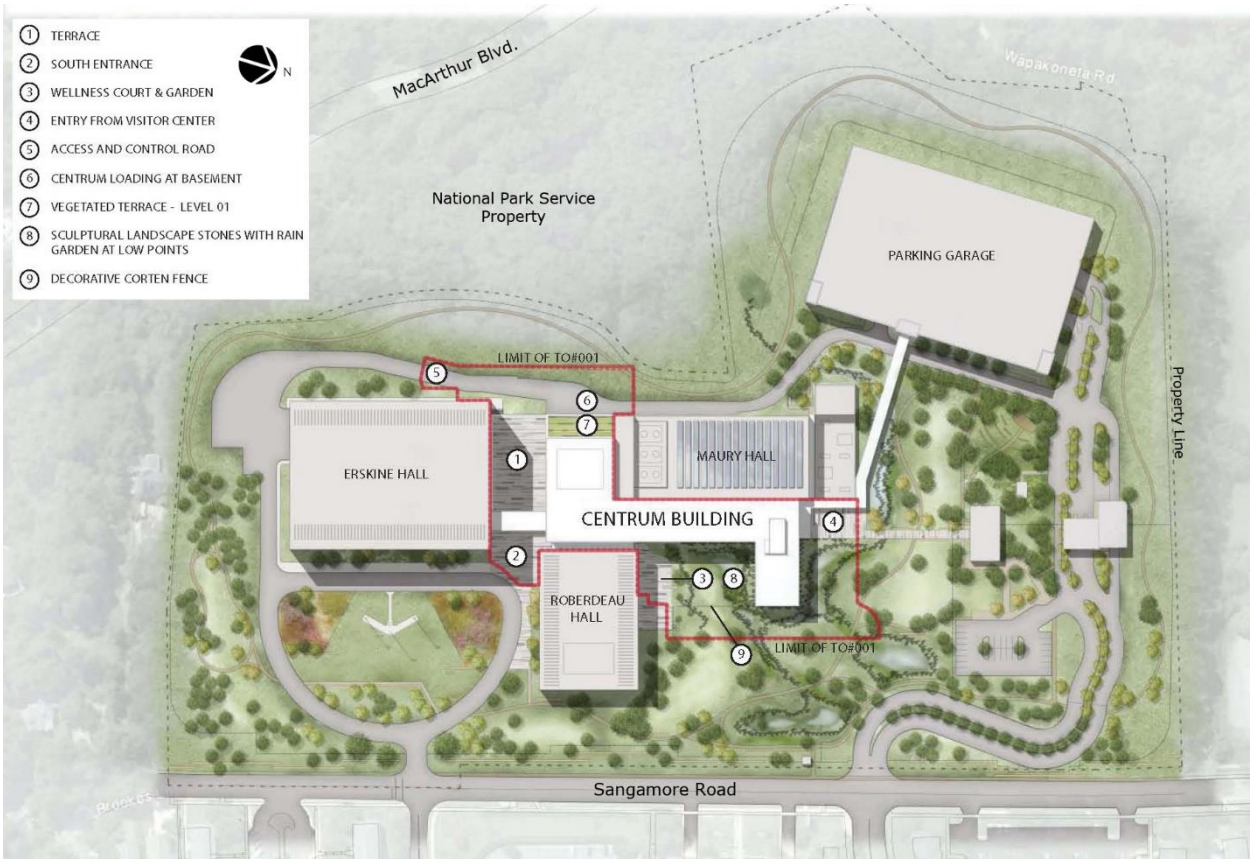

Figure 3: Site plan of proposed Centrum project showing project limits of disturbance

The proposed Centrum is oriented along a north-south axis with east-west wings at either end of the axis. The north wing extends eastward towards Sangamore Road; the south wing extend westward overlooking the Potomac River. (Figure 3) It is located primarily along what is now an internal campus roadway that runs between Roberdeau Hall, Maury Hall, and Abert Hall. The total area of disturbance for the project is approximately 130,000 square feet, 80% of which is impervious surface. In order to construct the Centrum, Abert Hall, a non-historic structure, will be demolished. As currently designed, the Centrum has a footprint of approximately 40,500 square feet and contains approximately 225,000 gross square feet on four, above-ground levels plus a full basement. An enclosed walkway will connect the Centrum to Erskine Hall on all levels. The height of the Centrum will rise 60 feet above grade to the parapet (312 feet above mean sea level (msl), and 72 feet to the top of the mechanical penthouse (324 feet above msl). The current Centrum design will reduce impervious surface by 12%, provide several campus amenities, and contain office space for approximately 356 employees.

The basement level will primarily contain building support space and a small amount of tenant space. This level will also contain a cistern that will capture stormwater runoff from the Centrum's roof for internal building system reuse. Though the final capacity of the cistern has not been determined, the applicant is currently assuming an estimated storage capacity of 20,000 gallons. Above the basement, a small mezzanine level will provide access to a loading area located at the rear (west) of the Centrum. Other than providing space for loading and unloading, the mezzanine provides minimal circulation space for purposes of connecting to the Centrum's vertical circulation (stairwell and elevator core). The main level will contain the primary building entry / security post located at the north end of the Centrum facing the Visitor Control Facility and employee parking garage. A north-south circulation corridor will lead from the building entrance to Erskine Hall with entrances to campus amenities and tenant space off the corridor. The majority of the main level will contain amenities including a 100-seat conference center and 500-seat auditorium that will be available to onsite staff and outside entities. (Figure 4) The conference center will be located in the Centrum's south wing with the conference center located off of the main corridor. This level will also contain a small amount of tenant space located in the Centrum's northern wing.

Figure 4: Main and third levels of proposed Centrum

The second level will consist primarily of secure tenant space located in the north and south wings. The east side of the second level circulation corridor will be open to the main floor below. The third and fourth levels of the proposed Centrum will provide secure tenant space and a cafeteria. The proposed 560 seat cafeteria will serve campus employees, student tenants, and users of the auditorium and conference rooms. (Figure 4) With its location in the south wing of the Centrum, cafeteria patrons will be afforded westerly views towards the mature parkland and the Potomac River, which can be enjoyed indoors or from the outdoor dining area. Finally, the roof level of the Centrum will contain three, 12-foot high mechanical penthouses. Based on the drawings submitted by the applicant, the penthouses will be setback from the exterior walls of the Centrum distances greater than or equal to the penthouse height with the exception of the area adjacent to Maury Hall.

Figure 5: Aerial perspective of Centrum (looking southwest from above Sangamore Road)

*** Renovation of Erskine and Roberdeau Halls and campus site improvements shown for context purposes and are not included in the current submission*

According to the applicant, it is envisioned that the exterior design of the Centrum will establish an overarching architectural baseline for the rest of the ICC-B South Campus redevelopment. (Figure 5) The Centrum's finish palette has been selected to mimic natural colors and materials, enhancing the connection of the building to the natural environment. Along the first two levels of the Centrum, where the intended building program does not permit full transparency, a combination of vision glass curtain wall and natural stone façade will be utilized to meet program needs and blend in with the surrounding landscape. (Figures 6 and 7) The stone façade will be composed of locally quarried charcoal grey slate panels measuring 8" x 30" and mounted horizontally to help anchor the Centrum to its site and contrast with the vertical orientation of the building's upper levels. On levels three and four, the building will be clad in a prefinished aluminum panel wall system. The aluminum panels will be finished in a variegated copper color range of three or four custom earth tones. The panels will be oriented in narrow, vertical proportions punctuated by patterned openings to maintain visual connections to the exterior and permit natural light to interior workspaces. Finally, at the Centrum's roof level, a high-reflective ballasted roof membrane will be used on almost the entire roof except for above the loading dock area which will utilize an inverted roof membrane assembly in order to accommodate a green roof system, approximately 3,650 square feet in size, as a way to reduce the amount of impervious surface on the site. The roof top mechanical enclosures will utilize a metal screen wall system that recalls the horizontal pattern and color of the building's natural stone base.

