



January 28, 2008

Rear Admiral Richard R. Jeffries
Medical Corps, U. S. Navy
Commander, National Naval Medical Center
8901 Wisconsin Avenue
Bethesda, MD 20889

Dear Admiral Jeffries:

This letter and attachments serve to convey Montgomery County's comments on the Draft Environmental Impact Statement (EIS) for activities to implement the 2005 Base Realignment and Closure (BRAC) actions at the National Naval Medical Center (NNMC) establishing the flagship Walter Reed National Military Medical Center serving our country's servicemen and women in Bethesda, Maryland.

Montgomery County proudly supports the mission of this BRAC action. The County and Navy must work as partners to ensure that the action fulfills its mission and is accomplished in a manner that is compatible with the NNMC's urban environment. Regrettably, the Draft EIS fails to acknowledge the significant and detrimental impacts of this BRAC action on the community that surrounds NNMC. Failure to acknowledge and take decisive action to mitigate impacts on the environment and transportation network will impede the mission of this BRAC action.

The attached comments from County agencies and our BRAC Implementation Committee detail many serious shortcomings of the Draft EIS, but we want to highlight here our most significant concerns:

- 1) Unlike nearly all of the hundreds of BRAC moves across the country mandated by the 2005 law, which relocates large numbers of military personnel and facilities to secure bases away from population centers, NNMC BRAC is bringing additional military functions into a densely populated and well established urban environment around the NNMC campus. This creates a set of very difficult problems requiring specific solutions that address these problems.
- 2) The Draft EIS understates many of the impacts on the region's environment and the transportation network that serves NNMC. This action will cause increased and substantial congestion in an already congested area around the expanded medical facility. If a patient, medical professional or emergency vehicle cannot reach the hospital in a timely manner because they are mired in gridlock, then the Navy's mission will have

failed. That clearly is not what the Navy or Montgomery County wants. The Navy should acknowledge that this move will have direct and significant impacts, and work to address those impacts.

- 3) In particular, dismissing the applicability of Defense Access Road (DAR) grants to NNMC BRAC is an incorrect judgment. Under the DAR program, the Department of Defense (DOD) must pay its fair share for improvements to public highways that experience a sudden or unusual defense-related traffic impact. This is clearly the case in Bethesda with NNMC BRAC, which will add 2,500 employees -- an approximate increase of 33 percent -- and double to approximately 900,000 the number of visits to the campus each year. The DOD criteria to provide relief where traffic has suddenly doubled because of expanded military base operations may be suitable for rural roads but are irrelevant to urban roads like many of those in Bethesda. Indeed, the "doubling" criteria are neither statutory nor rigid. Rather, the determination of eligibility for DAR funding is initiated by the on-base commander on a case-by-case assessment that road improvements are required and that local transportation authorities lack the resources to implement them. The Final EIS should offer the possibility of DAR funding and the Navy should take an active role in seeking DAR funding to address the issues with this move. Attached is information from the Congressional Research Service of the Library of Congress pertaining to the Defense Access Road program, including the statutes referred to above.
- 4) Important data is lacking, inconsistent, unsubstantiated or poorly explained in many instances. For example, the Draft EIS has not documented the number of military personnel, functions or outpatients that will be transferred from the Walter Reed Army Medical Center (WRAMC) to NNMC and how the relocation of current WRAMC personnel and patients to NNMC and Fort Belvoir reflect the care level-based distribution mandated by the 2005 BRAC law. These are among the figures that must be included in the Final EIS in order to address critical transportation and land use matters, such as mitigating traffic congestion and identifying housing needs on and near the base.
- 5) The Draft EIS downplays impacts on traffic in surrounding neighborhoods during and after the construction phase. By failing to properly assess the impacts of this BRAC action, the Draft EIS does not place proper urgency on essential transportation mitigation projects, some of which would qualify for DAR funding. A realistic assessment of consequences and potential improvement measures must be included in the Final EIS:
 - a. The MD 355 Corridor Study must be fast-tracked. It must include the intersection improvements recommended in the Draft EIS, the widening of MD 355 to include turn and through lanes, shoulders to provide access for emergency vehicles, pedestrian medians, and an evaluation of a grade separated interchange at MD 355 and Cedar Lane.
 - b. Construction of an entrance to the Red Line Medical Center Metro station on the east side of MD 355 would enhance transit use and provide pedestrian connectivity. This project must be fast-tracked as a short-term project. Alternatively, a pedestrian bridge may be constructed over MD 355 in full

compliance with the Americans with Disabilities Act (ADA). DOD may have a role in constructing this entrance because it provides direct access to and is located on NNMC property.

