

January 28, 2008

The following comments are submitted to the BRAC program manager at Bethesda Naval on behalf of the Action Committee for Transit.

The EIS fails to meet the legal requirement of considering alternatives and otherwise fails to meet minimum legal requirements.

Specifically:

- The fundamental legal requirement to analyze alternatives was not met because the two so-called alternatives analyzed in the EIS are identical as regards the fundamental issue of traffic and transportation impacts – both include the same number of new parking spaces, and both are premised on a shift away from public transit access and toward automobile access. The 1800 parking spaces that the Navy assumes are far more than the 2200 new employees (many working weekends and shifts) and new hospital visitors will need..
- ACT's 'new urbanist' transit-oriented alternative, including development of housing and services for the additional hospital personnel in order to minimize traffic impacts was not considered or analyzed. The EIS's rationale for not analyzing the alternative of providing additional military housing outside the security perimeter contradicts current practice in southern Montgomery County. Such housing exists today in the vicinity of the Walter Reed Annex.
- The proposed 1800 parking spaces are in violation of MCPC parking guidelines. Sites close to metro stations have lower guidelines for parking space provisions than the current plan. We are at a loss to understand why the Navy is unwilling to comply with these guidelines or even explain why they should not be complied with. In fact, the EIS states (Appendix C, p. 34) that there are currently 1434 unused parking spaces on the facility, so there is no need for any new parking whatsoever.
- The Navy failed to consider the alternative of abating traffic by building an entrance to the Medical Center Metro station on the Bethesda Naval side of Rockville Pike.

The assumptions made in the EIS are contrary to the facts, as explained in Appendix C of the EIS itself. According to the EIS (Appendix C, page 50), if new employees generate commuting and visitor trips at the same rate as existing Bethesda Naval employees, the proposed 2200 new employees would put 418 cars on the road during the most congested 60 minutes of the evening rush hour. The ACT proposal would further reduce this number by clustering buildings near Metro and making transit more accessible. But the

EIS projects 921 auto trips during that hour - more than double the number generated by an equal number of current employees.

A particularly egregious example of the overestimation of parking requirements is the assumption that one parking space is needed for every Fisher House residential unit. (EIS, p. 2-37) The EIS provides no information on the actual parking usage by the current Fisher House residents. Our understanding is that the vast majority of Fisher House residents do not bring a car to Bethesda.

The WMATA survey attached to Appendix C of the EIS shows that for office uses between 0 and 0.25 miles from a Metro station, the automobile mode share ranges from 48% to 66%. The EIS failed to consider these facts in its analysis.

It is legally impermissible for the Navy to base an EIS on assumptions that it knows to be contrary to the facts.

Finally, ACT strongly supports the Navy's rejection of a Beltway ramp dedicated to the Bethesda campus.

ACT is deeply concerned by a process that seeks to accommodate the needs of cars rather than those of people or area residents. The issue here is not just the *additional* commuters to Bethesda, but the way in which the proposal is accommodating them that encourages them to drive to work. As such State and County taxpayers are being expected to subsidize a lifestyle that they, themselves, have had to forgo. Furthermore, the current proposal runs counter to the logistical, financial and security needs of those working on or living near the Bethesda campus for two additional reasons:

- In the current economic environment the financial costs of commuting by car are prohibitively expensive for many military personnel, given the high price of local housing and the costs associated with long commutes.
- Encouraging more people to commute to the campus by car runs counter to the Base's efforts since September 11<sup>th</sup> to tighten campus security.

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