



May 2, 2008

Officer in Charge - BRAC
National Naval Medical Center
8901 Wisconsin Avenue
Bethesda, Maryland 20889

Re: EBCA comments on NNMC FEIS

Dear Sir/Madam:

The East Bethesda Citizens Association (“EBCA”), representing the residential neighborhood immediately south of the National Naval Medical Center (NNMC), appreciates the Navy’s efforts under the BRAC to build the best, most modern medical facility for our service personnel. Our goal is to support the NNMC’s expansion plans by urging those responsible to “do it right” and providing local input into the process. By letter dated January 28, 2008, the EBCA provided the Navy with a thorough, 24 page list of comments (the “EBCA Comments”) to the Navy’s Draft Environmental Impact Statement (DEIS).

The Navy issued its Final Environmental Impact Statement (FEIS) on the BRAC on April 4, 2008. The EBCA appreciates the positive nature of the FEIS, the Navy’s commitment to certain mitigation efforts (such as limiting construction vehicle idling), and the Navy’s recognition that the expansion will have sufficient negative impacts on roads “outside the gates” to consider initiating the process to apply for certification under the Defense Access Road (DAR) program for two essential projects: constructing elevators from the Medical Center Metro to NNMC and constructing turn lanes into the main NNMC gate from MD 355. We also appreciate the forward looking approach of building facilities that meet the U.S. Building Council’s LEED Silver certification. These are first steps in the mitigation efforts and signify that the Navy considers the NNMC a stakeholder in the community and recognizes the significant traffic and safety problems that the new Walter Reed will face.

However, the Navy’s FEIS falls short of “doing it right” on traffic and safety mitigation in two obvious and related ways: (1) the Navy has made no commitments, only promises, as to traffic mitigation and pedestrian safety; and (2) many of the legitimate concerns raised in the DEIS response have been disregarded. Based on the comment matrix found in Appendix A Part I in the FEIS, the Navy appears to have made superficial use of traffic statistics to minimize the traffic and safety concerns, officially concluded that the traffic and pedestrian problems outside

the fence are state and county problems, and concluded that the Navy cannot and will not do much to mitigate those problems.

We believe that these decisions will rebound to the NNMC's detriment during and after the expansion, and result in further grid-lock, decreased air quality, and potentially unsafe working conditions for medical staff, patients, and visitors. The new Walter Reed may face user dissatisfaction and difficulty attracting and retaining quality medical personnel. In the end, the expanded medical facility can only work at optimal efficiency if the key proposed mitigations are implemented as soon as possible given the long lead time for such projects and the increased demand on the facility while our nation continues to be at war.

As grounds for the above, we incorporate by reference all the comments set forth in the EBCA Comments. In addition, we note that:

- a. The Navy's promise to initiate the application for DAR certification highlights that, to date, the Navy has not requested any additional funds for the NNMC BRAC in its Military Construction (MilCon) budget proposals submitted to Congress. Given that transportation projects typically demand long lead times, the promise to begin a process of applying for a certification indicates a lack of urgency.
- b. Even if DAR funds are obtained, the amount of DAR funds allocated will likely be at best a small percentage of the funds estimated by the Maryland Department of Public Works needed to mitigate the traffic and safety problems surrounding the new Walter Reed.
- c. Since these projects are deemed critical to overall success of the base, what is the Navy's contingency plan(s) if DAR funds are not appropriated for the two projects?
- d. In essence, promises to begin considerations have been made, but nothing has been committed, appropriated, or requested.

In our role as avid supporters of the NNMC expansion in a way that "does it right," we urge the following steps:

A. The Navy should strive for successful DAR certification of the identified transportation infrastructure projects. In addition, the Navy should make every effort to educate decision makers on the need to fully fund these and other critical infrastructure improvements in a timely and meaningful way.

B. The Navy and incoming command of the new Walter Reed should keep in mind the big picture of this expansion and should commit to adopting the following six mitigation measures as keys to the overall success:

1. Adopt a robust and meaningful Transportation Demand Management Plan that contains measures to mitigate traffic congestion on and around the base;

2. Support the State's plans to improve key intersections, such as the intersection of MD 355 and Jones Bridge Road;

3. Clarify that, either in addition to, or in connection with, the proposed metro elevator on the East side of MD 355, there will be created also a pedestrian tunnel under and/or a pedestrian bridge over MD 355 from the metro station to the NNMC. At a minimum, this will create necessary redundancy in providing safe access across Route 355. Also, clarify how this project will work in conjunction with the tunnel and/or bridge to connect NNMC, NIH, and Suburban Hospital – a proposal which pre-dates BRAC and for which consultants are currently developing plans;

4. Add a drop off/pick up area at the main Jones Bridge Road gate, similar to the drop off/pick up area now planned for the North Gate entrance;

5. At the Navy Lodge gate, expand the entrance from a single inbound lane to either two inbound and outbound lanes or with reversible inbound/outbound lanes in the AM and PM.

6. Adopt a formal rule that no transportation plans will be retained or approved that would increase traffic through the East Bethesda neighborhood and cooperate with the neighborhood's efforts to obtain restricted parking signage within the neighborhood.

In addition, we request that the Navy consider relocating the helicopter landing pad to the roof of Building B in order to utilize a more secure location, prevent traffic from being stopped and provide better usage of the frontage on Route 355 across from the NIH Visitor's Center. For example, this location near the Metro may be better suited for a drop-off/pick-up point.

As we have stated, we believe our concerns are your concerns: developing this area in an environmentally responsible manner; protecting the health and well-being of staff, patients and area residents; safe access to and from the base and around the area; and making this expansion work so that the mission can be fulfilled. We respectfully request that you review our concerns and incorporate them into the Record of Decision due to be signed in the coming weeks.

Thank you for involving us to date in this process. We look forward to continuing to work with you as the construction commences and the new Walter Reed emerges. Like you, we look forward to the eventual grand opening of the expanded Walter Reed National Military Medical Center, the centerpiece of military medicine in the National Capital Region. Like you, we are proud that our neighborhood will be home to the world's finest military medical center.

Sincerely,

Ilaya Rome Hopkins
President, EBCA

cc:

Senator Barbara Mikulski
Senator Ben Cardin
Congressman Chris VanHollen
Governor Martin O'Malley
Lt. Governor Anthony Brown
State Senator Brian Frosh
State Senator Rich Madaleno
State Delegate Bill Bronrott
State Delegate Susan Lee
State Delegate Bill Frick
State Delegate Ana Sol
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Montgomery County BRAC Coordinator Phil Alperson