MEMORANDUM

TO: Mr. Richard Eberhart Hall, Secretary
Maryland Department of Planning

ATTENTION: Ms. Linda C. Janey, J.D., Assistant Secretary
Maryland State Clearinghouse for
Intergovernmental Assistance
Maryland Department of Planning

FROM: John D. Porcari, Secretary
Maryland Department of Transportation

DATE: January 25, 2008

SUBJECT: Maryland Department of Transportation Comments on the Draft Environmental Impact Statement (DEIS) for Activities to Implement 2005 Base Realignment and Closure Actions at National Naval Medical Center, Bethesda, Maryland – Maryland State Clearinghouse State Application Identifier number: **MDxxxxxx**

Thank you for providing the Maryland Department of Transportation (MDOT) with the opportunity to comment on the DEIS for Activities to Implement 2005 BRAC Actions at National Naval Medical Center, Bethesda, Maryland – Maryland State Clearinghouse State Application Identifier number: **MDxxxxxx**. This memorandum, along with the attached errata sheet from MDOT, the State Highway Administration (SHA), and the Maryland Transit Administration (MTA) provides the Department's response for comments on the DEIS. In addition, our Maryland State Clearinghouse Response Form recommendation is the standard comment code "R2", defined as being approved contingent upon certain actions as outlined in our comments.

We appreciate the Navy's continuing effort in identifying traffic mitigation opportunities for the area surrounding National Naval Medical Center (NNMC), and strongly recommend continued coordination on this effort to address mutual interests in serving increased traffic in, through, and around NNMC.

With regard to the funding of improvements, a focused effort needs to be maintained on overall financial responsibility and scheduled implementation. This will necessarily involve close coordination among State and County governments along with the Department of the Navy. As an example, traffic engineering improvements along MD 355 in front of the hospital will be undertaken by MDOT. To facilitate these types of improvements, NNMC should be prepared to participate by funding the relocation of the fence adjacent to MD 355 since it is on hospital property.

MDOT is also encouraging the continuing exploration of creative funding solutions. The NNMC Metro Station Eastside Entrance might be analogous to the funding of the Arlington National Cemetery Metro Station in the 1970's. The Arlington National Cemetery Station was not

considered a "community oriented station" to be funded under the tri-state compact funding mechanisms in place at the time, but a station of "national interest".

With the support of the Office of Economic Adjustment/Department of Defense, the case could be made for 100% Federal Funding of the Eastside Entrance, particularly if identified in the FEIS, as a needed element to improve transit access to NNMC.

The Eastside Entrance is located on 100% federal property, owned by the Department of Defense. In addition, the eastside entrance serves a "national interest" of care for "wounded warriors" and visits by families, friends, as well as military and family outpatients. Besides serving NNMC, this entrance would also serve the relocated Walter Reed Hospital, the Unformed Services unit, eastside bus drops headed to National Institutes of Health (NIH), and, depending on the design, patient and medical personnel movement between NNMC and NIH.

MDOT is supporting a WMATA's "preliminary engineering study" to determine the engineering feasibility and cost of the eastside entrance, the crossing of MD 355 by bridge or tunnel, and supporting bus and drop-off requirements on both sides of MD 355. MDOT recommends that NNMC include the Eastside Entrance in their Final EIS. This would provide a Record of Decision (ROD) that would expedite study, design, and construction of the eastside entrance as warranted.

WMATA may advise whether any other Federal or National interest stations, like Federal Triangle or Smithsonian were funded with 100% federal funds.

Additionally, Interstate Highway construction on National Park land and some federal lands was eligible for 100% Interstate Funding. Much of the WMATA Metro was funded through an Interstate Substitution to Transit, and elements of the METRO system may have also enjoyed 100% funding when crossing federal lands. WMATA may advise on this as well.

Once again, thank you for providing us this opportunity to review and comment on the December 2007 DEIS for BRAC Actions at NNMC. If you have any questions regarding this review, please contact Ms. Heather Murphy, MDOT's Deputy Director of Planning, by telephone at 410-865-1275, toll-free at 888-713-1414, or by email at hmurphy@mdot.state.md.us. Of course you should never hesitate to contact me directly, if you prefer.