Figure 6: View of Centrum – North Wing
Looking southwest from Sangamore Road toward micro-bioretention areas

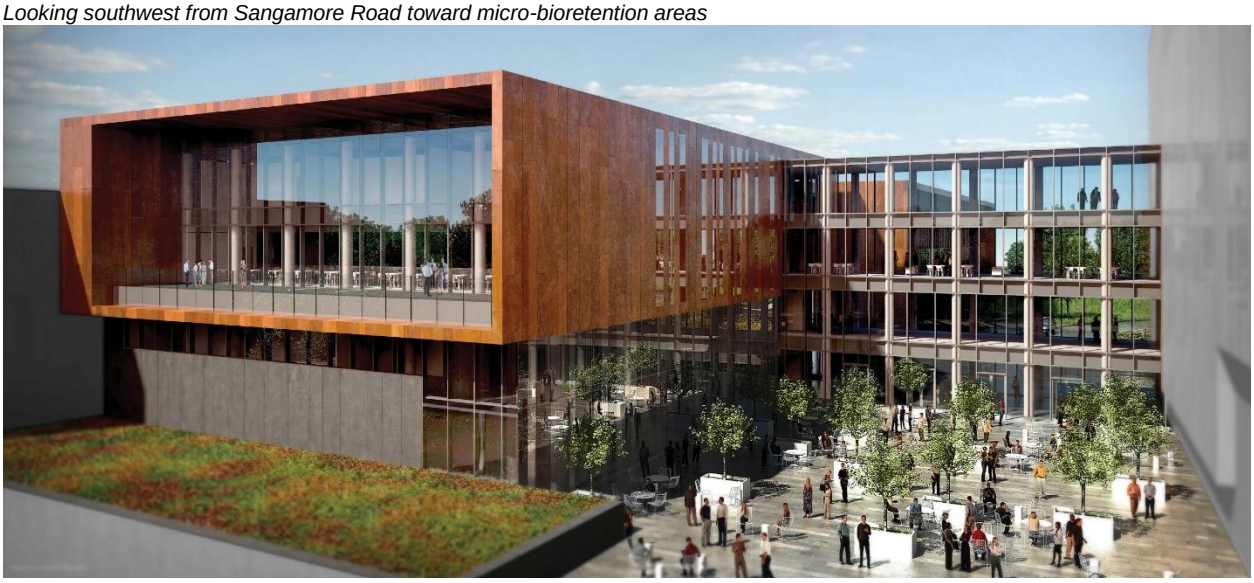

Figure 7: View of Centrum – South Wing (green roof, cafeteria, and Assembly Court)
Looking northeast toward Sangamore Road

Regarding site improvements, while the scope of the current submission is limited to the area of the Centrum project, the applicant has developed a campus-wide site design concept that is intended to guide site improvements throughout the redevelopment of the ICC-B, including those for the Centrum project. The landscape concept extends the characteristics of the park land, located to the west, through the site towards Sangamore Road, while maintaining integrity of the historic landscape east of Erskine Hall. The goal of the landscape concept is to establish the ICC-B complex within a park-like campus environment using native vegetation, local bedrock in terraces and low stone walls, and native hardwoods for site furnishings. A series of gentle topographic rises and depressions will accentuate the park-like environment in which campus buildings will sit. These depressions will provide a variety of spaces throughout the site that will allow for the collection, retention and infiltration of stormwater, while rises and slopes will provide views of native meadow and lawn. In all, these spaces will recall the drainage patterns of the site

that existed prior to the site's development and can be used for sustainable approaches to stormwater management.

As stated previously, the proposed Centrum site improvements are informed by the ICC-B landscape concept. Within the landscape of the Centrum project there will be four paved plazas, as follows: located at the main entrance on the north side of the Centrum (Entry Court), on the east side of the enclosed walkway to Erskine Hall (Ceremonial South Entrance), on the north side of Roberdeau Hall (Wellness Garden), in the courtyard created between the Centrum and Erskine Hall (Assembly Courtyard). (Figure 7) The plazas will be constructed of a stone that is similar to native stone outcroppings. The north Entry Court will serve as the main point of entry for visitors and employees (Figure 8), while the south entrance, adjacent to the historic formal landscape in front of Erskine Hall, will provide a ceremonial entry for visiting dignitaries and special events that are held in the Centrum or within the Assembly Courtyard (Figure 9). The Assembly Courtyard, which faces west towards the adjacent park land, will provide an outdoor space for employees to gather and a venue for events and graduations (Figure 10). Finally the Wellness Garden will be a space for personnel within the facility. The Wellness Garden will be secured with an anti-climb fence.

Figure 8: View of Entry Court

Figure 9: View of Ceremonial South Entrance

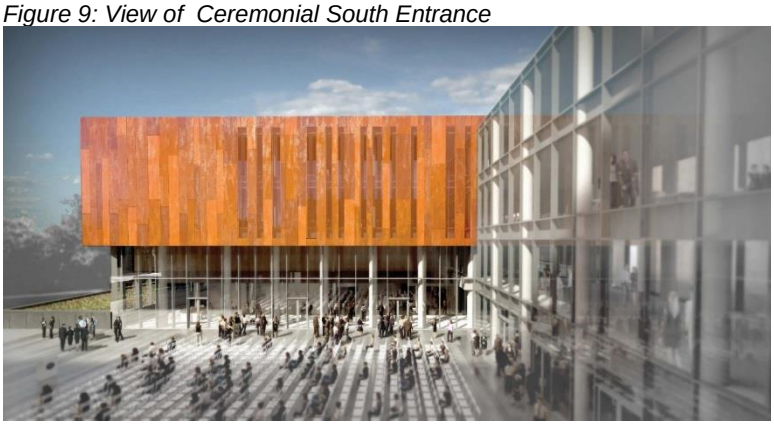

Figure 10: View of Assembly Court

Finally, sculptural landscape stones of the same type used on the plazas will be integrated into three micro-bioretention areas, or rain gardens, located on east and north sides of the Centrum. This sculptural element will be designed to convey stormwater runoff to low points within micro-bioretention areas that will also support a palette of native species and a variety of wildlife. The micro-bioretention ponds will serve as collection basins for runoff from the site and building roofs where water can percolate into the ground water. The total surface area of the three micro-bioretention ponds is approximately 48,000 square feet.

