

October 20, 2010

Ms. Suzanne Hill, NEPA Program Specialist
Portfolio Management Division
Public Building Service
National Capital Region
U.S. General Services Administration
301 7th Street, SW
Room 7600
Washington, DC 20407

RE: Draft Environmental Assessment for the U.S. Department of Health and Human Services (HHS) Lease Consolidation in Suburban Maryland

Dear Ms. Hill:

Thank you for the opportunity to comment on the Draft Environmental Assessment prepared for the proposed consolidation of the U.S. Department of Health and Human Services. The City of Rockville is pleased that the General Services Administration is considering a location in Rockville for this facility.

The Irvington Centre is in Rockville's King Farm community. King Farm is a mixed-use development established in 1997. The neighborhood features a variety of amenities such as parks, retail and restaurant establishments, a hotel and a broad range of housing options. The residential units in King Farm include apartments, condominiums, townhomes and single-family homes. King Farm also hosts Montgomery County's first workforce housing project, designed to provide affordable housing for households earning up to 120% of the County's median income.

King Farm is located just over one mile from the Shady Grove Metro Station and public bus transportation provided by WMATA and Montgomery County. A shuttle runs on regular intervals from King Farm to the Metro Station. The neighborhood is adjacent to Interstate 270, MD Route 355 and Shady Grove Road. The Intercounty Connector is within one mile of the neighborhood. The future route of the Corridor Cities Transitway runs through the King Farm community to the Shady Grove Metro Station, providing yet another future transportation option for individuals working and living in the neighborhood.

Staff members from several City departments have reviewed the Draft Environmental Assessment and offer the following comments:

General

At the beginning of the document on page 2-4, the Irvington Centre at King Farm site is incorrectly identified as located in Gaithersburg, Maryland. The King Farm development is located entirely within the corporate limits of the City of Rockville.

Please also note that the Parklawn building has a Rockville mailing address, but is not located within the corporate limits of the City of Rockville.

3.12 Land Use Planning and Zoning

The zoning of the Irvington Centre site (900 and 901 King Farm Boulevard) is “Planned Development – King Farm.” The subject sites have the requisite zoning and land use designation in place to allow the proposed DHHS lease consolidation. Additionally the approved development plan for King Farm allocated more than a sufficient amount of office square footage to accommodate this proposal.

The 900 and 901 King Farm Boulevard sites currently have site plan approval, however an amendment is required to accommodate the proposed DHHS design details. The amendment process will involve review and action by the City’s Planning Commission.

3.2.10 Community Facilities

The Draft Environmental Assessment specifically notes the 30,000-acre Montgomery County park system consisting of community parks, trails, historic sites, and nature centers. The Assessment does not mention the City of Rockville park, recreation and open space resources that serve the King Farm neighborhood and are available to individuals living and working in the neighborhood. There are three City owned and maintained active parks totaling 45.89 acres with the following amenities:

- Play equipment
- Softball/baseball fields
- Lighted athletic fields
- Snack bar and restroom facilities
- Lighted tennis courts
- Lighted basketball courts
- Fitness cluster
- Walking/jogging paths
- Mattie J.T. Stepanek Peace Garden
- Public art installations
- Bankshot basketball
- Dog park
- Picnic shelter
- Picnic tables and grills
- Garden plots
- Off street parking

The King Farm community is also home to passive stream valley parkland (45 acres). These parks are all within one mile of the Irvington Centre site.

Additional City recreation amenities are just outside the King Farm neighborhood and easily accessible from the Irvington Centre site. They include a hiker/biker trail ten miles in length located approximately three quarters of a mile from the site and two community centers located within one and a half miles of the site.

3.6 Stormwater Resources

If the Irvington Centre at King Farm site is selected, a site plan analysis will be conducted, as noted under Land Use Planning and Zoning on page 2 of this letter. As part of the site plan analysis, a confirmation that the Piccard Pond is designed to manage the expected impervious area from the proposed project will be required. If there is a variation of more than 20% in increased impervious area between the Planned Development approval and the proposed project, the applicant may be responsible for follow-up engineering analysis and any retrofit to ensure the new complex provides adequate stormwater management treatment. If the engineering analysis demonstrates that Piccard Pond does not adequately treat stormwater for the new footprint, the following action may be required:

- Retrofit of the Piccard Pond,
- Addition of enough environmental site design practices onsite to make up the difference.

3.8 Vegetation & Wildlife

- 1) Sheet 3-32 mentions trees on the Irvington Centre – King Farm site. There are no sparse trees as stated, only grass and street trees.
- 2) A Forest Conservation Plan / Tree Save Plan will be required because the site is adjacent to a forest conservation area.

3.15 Traffic and Transportation

- 1) Section 3.15.2: The 1,500 critical lane volume (CLV) threshold for Irvington Centre is incorrect. The correct capacities of the four intersections listed in the Draft Environmental Assessment are as follows:
 - King Farm Boulevard/Piccard Drive – 1,600
 - Shady Grove Road/Choke Cherry Road – 1,550
 - Piccard Drive/Redland Boulevard (not “Road”) – 1,400
 - King Farm Boulevard/Frederick Road (MD 355) – 1,550
- 2) Section 3.15.1: The description of King Farm Boulevard correctly notes that there is a parking lane in each direction on the boulevard. The description should clarify that the lane is currently restricted to two-hour parking between the hours of 10 AM and 2 PM, Monday through Friday.

- 3) Section 3.15.3, Table 14: The Draft Assessment shows two intersections, King Farm Boulevard/Frederick Road (MD 355) and Shady Grove Road/Choke Cherry Road, operating at an unacceptable level of service during the evening peak hours when using 1,500 for the CLV. However, the City allows a CLV of 1,550 for both intersections. Therefore these intersections would operate at an acceptable level of service during the evening peak hours.
- 4) Section 3.18.2: Table 19 indicates that the Upper Rock Development will include 750 garden rise apartments. The correct figure is 744 apartments. The table excludes the office and retail uses planned for the Upper Rock Development. Table 19 should include 7,250 square feet of office and retail space.
- 5) Other nearby intersections, such as West Gude Drive/Piccard Drive, Gaither Road/Redland Boulevard, Gaither Road/King Farm Boulevard and West Gude Drive/Gaither Road were not included in the analysis and could be impacted.

3.16 Utilities

- 1) The Washington Suburban Sanitary Commission (WSSC) provides water and sewer service to the site. The City suggests that the applicant obtain confirmation from WSSC on the adequacy of the water and sewer infrastructure to serve the proposed development.

Thank you for the opportunity to comment on the Draft Environmental Assessment for this important development. We look forward to continuing to work with you on the site selection process. Should you have any questions, or require additional information, please contact Bobby Ray, AICP, Principal Planner in the Department of Community Planning and Development Services. He can be reached at 240/314-8228 or via email at bray@rockvillemd.gov.

Sincerely,

Phyllis Marcuccio, Mayor

cc: Scott Ullery, City Manager
Jenny Kimball, Assistant City Manager
Burt Hall, Director, Department of Recreation and Parks
Susan Swift, Director, Department of Community Planning & Development Services
Craig Simoneau, Director, Department of Public Works