Attachments

cc: Ms. Heather Murphy, Deputy Director, Office of Planning and Capital Programming, MDOT
Mr. Neil J. Pedersen, Administrator, State Highway Administration
Mr. Paul J. Wiedefeld, Administrator, Maryland Transit Administration

Maryland Department of Transportation
Review of DEIS for BRAC Actions at Walter Reed National Medical Center in Bethesda, Maryland

MDOT Agency	Item #	General Topic or DEIS Page #	MDOT Comment
MTA	**1**	General	In general, more detailed transit ridership, bicycle and pedestrian volume information needs to be provided in the Final EIS to address the increase of both inpatient and outpatient health care services on the NNMC campus. This information is needed to develop the necessary transportation improvement recommendations.
SHA	**2**	General	The DEIS acknowledges that the influx of jobs and increased activity on the NNMC Campus will cause a higher demand for improvements to the transportation network in the Bethesda area. The Navy's role in funding and/or partnering with the State of Maryland to implement these needed mitigation projects should be discussed in the FEIS. The timing and impacts of the traffic mitigation projects should be identified in the document. In addition, funding sources for these highway and transit improvements, including but not limited to Defense Access Road (DAR) funds, should be identified in the document.
MTA	**3**	General	Funding off-base transportation improvements is of concern to MDOT. The DOD states several times that needed off-base transportation improvements will not qualify for Defense Access Road (DAR) federal grants since this BRAC action does not constitute an "unusual impact". Even though the DAR Program defines an "unusual impact" on a quantitative level as a significant increase in traffic where volumes are doubled, there still seems to be a basis for considering this BRAC action as an "unusual impact" and applying for the funding due to the sheer volume of new employees and visitors and how it would overload the existing adjacent transportation infrastructure. Please see our comments in the cover letter. Specifically, the Navy should fund the relocation of the perimeter fence to facilitate transportation mitigation projects along MD 355 and provide any necessary right-of-way at no cost. Additionally, the Navy should explore funding options for the proposed Metro Station access.
MTA	**4**	General	There is a lack of detail regarding source information, trip distribution and projected modal split of the estimated 2500 daily BRAC employees (which includes the estimated 136 commuters due to Cumulative impacts) and the 1862 daily visitors. There are also inconsistencies with the number of current NNMC employees and visitors stated in the DEIS (almost double) compared to the numbers shown in the Navy web site. This information is critical since it forms the basis for future trips and traffic projections.

SHA	**5**	General	At a number of intersections, channelized right turn lanes, which are not long enough to provide either significant storage or much ability for right turning traffic to bypass the through queue, are shown as dedicated right turn lanes in Figures 3a and 3b. Critical lane analysis of these intersections, with the provided lane configurations, may therefore predict better operations at these intersections than is obtainable in the field.
SHA	**6**	General	The DEIS mentioned incorporating master plans of other agencies to provide a future assessment of the year 2011. Please confirm that this analysis includes: 1) The NIH Commercial Vehicle Inspection facility (completed) across from North Wood Road. This facility provides inspections for multiple federal facilities in both Maryland as well as the District. It currently draws significant heavy vehicle traffic – notably northbound left-turns, whereas minimal left-turn provision is provided. 2) The new NIH visitor access (not yet opened to traffic) between South Drive and Center Drive / Jones Bridge Road. Our understanding is that this will be the sole visitor access to the NIH property. It may significantly increase U-turn traffic at each of the signals to the north and south.
MDOT	**7**	General	The DEIS includes potential Transportation Demand Management strategies. The FEIS should include specific strategies that will be implemented. Employee parking strategies should be developed, to mitigate traffic impacts and promote transit ridership.
MDOT	**8**	General	The Navy should consider options for gate operations to mitigate traffic impacts, such as creating visitor- and/or employee-only entrances. The Navy should also consider moving the gates further from the highway right-of-ways to avoid stacking.
SHA	**9**	Public Transit & Pedestrians	NNMC should support completion of bicycle and sidewalk projects included in the DEIS. Include Accessible Pedestrian Signals (APS) among the recommended pedestrian modifications.
SHA	**10**	Public Transit & Pedestrians	If a subterranean connection is created between NNMC, NIH, and WMATA: ensure that pedestrian connectivity is maintained such that a pedestrian may traverse MD 355 without having to pay for a fare card.
SHA	**11**	Public Transit & Pedestrians	In addition to parking incentives for higher-occupancy vehicles such as vanpools and carpools, consider parking and other incentives targeting motorcycles and mopeds. The reduced size and increased maneuverability of such vehicles can place less strain on transportation infrastructure, and increased fuel efficiency can reduce environmental and energy impacts.