II. PROJECT ANALYSIS / CONFORMANCE

Executive Summary

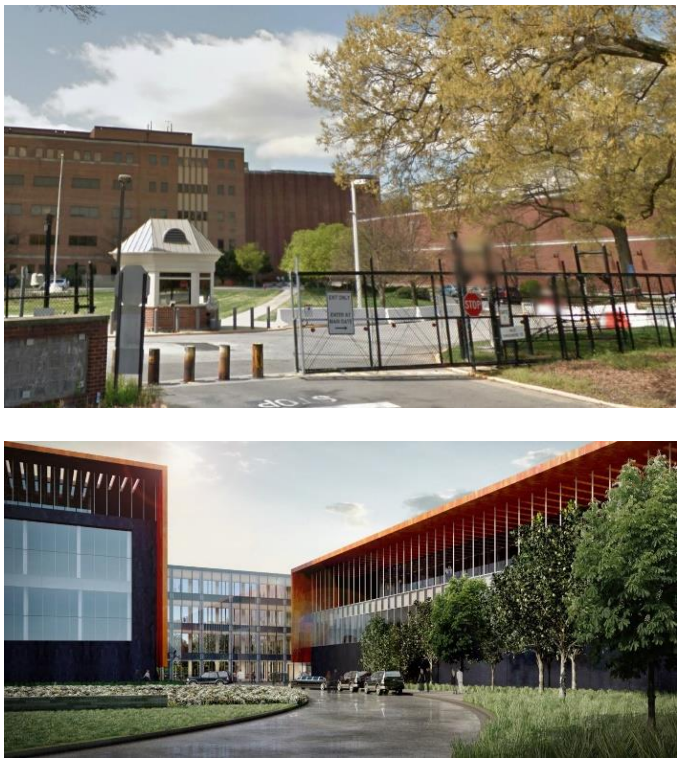

Figure 11: Existing and proposed view of ICC-B South Campus ceremonial entry

Staff recommends that the Commission approve the preliminary site and building plans for the Intelligence Community Campus – Bethesda (South Campus), Centrum project and commend the applicant on the architectural concept it has developed for the ICC-B South Campus, and for its use of environmental site design (ESD) strategies to manage stormwater runoff within the Centrum project's area of disturbance. The architectural concept will transform a collection of inefficient and outdated buildings with monolithic, program-driven designs that do not relate to the surrounding context, into a modern, interconnected complex that is more transparent and provides aesthetic interest while still satisfying secure mission requirements. (Figure 11) The Centrum project is the first step towards implementing this concept and as the primary circulation spine of the ICC-B building complex is critical to being able to carry out the rest of the South Campus redevelopment. Overall, the Centrum height, mass, and bulk are consistent with the existing ICC-B buildings and does not create any adverse effects on the surroundings, nor does the proposed palette of façade treatments. Staff notes that development of the South Campus concept occurred after development of the North Campus design, and therefore, while both modern have different design styles. Since an important objective of the ICC-B Master Plan is to develop an integrated campus environment, staff recommends that the Commission **encourage the applicant to integrate elements of the South Campus concept into the North Campus architecture where possible, in order to establish a cohesive campus-wide aesthetic**. Staff is also largely supportive of the proposed site improvements that are part of the Centrum project. The various plazas mark important entries into the complex and provide places for employees to socialize and events to be held.

With regard to stormwater management, the Centrum project has been designed in accordance with applicable federal and state requirements, and therefore, staff recommends that the Commission **find that the project complies with the federal stormwater requirements of Section 438 of the Energy Independence and Security Act of 2007 and the state requirements contained in the *Maryland Stormwater Management Guidelines for State and Federal Projects*.** As discussed in detail below, not only does the project comply with these requirements, it does so entirely through the use of Environmental Site Design strategies such as

micro-bioretention areas, a green roof, and a cistern used to capture and reuse runoff for internal building system needs.

Centrum Building

The overall height, mass, and bulk of the Centrum building is compatible with the South Campus buildings that will remain throughout the ICC-B redevelopment effort which include Erskine, Roberdeau, and Maury Halls. As currently designed, the height of Centrum measured from grade to the roof level will be 60 feet, and 72 feet to the top of the mechanical penthouse. (Figure 12) This is consistent with the height of Roberdeau Hall and below that of Erskine Hall. In terms of impacts to views, it is helpful to compare the Centrum to Erskine Hall, the tallest building on the site, in terms of elevation above mean sea level (msl). Following construction, the top of the Centrum penthouse will rest at 324 feet above msl. Meanwhile, the Erskine Hall penthouse has an elevation of 342 feet above msl, 20 feet higher than the Centrum. The end result as it pertains to visual impacts should be that views from the east along Sangamore Road, and from the north and south will not be adversely impacted since the height and massing of the Centrum are consistent with existing buildings. In addition, there will be several instances where views will be blocked by existing buildings or in some cases dominated by Erskine Hall. Views of the site from the west deserve special attention considering the sensitive nature of the Potomac River gorge, C&O Canal National Historic Park, and the Clara Barton Parkway. It is important that all efforts are made to avoid and/or minimize impacts to this scenic environment. When viewed from across the Potomac River at a point approximately 1.3 miles south near Chain Bridge, Erskine Hall is visible, and in particular the smoke stack and its mechanical penthouse. (Figure 13) Additional visual impacts from the Centrum are not expected since its overall height is lower than Erskine Hall and will largely be blocked by Erskine Hall from this vantage point. Visual impacts to the C&O Canal National Historic Park and the Clara Barton Parkway are also not expected due to the Centrum's distance from the west property line and the existence of Maury Hall, existing

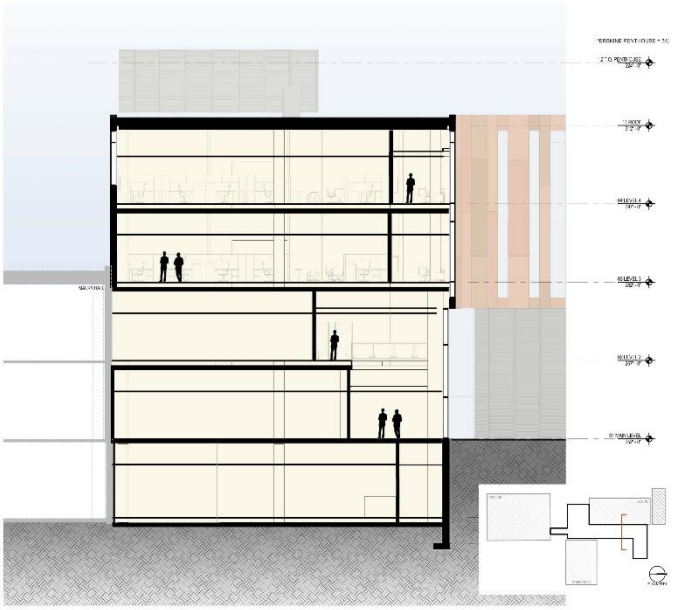

Figure 12: East-west cross-section of Centrum.

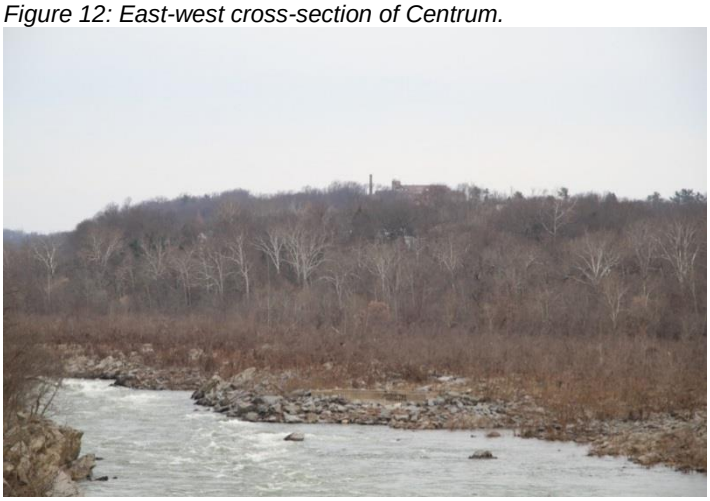

Figure 13: View of ICC-B from Chain Bridge.

