

SCOPING COMMENTS ON ENVIRONMENTAL IMPACT STATEMENT

NATIONAL NAVAL MEDICAL CENTER EXPANSION, BETHESDA, MARYLAND

The Action Committee for Transit is a citizens organization of nearly 1000 members, most of whom live in the communities surrounding the Bethesda Naval Medical Center complex: Bethesda, Chevy Chase, Silver Spring, and Kensington. The purpose of our organization is to promote the use of transit in Montgomery County and to encourage transit-oriented land use that enhances our communities.

The proposed expansion of the National Naval Medical Center will have severe impacts on a community that is already suffering from the negative environmental effects of suburban sprawl and overuse of the automobile. It is essential that the Environmental Impact Statement evaluate alternative means to (a) minimize further negative impacts on the already severely stressed local transportation system and on surrounding communities and (b) mitigate those impacts that are unavoidable by relieving some of the existing stresses on the area's transportation system and built environment.

The EIS must develop and analyze a spectrum of alternatives, representing distinct development and transportation strategies for implementing the base expansion. One or more alternatives that construct a new-urbanist built environment and rely primarily on mass transit and pedestrian access must be considered, alongside an equal number of alternatives that create a suburban office-park built environment and rely primarily on automobile transportation. The requirements of NEPA would not be satisfied by developing only office park-automobile alternatives supplemented with a list of potential mitigation measures, because the elements of transit-oriented design and new urbanist planning work together synergistically and, with proper planning, the whole can be much more than the sum of the parts.

The following elements should be considered for inclusion in the transit-new urbanist alternatives:

- Cluster new construction at the southwest corner of the site, close to the Metro Red Line and the urban environment of downtown Bethesda.
- Provide no additional parking, or only a small amount of new parking.
- Increase the amount of on-base housing.
- Encourage pedestrian movement along Rockville Pike and Jones Bridge Road by moving sidewalks 4 to 8 feet back from the road and reconfiguring the roads in an urban boulevard style with narrower traffic lanes and landscaped islands.
- Open a new entrance to the Medical Center Metro station at the northeast corner of Rockville Pike and Jones Bridge Road.
- Move the security fence back from the two roads and erect (possibly via public-private partnerships) multi-story mixed use buildings outside the fence with the Navy Exchange and other retail uses on a street-facing ground floor and housing for base employees on the upper floors. (Housing for patients' relatives might also be provided, similar to the Childrens' Inn at NIH.)

- Build Dupont Circle-style underpasses for Rockville Pike at its intersection with Jones Bridge Road and, if feasible, at Center Drive or Cedar Lane.

Transit-new urbanist alternatives that include such elements offer numerous advantages for the base and for the surrounding community:

- Greatly reduced traffic generation by the base, plus additional traffic mitigation by making the Medical Center Metro station more accessible to residences in East Bethesda and along Battery Lane.
- Compatibility with surrounding land uses through design that is consistent with downtown Bethesda. Wisconsin Ave./Rockville Pike would form a harmonious whole extending from Bradley Boulevard to beyond Center Drive. The highly incompatible strip mall-style Navy Exchange would be replaced with a more pedestrian-oriented mixed-use structure that matches its environment.
- Improved connectivity within NNMC and between NNMC and NIH by making pedestrian travel more comfortable, safer, and faster.
- Congestion-free travel to the Walter Reed Annex, the University of Maryland, and the FDA College Park facility by entering Metro at Medical Center and connecting to the future Purple Line at Bethesda.
- Preservation of trees and no incursion into wetlands.
- Better integration of NNMC into the surrounding environment.
- Improved security by placing sturdy multistory buildings between public roads and the security perimeter.
- Less vulnerability of NNMC operations to future disruptions in petroleum supply.
- Access to affordable housing for employees, and reduced base impact on the extremely limited stock of affordable housing in nearby communities.
- Reduction of vehicle noise and visual impacts on base employees by traffic calming on Wisconsin Ave. and Jones Bridge Road and by locating new buildings as distant as possible from the Beltway.
- Employee access to restaurants and stores in downtown Bethesda.

In sum, the transit-new urbanist approach offers the opportunity to create a high-quality built environment at the Naval Medical Center that is worthy of NNMC's importance to the Armed Forces and to the nation.

Finally, we note that the National Capital Planning Commission's parking guidelines should be followed.