Maryland Department of Transportation
Review of DEIS for BRAC Actions at Walter Reed National Medical Center in Bethesda, Maryland

SHA	**12**	Purple Line	Change any references in the document as the "Bi-County Transitway" to the "Purple Line."
SHA	**13**	Purple Line	In addition to the light rail transit alternatives, the Purple Line study is also considering bus rapid transit (BRT) alternatives. Specifically, one of the studied BRT alignments follows Jones Bridge Road and connects into the Medical Center Metro Station. The Purple Line will provide transfer access at: Silver Spring (MARC Brunswick Line / WMATA Red Line), College Park (MARC Camden Line / WMATA Green Line), New Carrollton (MARC Penn Line / WMATA Orange Line / AMTRAK).
SHA	**14**	Purple line	Operational authority of the proposed Purple Line has not been determined at this time. Please note the following in future documents: 1) If the Purple Line is operated by the Maryland Transit Administration (MTA), MARC riders may be permitted free transfer to the Purple Line. 2) If the Purple Line is operated by WMATA, Metrorail riders may be provided with discounted Metrobus service. A policy would need to be developed for transfers from the Purple Line to WMATA Metrorail.
SHA	**15**	Truck Trips	Regarding the trip distribution, it appears that a total 27% of trips are coming from the northwest area, which includes the northern portions of MD 187 as well as areas serviced by I-270. 22% of the total trips are assigned to MD 187. Please elaborate on the rationale used to assign a significant portion of traffic to MD 187 rather than along the I-270 east spur to southbound MD 355.
MTA	**16**	DEIS, ES-13, 2-25	Within the *Executive Summary – Socioeconomics Section*, there is mention that an increase in local employment of between 5,500 and 5,600 would be expected as a result of construction of the BRAC actions, but there is no mention of transit service additions or adjustments as a result of this temporary impact. On page 2-25, it does mention that there will be greater reliance on mass transit during construction, but no suggestions for mitigation are given.
MTA	**17**	DEIS Section 3.7.7, 3-43 to3-46	More consideration should be given concerning the existing service and operations of the Bethesda Circulator Shuttle Bus, as this could c be a resource to mitigate traffic impacts and promote mobility options for employees.
MTA	**18**	DEIS Section 4.7, 4-36 to 4-56	The baseline traffic estimates used for this DEIS are substantially lower than those derived from the M-NCPPC study for the prior five years. This issue needs to be investigated before transportation recommendations can be programmed.

SHA	**19**	DEIS, ES-20 2-32 4-50	SHA appreciates the Navy's willingness to assist with planned improvements to Rockville Pike as stated in the DEIS: *"Add an additional lane in each direction along Rockville Pike, per recommendation of the 1990 Bethesda Chevy Chase Master Plan. NNMC Bethesda will cooperate by providing frontage along MD 355 to accommodate the implementation of this measure if the State of Maryland and Montgomery County determine it appropriate to implement. Appropriate real estate easements would be coordinated and implemented to permit widening of Rockville Pike."* In addition, we request that the Navy consider similar assistance for short term improvements to MD 355 as well as to other State and local roadways should they be needed to mitigate for BRAC impacts.
MDOT	**20**	DEIS, ES-20	The Navy should fund the relocation of the perimeter fence to support planned improvements along MD 355, which will mitigate long-range BRAC traffic impacts, as well as potential short-term impacts.
SHA	**21**	DEIS, 2-32 and 4-51	The Coalition of Navy Med Neighbors has requested the study of a dedicated entrance/exit to the base from the I-495 Inner Loop as the highest priority to decrease the amount of traffic on arterial roadways surrounding the base. The Navy has identified "potential I-495 Slip Ramp Access" as a long-term regional issue, rather than an improvement related to mitigation and suggests that the Slip Ramp Access may not be feasible. Given the limited operational effectiveness of direct access ramps on local traffic congestion due to several identified traffic flow and safety concerns, and the environmental constraints associated with a new access point, it is highly unlikely that the SHA would be able to obtain approval from FHWA for a new Beltway access point at this location.
MTA	**22**	DEIS Section 4.7.4, 4-51 to 4-52	Please provide information on: o Specific commitments to implement the Transportation Management Plan (TMP). This document needs to be closely coordinated with MTA, as well as SHA and Montgomery County. It needs to be on an aggressive schedule, in line with the NNMC Master Plan, and project responsibilities listed in the Plan need to be determined. o An additional measure for patient and employee drop-off areas both inside and outside the gate access points should be considered. This could foster ridesharing and vanpooling for vehicles that do or do not need to obtain security access onto the base. A logical location point for a pull-