tree canopy, and the difference in elevation. If there is any portion of the Centrum that may create a visual impact it would be the rooftop penthouses. As proposed, the penthouses have a height of 12 feet, which is lower than other penthouses that staff has seen in other building projects. For comparison purposes, staff consulted the Montgomery County Zoning Ordinance which does not appear to regulate the maximum height of mechanical penthouses. Though not applicable, staff notes that in the District of Columbia, an area where mechanical penthouse are closely regulated, the maximum permissible height is set at 18 feet 6 inches. While the height of the proposed penthouses is consistent, their lengths vary with the longest being approximately 90 feet. While staff recognizes that there are mechanical, structural, and functional requirements associated with the design and location of these building features, it also has seen instances where the visual presence of these features has been further minimized by breaking up penthouse enclosures and/or relocating equipment to an adjacent roof level. Therefore, while the proposal does not present any significant visual issues associated with the mechanical penthouses, staff recommends that the applicant **evaluate whether any reductions in the penthouse height and massing can be made, and to evaluate setting back the penthouses from all exterior walls a distance greater than or equal to their height** in order to further minimize any potential views of the penthouses from the west, and strengthen the architectural presence of the Centrum when viewed from the east. (Figure 14)

Staff commends the applicant for its use of a green roof over the loading dock, and a cistern to capture and reuse runoff from a portion of the Centrum's roof. Staff supports the use of ESD strategies to manage stormwater to the maximum extent feasible, and notes the added benefits that these strategies have beyond reducing runoff. For example, the benefits to a green roof system are well documented, and include:

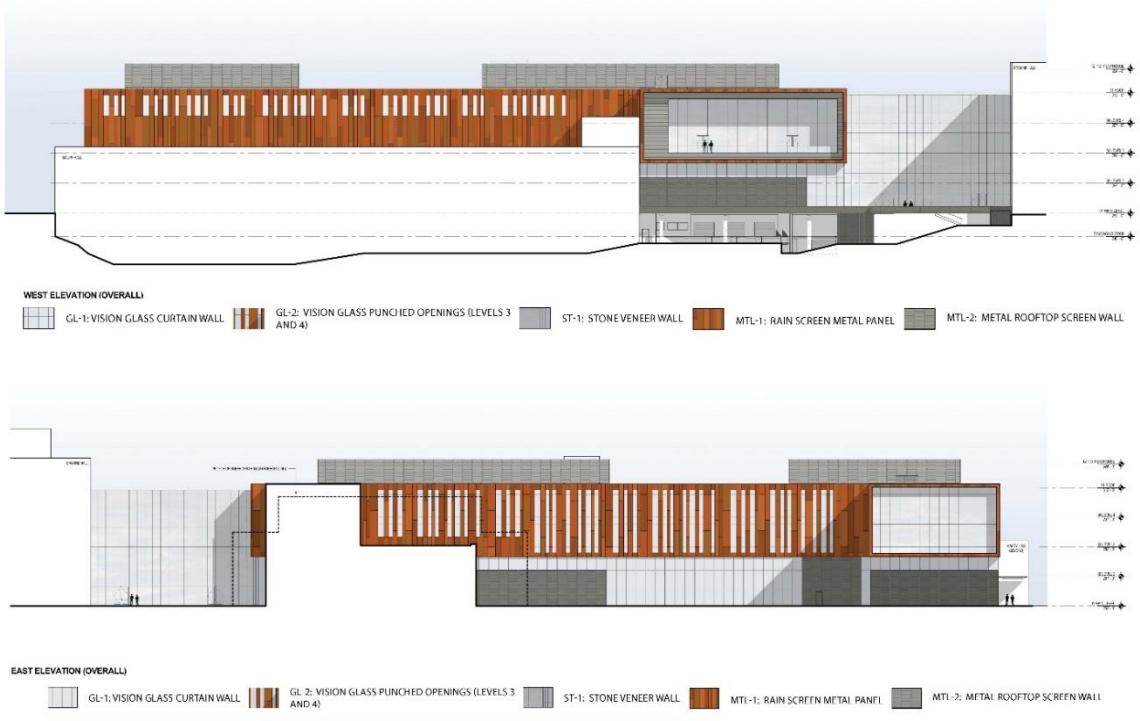

Figure 14: East and west elevations of the Centrum

- Mitigation of urban heat island effects
- Prolongation of roofing membranes and other building systems
- Improved air quality
- Reduced energy consumption
- Increased biodiversity

Figure 15: Location of proposed green roof.

Currently, the proposed green roof is only located over the loading dock, an area of approximately 3,600 square feet. (Figure 15) This is a relatively small portion of the total Centrum roof area which measures approximately 41,000 square feet. While a large percentage of the stormwater runoff from the Centrum roof will be directed to the cistern, with the rest directed to the micro-bioretention areas, the more extensive use of a green roof will provide greater benefits as listed above. In addition, the greater runoff retention provided by a green roof will decrease the amount of runoff eventually released into nearby stream channels and reduce the amount of water directed into the cistern and micro-bioretention areas, thereby freeing up capacity in both of these facilities to accept stormwater from other sources. Considering the potential direct and indirect benefits provided by a larger green roof system, staff is recommending that the applicant **consider expanding the area of the proposed green roof and to design the system to the greatest depth possible.**

Finally, staff recommends that the applicant **take into consideration the total estimated South Campus rooftop runoff volume and anticipated building greywater reuse need when determining the final storage capacity of the cistern.** Understanding that the scope of the current submission only involves the Centrum, and that there may be programmatic, structural, and/or fiscal constraints to being able to incorporate a larger cistern than what is currently proposed, in staff's judgment the most prudent time to conduct at least a rough order of magnitude analysis of the expected South Campus rooftop runoff volume and overall demand for internal greywater reuse is at this early stage in the design development for the Centrum and the rest of the South Campus. As envisioned, the Centrum will not only be the central circulation spine for the South Campus, it will also contain centralized building systems that will serve the entire interconnected campus complex. Therefore, any intention or potential to fulfill at least a portion of the greywater demand for the larger complex using the proposed cistern should be considered early in the design process. In addition, as this is the only new construction project included in the South Campus redevelopment, the Centrum presents some sustainable development opportunities that do not exist throughout the rest of the campus due to known constraints on the North Campus, as presented by the applicant during the Commission's review of that project, and structural limitations of the existing buildings on the South Campus as described in Sections 3.5 and 5.2 of the ICC-B Master Plan.

Site Improvements

Figure 16: Example of a micro-bioretention area.

*** For information purposes only, image is not of the ICC-B.*

Despite the majority of the project area being taken up by the Centrum's footprint, the applicant has taken steps to maximize the functional, programmatic, and aesthetic value of what site improvements are being proposed. The two entry plazas, the Main Entry Court and the Ceremonial South Entrance, are appropriately located and both provide dignified entry points into the South Campus complex. The Main Entry Court will serve as the primary entrance for employees who park in the garage and visitors that are screened through the Visitor Control Center. The Ceremonial South Entrance will be used during events and to receive important guests and high-ranking officials. Given its intended use, its location adjacent to the historic landscape in front of Erskine Hall and proximity to the Assembly Courtyard is fitting. The applicant is also doing a commendable job of combining landscape form and function by providing micro-bioretention areas that will collect and treat stormwater runoff from the Centrum while at the same time provide aesthetic value and support indigenous vegetation and a variety of wildlife. (Figure 16) The aesthetic value of the micro-bioretention areas will be increased through the use of sculptural flagging of the same native stone used on the plaza areas which will be designed to convey runoff to low points of the bio-retention areas.