- c. The Draft EIS does not give proper consideration to transportation alternatives that would reduce single occupancy vehicles in the region. The Draft EIS did not include NNMC/WRAMC employee ridership statistics for the proposed Purple Line and Corridor Cities Transitway projects. The County is working with the Maryland Transit Administration on approved alignments for these planned projects and these statistics are an important element in moving these projects forward as stipulated in Montgomery County's Master Plan.
 - d. The Draft EIS does not address NNMC's responsibility to provide expanded shuttle bus service for its employees. NNMC should work with State and County agencies to identify suitable and appropriate outlying locations for park-and-ride lots that would serve NNMC shuttles. This is particularly important during the construction phase when on-site parking for construction workers will be limited.
 - e. Safe and convenient pedestrian access between the NNMC and NIH campuses is essential. Measures to ensure safe pedestrian access to and around the campus, including sidewalk and signaling improvements, must be a priority. The pedestrian/bicycle master plan for the area must be implemented in its entirety.
 - f. The Draft EIS dismisses a proposed I-495 Beltway Slip Ramp directly to the NNMC campus. MSHA should conduct an evaluation of the feasibility and benefit derived by providing slip ramps as part of its MD 355 Corridor Study. This long term project could help alleviate congestion on local roads that serve NNMC.
 - g. The Draft EIS projects a net increase of approximately 1,800 parking spaces, which would encourage more single occupancy vehicles (SOVs) and congestion in the area. The Navy should make its best effort to limit the number of parking spaces to conform to National Capital Planning Commission (NCPC) standards and must include a robust Transportation Management Plan (TMP) that discourages SOVs. 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, the Final EIS must include a site-specific TMP.
- 6) The Draft EIS does not address the issues of housing or lodging for outpatients and their families. One of the primary purposes of this BRAC action is to improve the care and treatment of wounded soldiers, many of whom suffer catastrophic injuries that require long-term care and rehabilitation. However, no supporting information is provided that planned on-campus housing facilities will be sufficient, and there is no provision for alternatives if it is not. The availability of convenient and affordable lodging and transportation to and from campus must be addressed.

- 7) The Draft EIS does not address impacts on Homeland Security. This is significant in any circumstance but especially as it relates to the Bethesda Hospitals Emergency Preparedness Partnership, the collaboration between NNMC, National Institutes of Health (NIH) and Suburban Hospital – the region’s designated trauma center – that has received substantial federal support to prepare for a national emergency in the National Capital Region. Measures to ensure the passage of emergency vehicles in the area should be addressed, including providing access for emergency vehicles across the NNMC and NIH campuses.
- 8) The Draft EIS does not address the need to provide open lines of communication between the Navy and the surrounding community. The Navy should establish an ongoing Office of Community Liaison, similar to that of NIH, to keep neighbors informed of campus activities during and after the BRAC construction phase so the community can be apprised of construction schedules and major events occurring on the campus that could impact the community.
- 9) The Draft EIS does not offer a commitment by the Navy to achieve Leadership in Energy and Environmental Design (LEED) standards set out in County law.
- 10) The County requires all government agencies to submit plans for development to the Maryland-National Capital Park and Planning Commission for review. We respectfully request that the Navy commit to make its best efforts to adhere to the recommendations that the Commission may identify as a result of this review.

We are attaching several documents from the following County agencies that support our conclusions about the Draft EIS. These documents contain well-considered comments and questions and we respectfully request that you provide a response to each of them:

- 1) Evaluation prepared by the Staff of the Montgomery County Planning Department of the Maryland-National Capital Park and Planning Commission (M-NCPPC) (Attachment 1);
- 2) Memorandum and Summary from Arthur Holmes, Jr., Director of the Montgomery County Department of Public Works and Transportation (DPWT) (Attachments 2a and 2b);
- 3) Memorandum from Stan Edwards, Chief of the Division of Environmental Policy and Compliance of the Montgomery County Department of Environmental Protection (DEP) (Attachment 3);
- 4) Memorandum and Comments from Thomas W. Carr, Jr., Fire Chief, Montgomery County Fire and Rescue Service (FRS) (Attachments 4a and 4b);
- 5) Comments prepared by the Montgomery County Department of Permitting Service (DPS) (Attachment 5);

- 6) Memo from Montgomery County BRAC Implementation Committee (BIC) (Attachment 6); and
- 7) Statement by Councilmember Roger Berliner (Attachment 7).

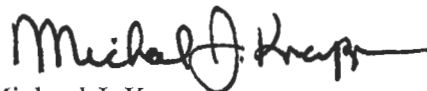
In addition, we are attaching a Memorandum and supporting material from the Congressional Research Service of the Library of Congress pertaining to the Defense Access Road Program (Attachments 8a-8e).

Montgomery County appreciates your careful consideration and thorough response to this letter and attached comments. We are proud of our role, and look forward to a cordial collaboration with the Navy to ensure the success of this mission, to provide the best medical care to our country's servicemen and servicewomen.

Sincerely,



Isiah Leggett
County Executive



Michael J. Knapp
President, County Council

cc: Congressional Delegation
Governor Martin O'Malley
Lieutenant Governor Anthony G. Brown
General Assembly Delegation

Eight Attachments