			off zone would be off of MD 355 adjacent to the pedestrian walkway that connects the Medical Metro Station to NNMC. o Wording to address the ongoing Purple Line Study, from a regional transit access standpoint should be included. o Analysis of NNMC employee commuter origins should be included, to better assess transit demand impacts and potential mitigation.
MTA	**23**	DEIS Section 4.12	Foreseeable future projects are listed, and on p. 4-73, next to last bullet, it states that: " a planned Metrorail link in the southwest corner of the installation near the southern Rockville Pike security gate". The term "Metrorail link" needs to be defined. Also, is the "southern Rockville Pike security gate" the same as the "South Wood Road" security gate mentioned several times in the DEIS, as well as the following bullet?
MTA	**24**	DEIS, 4-73	MTA was under the impression that the Metrorail link and the pedestrian connection between the NIH campus and NNMC would be tied together as one project on identical alignment. The two bullets seem to come across otherwise.
SHA	**25**	DEIS, 4-73	Under the DEIS Cumulative Impacts Section on page 4-73, the Navy describes the Grief Road Commercial Vehicle Inspection Facility that would be a commercial vehicle inspection station on NNMC. What is the likelihood and timing of the creation of this facility? The DEIS should consider traffic relief this facility would provide in relation to the additional traffic from the alternatives.
SHA	**26**	DEIS, Figures 3a & 3b on pgs 9 & 10 and pg 51	The DEIS recommends provision of a dedicated southbound right turn lane for the intersection of Connecticut Avenue and Jones Bridge Road, but the existing conditions diagram in the DEIS shows that the southbound right turn lane is separated. It appears the Navy is interpreting a channelized right turn movement as a right turn lane, but the lane does not provide storage, and is therefore not actually a separate right turn lane. Please clarify or explain what appears to be a contradiction in the DEIS.
SHA	**27**	Appendix C, pages19 and 21 Figures 4 and 8	With the direction of congestion along the major routes shown on page 19 and the truck traffic percentages shown on page 21, SHA believes locating an inspection facility at Grier Road would reduce the amount of NNMC traffic entering the South Gate entrance during the AM and PM peak periods.

SHA	**28**	Appendix C, pages19 and 21 Figures 4 and 8	SHA suggests that the Navy investigate timing its deliveries to avoid the peak congestion. An example would be re-timing its deliveries that use WB Jones Bridge Road during the AM (see Table 4, 20.9 % truck traffic in the AM peak) coinciding with congestion being greatest along Jones Bridge Road west bound during the AM peak.
SHA	**29**	Appendix C, 23 Figure 8	A routing diagram for heavy vehicles was identified. Please provide a similar diagram indicating the proposed routing of visitors (or if visitors may use any access, please indicate such).
SHA	**30**	Appendix C, 39	Please show the locations of the potential park and ride lots for vehicles at I-495/Kensington Parkway and River Road, from west of the Cabin John Fire Station No. 10 west of Seven Locks Road.
SHA	**31**	Appendix C, Table 4 on pg 21 and Figure 17 on pg 53	The percentages of trucks using MD 355 and Jones Bridge Road, eastbound and westbound for each roadway, from the MD State Highway Administration are shown in Table 4 on page 21. Figure 17 on page 53 shows the percentage of all NNMC inbound and outbound trips on external roadways. Please include the amount of NNMC inbound and outbound truck traffic along these same external roadways on a new figure. This will help demonstrate the magnitude of NNMC truck traffic on Rockville Pike and the South Wood Road entrance.
SHA	**32**	Appendix C, 21-23	Consider adjusting internal routing to make use of the signal at South Drive / South Wood Road, rather than increasing demand on the unsignalized North Wood Road intersection. The North Wood Road intersection is located approximately 650 feet from the signal at Cedar Lane – a less than desirable distance for a potential new signal installation.
MTA	**33**	Appendix C, 66-67	There are no transit improvements mentioned under the *Potential Mitigation Measures to Address Impacts from NNMC Actions* subsection (4.5.1). Transit improvements should be included as a potential mitigation strategy. Some of these recommendations are listed in the next subsection entitled: *Potential Long Term Improvements (4.5.2)*, but they should be moved up to *Section 4.5.1*. Transit recommendations listed as "long term" that can remain there include: o A bridge or tunnel pedestrian connection between the Metro Station and NNMC, which would eliminate pedestrian exposure to the Rockville Pike traffic o Improve bus service by providing real-time next bus information at all bus stops in the vicinity of NNMC Include a new transit recommendation here that discusses the evaluation of Commuter Bus Service routes directly into NNMC.

MTA	**34**	Appendix C, pp. 70-74	M-NCPPC has gone on record stating that there is an obvious need for transit improvements as a result of the BRAC actions. MTA supports their request for the Naval Hospital to provide innovative strategies for ride-sharing programs, for park and ride lots, for parking management, and for guaranteed rides home. These recommendations are contained in the TMP, but more detail is needed regarding the implementation strategies for these programs and recommendations. The FEIS should contain more detailed recommendations and specific implementation timeframes, regardless of the timing of the completion of the Master Plan.