The Wellness Garden, while a good idea in concept may not result in the type of amenity as envisioned given its location on the north side of Roberdeau Hall and adjacent to the proposed micro-bioretention ponds. Rather than designating a defined space as a Wellness Garden. This approach would provide more opportunities to further integrate the interconnected building space with the surrounding landscape by providing employees a collection of interconnected outdoor spaces in which they could either conduct business, as appropriate, or just sit and enjoy. In addition, this approach allows use of the area currently proposed for the Wellness Garden for additional stormwater management. Nonetheless, if the Wellness Garden is considered to be a programmatic absolute, then in staff's judgment there are less intrusive ways to securing this area than utilizing an anti-climb fence. The use of a fence in this location seems unnecessary considering that the campus will have a fully secured perimeter. Therefore, staff recommends that the applicant **consider eliminating the Wellness Garden and utilize the area for additional impervious surface or ESD stormwater management, or at a minimum eliminate the proposed anti-climb fence and find a less intrusive way to secure this area.** As a final note on the proposed Centrum site plan, staff is recommending that the applicant **consider using permeable pavements on all pedestrian paths, plazas, and courtyards where feasible.**

Storm Water Management

State of Maryland Regulations

Staff finds that the preliminary plans and supporting information for the Centrum project exceed applicable state stormwater management regulations. The state regulations that

apply to this project are found in the "Maryland Stormwater Management Guidelines for State and Federal Projects," which supplement the 2000 Maryland Stormwater Design Manual and all subsequent revisions, and provide the minimum stormwater management requirements for plans submitted by state and federal agencies to the Maryland Department of the Environment (MDE). These guidelines exist to "protect, maintain and enhance the public health, safety, and general welfare by establishing minimum requirements and procedures to reduce the adverse impacts associated with increased stormwater runoff," and require management of stormwater through environmental site design (ESD) to the maximum extent practicable (MEP). The guidelines define maximum extent practicable as "designing stormwater management systems so that all reasonable opportunities for using ESD planning techniques and treatment practices are exhausted and only where absolutely necessary, a structural best management practice (BMP) is implemented."

Pursuant to the state regulations, since the percentage of impervious surface within the Centrum's limits of disturbance (LOD) is greater than 40 percent, the applicant is required to meet the stormwater management standard established for *redevelopment* projects. For redevelopment projects, the stated goal of the regulations is to gain water quality treatment on existing developed lands while supporting initiatives to improve urban areas. In order to meet this goal, the regulations require that stormwater management be addressed according to the following criteria:

- Reduce existing impervious area within the LOD by at least 50%; or
- Implement ESD practices to the MEP to provide water quality treatment for at least 50% of existing impervious area within the LOD; or
- Use a combination of impervious area reduction and ESD implementation for at least 50% of existing impervious areas.

According to information provided by the applicant, the Centrum project will reduce the amount of impervious surface within the LOD by approximately 14,430 square feet (SF), or 12 percent. As this does not meet the 50% reduction threshold, the applicant is required, to the MEP, to design a stormwater management plan that utilizes ESD capable of managing the runoff volume (ESDv) for at least 50% of the existing impervious area in the LOD using a target rainfall of one inch. According to the applicant's Stormwater Management Concept Report, which was submitted to, and accepted by, MDE, the Centrum LOD measures 128,452 SF, of which 103,475 is impervious surface. Therefore, using half of the existing impervious surface (51,738 SF), a rainfall target of one inch, and a constant runoff coefficient, the required ESDv for the Centrum project equates to 2,948 cubic feet (cf). As described below, the applicant's current proposal exceeds the required ESDv.

In order to meet the required ESDv the applicant is utilizing a green roof and three micro-bioretention areas. The green roof, located on the west side of the Centrum project over the loading dock, has a proposed surface area of approximately 3,650 SF. Although the final thickness of the green roof system has not been determined, a six-inch green roof with an ESD volume of 347 cf was utilized in the applicant's concept submission to MDE. The final green roof thickness will be determined as part of the final design process.

The second ESD strategy being employed by the applicant is the use of three micro-bioretention facilities. As noted above, three of these facilities will be located along the eastern side of the Centrum in an area that is currently surface parking. According to the applicant's most recent calculations, the three facilities have been sized to provide a combined minimum ESD volume of

4,146 cf. As shown in Table 1, the preliminary project design exceeds the total ESDv required by MDE by 1,545 cf. It is important to note that while the MDE regulations allow for the capture, treatment, and release of stormwater runoff, effectively known as detention, the ESDv being provided by the green roof and micro-bioretention areas is being retained onsite. Both of the proposed ESD strategies will be designed to capture the required ESDv and allow it to infiltrate or evaporate while an under drain network will provide dewatering and conveyance of large storm flows partially to an internal greywater system that will use the additional runoff in the Centrum's mechanical functions. Staff also notes that for purposes of MDE compliance, the additional 2,674 cf of ESDv provided by the proposed cistern is not necessary to meet MDE requirements.

ESD Strategy	Dimensions*	Area Treated (SF)*	ESDv Provided (cf)*
Green Roof	36.5' x 100'	3,650	347
Micro-bioretention 1	40' x 80'	20,830	1,581
Micro-bioretention 2	40' x 85'	21,665	1,885
Micro-bioretention 3	25' x 50'	7,945	680
Total		**54,090**	**4,493**
****Cistern**	--	--	2,674
		ESDv Required	**2,948**
		ESDv Provided	**4,493**
		ESDv Provided w/ cistern	**7,167**

Table 1: Summary of Centrum project ESD stormwater storage capacity
** Numbers subject to change as project design is further developed*
*** Cistern not required to achieve required MDE ESD treatment volume*

Federal Regulations

Staff finds that the preliminary plans and supporting information submitted for the Centrum project slightly exceed applicable federal stormwater regulations. The federal stormwater regulation that applies to the project is found in Section 438 of the Energy Independence and Security Act of 2007 (EISA) which requires "the sponsor of any development or redevelopment project involving a federal facility with a footprint that exceeds 5,000 square feet to use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow." In 2009, Executive Order 13514 was issued by President Barack Obama which included a requirement for the Environmental Protection Agency (EPA), in coordination with other Federal agencies, to issue guidance on the implementation of EISA. The EPA's guidance, entitled "Technical Guidance for Implementing the Stormwater Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act" was issued in December 2009.

The EPA guidance, provides a performance-based approach to stormwater management in lieu of a prescriptive requirement in order to provide site designers maximum flexibility in selecting control practices appropriate for a given site. The guidance provides two options for complying with EISA. The first option, requires project sponsors to design, construct, and maintain stormwater management practices that manage rainfall onsite, and prevent the off-site discharge of the volume of rainfall runoff attributable to the 95th percentile rainfall event to the maximum

extent technically feasible (METF). The second option allows sponsors to "design, construct, and maintain stormwater management practices that preserve the pre-development runoff conditions following construction."

For the Centrum project, the applicant is utilizing the first option and therefore is designing a stormwater management system that will be capable of retaining the volume of runoff from the 95th percentile rainfall event, which according to the guidance is equivalent to 1.7 inches. In order to calculate the target storage volume, the applicant is using the TR-55 method for calculating runoff. This method, which was developed by the National Resource Conservation Service, is acknowledged by the EPA guidance as an acceptable method for estimating runoff and placing onsite control measures to capture the 95th percentile rainfall event. Application of the TR-55 method to the Centrum project results in an EISA required storage volume of 7,041 cf. As currently designed, the three ESD strategies being employed for the Centrum project will be capable of retaining slightly more than the EISA required storage volume. As shown in Table 1, the combined storage volume of the proposed micro-bioretention areas, green roof, and cistern equals 7,167 cf. In addition, on April 22, 2013, NCPC staff met with an EPA representative that was involved in the development of the EISA guidance. After discussing the project and reviewing the preliminary project plans and supporting information, the representative indicated that the applicant's approach to complying with EISA Section 438 is in line with the procedures described in the guidance.

