

**MONTGOMERY COUNTY**  
**BRAC IMPLEMENTATION COMMITTEE**  
100 Maryland Avenue, 4<sup>th</sup> Floor  
Rockville, MD 20850

January 15, 2008

Honorable Isiah Leggett  
County Executive  
101 Monroe Street, 2<sup>nd</sup> Floor  
Rockville, MD 20850

Dear Mr. Leggett:

On behalf of the Montgomery County BRAC Implementation Committee (BIC), I respectfully transmit the attached memorandum of comments on the Navy's Draft Environmental Impact Statement (EIS) for NNMC BRAC in Bethesda. In addition, I am attaching comments from individual BIC members. We urge you to share these concerns when you submit the County's official response to the Navy as part of the EIS review process.

The BRAC Implementation Committee supports the mission of this BRAC action – to establish the Walter Reed National Military Medical Center in Bethesda, the flagship medical institution serving our country's servicemen and women. The County must work with the Navy to ensure that this unique action, which is taking place in an urban and well established community, be accomplished in a manner that respects its environment and sustains the mission.

The detailed memo is organized by the "Resource Areas" identified by the Navy in Section 4 of the Draft EIS:

:

- 4.0 General**
- 4.1 Geology, Topography, and Soils**
- 4.2 Water Resources**
- 4.3 Biological**
- 4.4 Air Quality**
- 4.5 Noise**
- 4.6 Utility Infrastructure**
- 4.7 Transportation**
- 4.8 Cultural Resources**
- 4.9 Land Use and Zoning**
- 4.10 Socioeconomics**
- 4.11 Human Health and Safety**
- 4.12 Cumulative Impacts**
- Appendices.**

Each Resource Area is divided into three sections:

- 1. A summary of the Consequences of the NNMC BRAC action on each Resource Area identified by the Navy in the Draft EIS;**
- 2. A summary of Proposed Improvement Measures identified by the Navy in the Draft EIS; and**
- 3. BIC Committee on the Draft EIS for each Resource Area.**

While all the Committee's recommendations are important, we want to bring to your attention the following major points:

- 1. Data is either lacking, inconsistent, unsubstantiated or poorly explained throughout the Draft EIS and particular relating to:**
  - a. Parking analysis: The report lacks data to support the number of spaces being provided.
  - b. Employment figures at NNMC: There exists conflicting information between the DEIS (8,000) and Navy web site (4,540).
  - c. Housing needs: The report lacks data on anticipated outpatient/family housing needs.
  - d. Patient and other trips to campus: There is no detailed data on who the visitors are or when they would travel to and from campus. This lack of data makes it difficult to predict housing or lodging needs or proposed traffic mitigations, especially in the design and implementation of a Transportation Management Plan.
  - e. In many instances the Draft EIS relies on studies that have not been provided, which prevents sufficient evaluation of the Draft EIS. These studies should be made available in the Final EIS to make the Navy's analysis more transparent.
  - f. Failure to consider impacts of major development projects in the region, especially in Bethesda.
  - g. Some background data is old and may not be up to date.
  - h. Current and projected traffic analyses lack a study of non-peak hour traffic.
- 2. The DEIS downplays and understates impacts on off-campus neighborhoods:**
  - a. Data lacking to support conclusion of negligible impacts in several resource areas, such as traffic, parking and air and noise pollution;

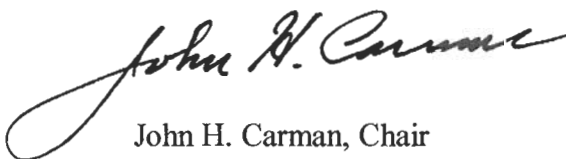
- b. Stronger mitigation recommendations are needed where impacts may be greater than projected;
3. **The Committee strongly disagrees with the DEIS dismissal of the applicability of Defense Access Road (DAR) grants.** This BRAC action will occur in a confined, urban and well established community along major access roads that are already heavily congested. It will add significant unanticipated traffic to the region, exacerbating congestion in a dense urban environment. This situation will certainly challenge the integrity of NNMCM's mission to establish a world class joint service military medical facility if doctors and patients are mired in gridlock and cannot gain timely access to urgent care. This situation will be more untenable considering the emergency medical and homeland security demands of NNMCM, NIH and Suburban Hospital. DOD has a responsibility to deal with these off-campus issues. It is short-sighted to dismiss the applicability of DAR funding to help ensure the success of this high profile critical mission.
4. **The Committee strongly disagrees with the DEIS dismissal of a proposed I-495 Beltway Slip Ramp directly to the NNMCM campus.** The DEIS does not recommend moving forward on this project. The Committee believes that a slip ramp directly to the NNMCM campus warrants an immediate and thorough study because, if feasible, it would relieve significant levels of congestion from local roads and serve as an evacuation route in a national emergency. Rather than dismissing this project, SHA should conduct a study to determine its feasibility and should address current congestion on I-495 between I-270 and MD97.
5. **The Committee believes that transportation studies must be considered comprehensively.** The I-495 Beltway Slip Ramp study, including a study of traffic along the Beltway between I-270 and MD97, should be conducted in conjunction with the MD355 Corridor Study that is to be conducted. In addition, the area of the MD355 Corridor Study should be extended north to Montrose/Randolph Roads and south to MD410.
6. **The Committee strongly supports the implementation of a robust transportation management plan (TMP) that discourages the use of single occupancy vehicles in the area of NNMCM.** The Draft EIS includes generic elements of a potential TMP but commits to nothing, waiting instead for a Master Plan. Since the elements of a Master Plan are already known, such as ongoing projects at USUHS and planned construction of

day care centers, NEX expansion and Navy Lodge, the Final EIS should include a site-specific TMP. At the same time, the Committee understands the unique problems of attempting to reduce traffic at a military medical facility that operates around the clock and believes the Final EIS should more strongly address ways to reduce traffic in the region that is not generated by Defense activities.

7. **The Committee is concerned that the Draft EIS dismisses potential traffic and pollution impacts on surrounding neighborhoods during the BRAC construction phase.** Past experience with similar projects has demonstrated significant impacts to neighborhoods from construction-related parking, traffic congestion, demolition and transport of hazardous materials, and air and noise pollution.
8. **The Navy must establish an ongoing Office of Community Liaison, similar to that of the National Institutes of Health, to keep neighbors informed of campus activities, particularly during BRAC construction phase.**
9. **Impacts must be mindful of non-BRAC related contingencies, especially impacts on emergency vehicles generally and those relating to the Bethesda Hospitals Emergency Preparedness Partnership (BHEPP) with NIH and Suburban Hospital.**
10. **While traffic and environmental mitigation are the top priorities, construction should be mindful of green space and livable communities wherever possible.**

We urge you to incorporate the points mentioned in this letter and in the attached documents when you craft your response to the Navy on behalf of Montgomery County. Again, we appreciate having the opportunity to participate in this important process.

Sincerely,



John H. Carman, Chair  
Montgomery County BRAC  
Implementation Committee

Two Attachments