Other ICC-B Stormwater Related Issues

Campus-wide Stormwater Management Plan

As recommended by staff, the applicant is in the process of preparing a campus-wide stormwater management plan that will include a holistic look at possible ESD opportunities on both the North and South Campuses. One purpose of the plan is to provide an estimate regarding what will be necessary to achieve compliance with applicable state and federal stormwater regulations. The plan will identify opportunities, and locations where appropriate, for impervious surface reduction, infiltration, and capture and reuse of stormwater both in the landscape and within building systems, and will be used to guide the design of more detailed stormwater management plans for individual projects. The campus-wide plan will contain rough order of magnitude calculations on required storage / treatment volume under EISA and MDE regulations. These calculations will be a valuable benchmark when reviewing the build out of the South Campus and overall ICC-B site improvements. Staff is informed by the applicant that the campus-wide management plan is close to completion, therefore staff recommends that the Commission request the applicant to **provide with its final submission of the Centrum project a campus-wide stormwater management plan showing ESD opportunities and potential capacities on the North and South Campuses, potential outfall volumes and channel capacities, if available, and documentation, prepared in accordance with the EPA's guidance, addressing compliance with Section 438 of the Energy Independence and Security Act of 2007.**

Analysis of Pre-existing Off-site Erosion and Sedimentation on NPS Property

On September 4, 2012, the applicant was informed by the Maryland Department of the Environment that final approval of its North Campus stormwater management plan will include a condition that would require the Defense Intelligence Agency (DIA), or its agent, to address the

significant erosion and stability problems for which the campus is at least partially responsible. The condition, which was included in MDE's final approval dated January 14, 2013, reads as follows:

> *"This approval is contingent upon DIA, or its agent, investigating, designing and constructing repairs to stabilize the downstream channel(s). The repairs should, at a minimum, be commensurate with the level of responsibility of the campus' contribution to the channel's issues."*

As a first step toward fulfilling the MDE condition, the applicant commissioned a study to investigate the potential downstream drainage channel impacts resulting from development of the ICC-B site over time. The study was completed in early-April 2013 with input provided by MDE, National Park Service, the National Geospatial Agency (NGA), as former operator of the site, and the Department of the Army. The applicant also afforded members of the community that are particularly interested ICC-B stormwater issues an opportunity to review the scope of work for the study and comment on the final report. The applicant delivered the final report to MDE on April 11, 2013 and is now awaiting comments.

NPS and DIA Memorandum of Understanding

Consistent with the Defense Intelligence Agency's (DIA) commitments to the community made on January 30, 2012, DIA and the U.S. Army Corps of Engineers have been cooperating with NPS to support the correction of off-site historical erosion. DIA has also had discussions with the Department of the Army and NGA regarding the obligation of funds to construct the necessary corrections. As requested by Commissioner Peter May, representing the United States Department of the Interior, at NCPC's March 7, 2013 information presentation on the Centrum project, the applicant has made considerable progress toward establishing a Memorandum of Understanding (MOU) between the Intelligence Community and the National Park Service for purposes of defining the working relationship between the two agencies for correcting downstream channel erosion and sedimentation to adjacent National Park Service property. A draft MOU has been prepared and was submitted to NPS on April 9, 2013. NPS is currently in the process of reviewing the MOU, and upon completion will be meeting with DIA and USACE to discuss modifications to the agreement. Staff notes that the applicant has also made the draft MOU available to the community for review during one of its regularly scheduled stormwater document review sessions.

On April 12, 2013, NCPC staff consulted with the NPS representative overseeing the ICC-B redevelopment to discuss the status of the MOU and current position on the process thus far. The NPS representative informed staff that the agencies are working closely to get the MOU in place so that the process to develop and analyze remediation alternatives can begin, that NPS will manage. The representative indicated that at this point NPS is content with where the MOU process is and with how the two agencies are working together.

Comprehensive Plan for the National Capital

Staff has determined the project to be not inconsistent with the polices of the Federal Elements of the Comprehensive Plan for the National Capital, and specifically those policies contained in the Federal Workplace and the Federal Environment Elements. With regard to the location of

federal workplaces, the Comprehensive Plan encourages federal agencies to reuse existing buildings or sites before purchasing or leasing additional land or building space in part to minimize the development of open space. It also supports modernization, repair, and rehabilitation of existing facilities over developing new facilities. The Centrum project is the first phase of the ICC-B South Campus redevelopment effort which, together with the active North Campus redevelopment effort, will transform an inefficient and outdated federal facility into a sustainable, state-of-the-art, interconnected workplace that fosters a secure and collaborative environment in which the U.S. Intelligence Community can carry out its important mission. The modernized campus will also provide a primary facility that will establish an architectural identity for the Intelligence Community, starting with the Centrum project, which can create a sense of pride, purpose, and dedication in employees. (Figure 17) Finally, the Federal Workplace Element encourages federal agencies to consult with local agencies to ensure that federal workplaces enhance the design qualities and vitality of their communities and are compatible with the character of the surrounding properties, where feasible. Staff notes that the applicant has met with the Maryland-National Capital Planning Commission (M-NCPPC) staff to discuss the project and to schedule a formal presentation to the Montgomery County Planning Board. This is consistent with the notation made in the Commission's final action on the ICC-B Master Plan in which it acknowledged the applicant's commitment to submit plans for each ICC-B phase to M-NCPPC for review of building massing, articulation, and materials, landscape design, and screening. It is anticipated that the meeting with the Montgomery County Planning Boards will take place prior to NCPC's final review of the Centrum project. Therefore, staff is recommending that the Commission **request the applicant to submit responses to any comments made by the Montgomery County Planning Board and/or the Maryland-National Capital Park and Planning Commission staff prior to submitting the Centrum project for final review**.

Figure 17: Location of proposed green roof.

The Federal Environment Element contains the Commission's planning policies related to the maintenance, protection, and enhancement of the National Capital Region's environment. The element provides an overall framework from which NCPC evaluates the environmental implications of federal projects. The element contains specific policy areas that address air quality, water quality and supply, land resources, and human activities. The policy area that is most germane to the proposed Centrum project is the one dealing with water quality considering the significant amount of impervious surface that currently exists on the ICC-B. The extensive surface parking, roadways, and building area on the ICC-B has resulted in substantial increases in stormwater runoff volume and flow rate that has caused considerable stream channel erosion on adjacent National Park Service (NPS) property and sedimentation in the C&O Canal National Historic Park. However, over time this condition can be significantly improved through the redevelopment of the ICC-B in accordance with the Commission approved master plan, and the applicant's continued efforts to work with affected federal and state agencies, and interested

members of the community, to fulfill its commitments to the larger community and correct the damage to NPS property.

The preliminary plans for the Centrum project adhere to several of the water quality policies contained in the Federal Environment Element through the employment of several sustainable stormwater management strategies. The Comprehensive Plan encourages the use of innovative and environmentally friendly best management practices (BMPs) in site and building design and construction to reduce stormwater runoff and erosion, avoid impacts to surface waters and off-site water quality, and facilitate the natural recharge of groundwater; and to implement these BMPs in accordance with applicable federal, state, and/or local requirements.

As discussed above, the current proposal utilizes three micro-bioretention areas, a green roof, and a cistern to treat stormwater runoff within the Centrum project's area of disturbance. Based on the information contained in the applicant's preliminary submission materials, these ESD best management practices have been designed in accordance with state and federal stormwater requirements. In addition to the benefits of these BMPs on stormwater runoff, erosion, and water quality, they will also have the added benefit of reducing ICC-B generated wastewater through the reuse of rainwater captured in the cistern for landscape irrigation and/or to fulfill certain internal building system needs. Finally, the project will result in an approximate 12% reduction in impervious surface through the replacement of a portion of the surface parking located within the Centrum area of disturbance to vegetated micro-bioretention areas and the use of a small green roof. As supported by the Comprehensive Plan, these areas will utilize native trees and vegetation which, in addition to fulfilling a stormwater management function, will also help moderate urban heat island effects and provide habitat for wildlife.

Federal Capital Improvements Program

The Centrum project is not included in the Federal Capital Improvement Program (FCIP).

Relevant Federal Facility Master Plan

The project is consistent with the NCPC approved Intelligence Community Campus – Bethesda Master Plan (April 2012). According to the Master Plan, a focus of the ICC-B redevelopment is to redefine the existing facility to serve the operational and secure space needs of the National Intelligence Community in the National Capital Region in a manner that is context sensitive and environmentally friendly, and includes planning objectives that address improving campus connectivity and incorporating sustainable site and building design. The Master Plan presents the Centrum project as a key component to overcoming space utilization and circulation shortcomings

Figure 18: Comparison of ICC-B Master Plan (left) and South Campus concept (right)

of the existing buildings by envisioning an infill building that would tie together Erskine, Roberdeau, and Maury Halls into one interconnected structure. The Plan even envisions the architectural design of the Centrum as having a high-tech aesthetic appearance that uses a metal panel and glass curtain wall system. (Figure 18)

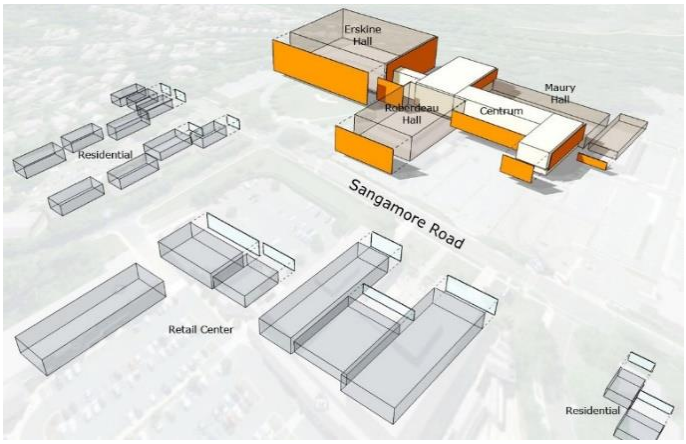

Figure 19: Massing diagram of relation between South Campus and existing development.

Programmatically, the proposed Centrum is consistent with what is contemplated in the ICC-B Master Plan, the current proposal maintains the same points of employee and visitor arrival as well as amenities such as the auditorium, amenity spaces, cafeteria, and building support spaces. The overall height, mass, bulk, organization, orientation, and exterior materials of the current proposal are also consistent with what is contemplated in the ICC-B Master Plan, although further refined. As currently designed, the Centrum will appear less massive, and therefore less visually intrusive on the site and neighborhood, compared to what is presented in the Master Plan. Rather than designing the Centrum to create the sense of one building mass, the current proposal maintains the massing of the existing buildings, responds to the development pattern across Sangamore Road, and allows the Centrum to have its own identity. (Figure 19)

National Environmental Policy Act (NEPA)

The Centrum project was included in an Environmental Assessment (EA) prepared by the applicant during the development of the ICC-B Master Plan. The EA was prepared in accordance with NEPA and regulations promulgated by the White House Council on Environmental Quality, the Department of Defense, and the Department of the Army. Overall, the EA identify several short-term, minor, adverse environmental impacts primarily associated with construction related activity. The EA identified potential for long-term, minor, adverse impacts to air quality, cultural resources, and soils resulting from the redevelopment of the Campus. In addition, several long-term, beneficial impacts we identified such as to surface waters, drainage, stormwater management, vegetation, wildlife, and traffic. The EA analysis did not identify any potential for significant direct, indirect, or cumulative environmental impacts, and therefore, the applicant completed the NEPA process with the issuance of a Finding of No Significant Impact (FONSI) on September 8, 2011.

Pursuant to the National Capital Planning Act, NCPC's review authority over federal projects outside the District of Columbia is advisory, and therefore, in carrying out its review of the Centrum project NCPC does not have an independent NEPA obligation.

National Historic Preservation Act (NHPA)

The applicant's NHPA Section 106 obligation for the Centrum project is considered fulfilled pursuant to the Memorandum of Agreement established on October 14, 2011 between the Maryland Historic Trust and the Defense Intelligence Agency for the implementation of the ICC-

B Master Plan. During the Section 106 consultation process for the ICC-B Master Plan, it was determined that implementation of the Master Plan would have adverse effects on Erskine Hall, which is eligible for listing in the National Register of Historic Places. The stipulations of MOA require the applicant to retain Erskine, Maury, and Roberdeau Halls (excluding the brick facades) In addition, the applicant is required to maintain the setting of the Flagpole and Globe Memorial located to the east of Erskine Hall. The Centrum project will not impact the applicant's ability to adhere to these stipulations.

Pursuant to the National Capital Planning Act, NCPC's review authority over federal projects outside the District of Columbia is advisory, and therefore, in carrying out its review of the Centrum project NCPC does not have an independent obligation to satisfy the requirements of Section 106 of the NHPA.

III. CONSULTATION

Coordination with Federal, State, and Local Agencies

The applicant has coordinated the Centrum project with all applicable federal, state, and local agencies either as required or as a continuation of its commitments made during the development of the ICC-B Master Plan.

National Park Service

The applicant has met with NPS several times to discuss efforts to study and correct pre-existing erosion and sedimentation damage to the adjacent NPS parkland (Table 2). According to the applicant, six meetings have taken place since January 2013 to go over aspects and receive comments on the "ICC-B Redevelopment Outfall Channel Study," and to discuss the Memorandum of Understanding (MOU) that is being developed between the Defense Intelligence Agency and the National Park Service that will guide the process for correcting the downstream stormwater runoff damage to NPS property. On April 12, 2013, staff consulted with the primary NPS point of contact for the ICC-B project who expressed satisfaction at this point in time for where the MOU negotiations stand. The NPS representative indicated that thus far efforts are moving in a positive direction and that NPS is currently preparing comments on a draft MOU delivered by the applicant on April 9, 2013.

Meeting Date	Meeting Focus
January 29, 2013	· MDE Phase 2 drawings and report
February 12, 2013	· Channel study statement of work
February 22, 2013	· Channel study preliminary results
March 21, 2013	· Channel study draft report
April 9, 2013	· Draft MOU
April 15, 2013	· Channel study final report

Table 2: Summary of meetings with the National Park Service (as of April 22, 2013)

Maryland Department of the Environment

As required by the Code of Maryland Regulations and the *Maryland Stormwater Management Regulations for State and Federal Projects,* on January 29, 2013, the applicant submitted a

stormwater management concept report for the Centrum project to the Maryland Department of the Environment. By memorandum dated February 4, 2013, MDE deemed the concept acceptable and provided several questions / comments which the applicant is in the process of addressing. In addition, on March 26, 2013 the applicant submitted its first sediment and erosion control permit application which MDE provided comments on April 5, 2013. According to the Maryland Stormwater Management Regulations, the permit process consists of three stages: concept plan, site development plan, and final stormwater management plan.

Maryland National Capital Park and Planning Commission

On April 29, 2013, the applicant met with staff from the Maryland National Capital Park and Planning Commission (M-NCPPC) to discuss the Centrum project design and any other related issues. The focus of the meeting was to review the building and landscape designs for compatibility with the surrounding community in the areas of building massing, articulation, and materials, landscape design, and screening. In addition to staff level consultation, the applicant and M-NCPPC staff are currently working out the details of scheduling a formal presentation to the Maryland Department of Planning. As noted above, it is anticipated that the meeting with the Montgomery County Planning Board will take place prior to NCPC's final review of the Centrum.

Washington Suburban Sanitary Commission

The applicant has also met with the Washington Suburban Sanitary Commission (WSSC) to discuss the Centrum project. According to the applicant, after discussions with the WSSC Development Services group, it was determined that because the reconfiguration of the on-site water and sanitary sewer system does not require connection to or modification of existing connections to the WSSC services located under Sangamore Road, WSSC review and approval is not required. This exception from review and approval is in accordance with the 2011 WSSC Plumbing Code.

Coordination with Local Community

Since NCPC's approval of the ICC-B Master Plan, the applicant has done a commendable job in maintaining its outreach and coordination efforts with the local community and making arrangements to provide access to information that is not able to be publicly distributed. In addition to its ongoing participation in a community led Joint Traffic Committee, which has met four times since September 2012, the applicant has held several public meetings to discuss the ongoing North Campus construction and planning activities associated with the South Campus, including the Centrum Project. In addition, the applicant has also hosted four "community leaders" meetings, attended by representatives of several local condo, neighborhood and civic associations. These meetings tend to be more detailed and focused on discussing and resolving more specific planning issues such as tree removal, stormwater management, and correction of pre-existing off-site erosion and sedimentation damage on adjacent National Park Service property. In addition, the applicant provides regularly scheduled opportunities for community members that are particularly interested in ICC-B stormwater issues to review stormwater management plans, compliance documents, and other related studies or correspondence. Finally, the applicant also informs the community of significant construction activities on a regular basis through a USACE email letter and updates to the USACE Baltimore District website. A summary of community meetings and key discussion topics is included in Table 3.

Meeting	Number of Meetings	Most Recent	Key Topics
General Community	5	February 7, 2013	· South Campus concept · Centrum project
Community Leaders	4	April 18, 2013	· Centrum project design · Offsite erosion correction · NCPC submission
Stormwater Document Review	10	April 19, 2013	· Offsite erosion correction · Outfall study
Traffic Committee	4	January 28, 2013	· Construction activity

Table 3: Summary of community coordination meetings (as of April 22, 2013)

Commission Action

May 2, 2013

PROJECT
Intelligence Community Campus – Bethesda
(South Campus), Centrum
Intelligence Community Campus – Bethesda (MP7257)
4600 Sangamore Road
Bethesda, MD

SUBMITTED BY
United States Department of Defense, Army Corps of Engineers on behalf of the Defense Intelligence Agency

NCPC FILE NUMBER
7326

NCPC MAP FILE NUMBER
3101.10(38.00)4372

APPLICANT'S REQUEST
Preliminary approval of site and building plans

ACTION TAKEN
Approve with comments

REVIEW AUTHORITY
--Federal Project in the Environs
Per 40 U.S.C. § 8722(b)(1)

The Commission:

Approves the preliminary site and building plans for the Intelligence Community Campus - Bethesda (South Campus), Centrum project.

Commends the applicant on the architectural concept it has developed for the ICC-B South Campus and **encourages** the applicant to integrate elements of this concept into the North Campus architecture, where possible, in order to establish a cohesive campus-wide aesthetic.

Commends the applicant for its use of environmental site design (ESD) strategies to manage stormwater runoff within the Centrum project's area of disturbance and **finds** that the project complies with the federal stormwater requirements of Section 438 of the Energy Independence and Security Act of 2007 and the state requirements contained in the *Maryland Stormwater Management Guidelines for State and Federal Projects*.

Requests the applicant to consider the following site and building plan modifications prior to submitting for final review:

- Reduce the height and mass of the Centrum penthouse enclosures, and setback penthouses from all exterior walls a distance greater than or equal to their height.
- Expand the area of the green roof and design the system to the greatest depth possible.
- Take into consideration the total estimated South Campus rooftop runoff volume and anticipated building greywater need when determining the final storage capacity of the cistern.
- Expand the capacity of the micro-bioretention areas by designing them to store the highest rainfall target technically feasible.

- Eliminate the Wellness Garden and utilize the area for additional pervious surface or ESD stormwater management, or at a minimum eliminate the proposed anti-climb fence and find a less intrusive way to secure this area.
- Utilize permeable pavements on all pedestrian paths, plazas, and courtyards where feasible.

Requests the applicant to provide the following information with its submission for final review:

- Responses to the Commission's suggested site and building plan modifications.
- Responses to any comments provided by the Montgomery County Planning Board and/or the Maryland-National Capital Park and Planning Commission staff.
- An updated stormwater management plan and narrative for the Centrum project, prepared in accordance with the Commission submission guidelines for final plan submissions and including final documentation of proposed ESD capacity / sizing and MDE and EISA compliance.
- A campus-wide stormwater management plan showing ESD opportunities and potential capacities on the North and South Campuses, potential outfall volumes and channel capacities, if available, and documentation, prepared in accordance with the EPA's guidance, addressing compliance with Section 438 of the Energy Independence and Security Act of 2007.

Notes that the applicant continues to work with interested and affected federal and state agencies, and interested community stakeholders, to address offsite stormwater runoff erosion and sedimentation damage caused during the previous occupancy of the site.

Notes that the applicant has recently completed a study to ascertain the impacts of offsite stormwater runoff erosion and sedimentation to adjacent National Park Service property pursuant to a Maryland Department of the Environment condition imposed upon the ICC-B North Campus final stormwater permit which requires the Defense Intelligence Agency, or its agent, to investigate, design, and construct repairs to downstream channels of the ICC-B.

Notes that progress is being made toward establishing a Memorandum of Understanding between the owner of the ICC-B site and the National Park Service for purposes of defining the working relationship between the two agencies for correcting downstream channel erosion and sedimentation to adjacent National Park Service property and **encourages** the applicant to finalize the Memorandum of Understanding prior to submitting the Centrum project for final review

Notes that the Defense Intelligence Agency has reaffirmed its commitment to seek all necessary funding to repair erosion and sedimentation damage to adjacent federal park land caused during the previous occupancy of the ICC-B site, and intends to make this commitment a part of the Memorandum of Understanding established with the National Park Service.

Deborah B. Young [Date]
Secretary to the National Capital Planning Commission

National Capital Planning Commission

401 9th Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel 202.482.7200 Fax 202.482.7272 www.ncpc.gov

IN REPLY REFER TO:
NCPC FILE NO. 7326

MAY 07 2013

Mr. Randy Winemiller
Chief
Real Property Service Field Office
Baltimore District, Corps of Engineers
Department of the Army
P.O. Box 1715
Baltimore, MD 21203-1715

Dear Mr. Winemiller:

The National Capital Planning Commission, at its May 2, 2013 meeting, approved the enclosed action on the preliminary site and building plans for the Intelligence Community Campus – Bethesda (South Campus), Centrum project. A copy of the Executive Director's Recommendation for the project is also enclosed.

Sincerely,

Marcel C. Acosta
Executive Director

Enclosure

cc: Rose Krasnow, Director of Planning, Montgomery County
Maryland-National Capital Park & Planning Commission
Tina Benajmin, Department of Economic Development, Montgomery
County Government