

Appendix H

Draft EIS Comment

This Appendix contains written comment on the Draft Master Plan 2003 Update EIS during the NEPA review process. Oral comment received at the public hearing held on November 8, 2004, is summarized in Section 6.2.

The comment or correspondence appears on the left hand page. Where appropriate, annotated NIH responses to questions or explanatory comment appears on the right hand page.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

November 29, 2004

Mr. Ron Wilson
National Institutes of Health
Division of Facilities Planning, ORF
31 Center Drive, Room 3B44, MSC 2162
Bethesda, MD 20892-2162

Re: National Institutes of Health (NIH) Master Plan 2003 Update, National Institutes of Health Main Campus, Bethesda, Montgomery County, MD (CEQ #040458)

Dear Mr. Wilson:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the National Institutes of Health (NIH) Master Plan 2003 Update, National Institutes of Health Main Campus, Bethesda, MD. EPA has assigned this DEIS a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of the project. A copy of EPA's ranking system is enclosed for your information.

EPA understands that the proposed action is the Master Plan 2003 Update of the 1995 Bethesda campus Master Plan. As a result, the Plan would guide and coordinate physical development of the NIH Bethesda campus in terms of buildings, utilities, roads and streetscape, landscapes, and amenities over the next 20 years in response to projected NIH administrative, research, and infrastructure support needs. It is important to note that which is stated within the DEIS (page 1-10), "When individual major projects are proposed for construction, project specific environmental documentation and NEPA public involvement will be completed, where warranted." Because of the scope of the projects anticipated, EPA has the following comments which we would like to see addressed in the Final Environmental Impact Statement (FEIS).

Stormwater Management/Low Impact Development (LID)

One of the principal features of the Master Plan is the management of stormwater through a site Institutional Stormwater Management Plan (ISMP) that will meet Maryland standards throughout the campus. The DEIS states that the actual campus impervious area is projected to decrease under the Master Plan; however, the ISMP impervious area for computation of stormwater management requirements will increase. It is projected that a conservative increase of 43.0 acres would be converted from pervious to impervious surface by Master Plan development. As noted in the DEIS, the ISMP proposes management with two facilities: the North SWM facility and the proposed South Pond.

(1)



(1) It is estimated that implementation of the Master Plan Alternative will reduce the net campus impervious area from 129 to 102 acres, approximately. Stormwater management quantity and quality control facility requirements were computed assuming a 43 acre increase in impervious area to ensure that facilities would be adequate and all future contingencies could be met.

EPA encourages the NIH to utilize LID practices as it is a natural approach to land development and stormwater management designed to reduce impacts on watershed hydrology and aquatic resources. It is important to incorporate LID efforts to mitigate the effects of development through traditional stormwater management practices which have proven to not be entirely successful. Traditional collection and conveyance systems, stormwater ponds and other stormwater facilities do not replicate natural systems, which greatly slow water before it reaches streams, wetlands and other waters. Development often times results in the loss of trees and other vegetation, the compaction of soils by heavy equipment, and the creation of vast stretches of connected impervious areas. These combined factors are extremely difficult to compensate for using traditional practices. Prior to the development of any structural stormwater practices on a site, significant reductions in stormwater quantity and quality impacts can be made through enhancements to site design. As a result, the following site design goals and planning practices can be used to minimize stormwater impacts.

(2)

- Design Goal: Minimize direct stormwater impacts to streams and wetlands to the maximum extent practicable. Practices: 1. locate stormwater facilities outside of streams and wetlands; 2. maintain natural drainage routes on site; 3. preserve riparian buffers; and 4. distribute Integrated Management Practices (IMPs) used in lieu of centralized ponds.

- Design Goal: Preserve the natural cover on as much of the site as possible, especially for areas located on hydrologic soil groups (HSG) A and B. Practices: 1. utilize clustered development designs that preserve a significant portion of the site in a natural state; 2. utilize "fingerprint" clearing by limiting the clearing and grading of forests and native vegetation to the minimum area needed for the construction of the lots, the provision of necessary access, and fire protection; 3. avoid impacts to wetlands or vegetated riparian buffers; and 4. preserve A & B soils in natural cover.

- Design Goal: Minimize the overall impervious cover. Practice: 1. utilize the minimum required width for streets and roads; 2. minimize excess parking space construction, utilize pervious pavers in low-use parking areas; 3. utilize structures or shared parking; 4. where permitted, minimize sidewalk construction by utilizing sidewalks on one side only, utilizing "skinny" sidewalks, or substituting sidewalks with pervious trails through common greenspace; 5. substitute pervious surfaces for impervious wherever possible; 6. where permitted, avoid the use of curb and gutter and utilize vegetated open swales, preferably "engineered swales" with a permeable soil base; and 7. minimize compaction of the landscape and in areas where soils will become compacted due to construction equipment, specify that the soils will be "disked" prior to seeding, and amended with loam or sand to increase absorption capacity.

- Design Goal: Locate infiltration practices on HSG A and B soils wherever possible. Thus, every effort should be made to utilize areas with these soils for IMPs that promote infiltration.

(2) NIH has used Low Impact Development (LID) practices for many years prior to formalization of the program. Many small management facilities installed under individual projects are located around the campus, but are not identified at the broad scale master plan level. For example, the new South Drive entrance on Rockville Pike has a bioretention cell that intercepts and detains stormwater runoff from roadways in the entrance area prior to release to the campus system. Campus master plans since the 1980s have emphasized retention and expansion of natural campus areas, particularly the perimeter buffer, and natural buffers near site streams. Specific references to LID practices have been added to the Master Plan 2003 Update and this EIS. Many of the design goals listed here were factors considered in the planning process and development of the Master Plan. (See EIS Section 4-2 and Master Plan Section 2.6). For example, clustering of development, structured parking, the perimeter buffer, and riparian buffers along the campus streams.

- Design Goal: Locate impervious areas on less permeable soils (HSG C and D). Placement of impervious areas on lower permeability soils minimizes the potential loss of infiltration/recharge capacity on the site.

- Design Goal: "Disconnect" impervious areas. "Disconnecting" means having impervious cover drain to pervious cover. This decreases both the runoff volume and time of concentration.

- Design Goal: Increase the travel time of water off of the site (time of concentration). Practices: 1. flatten grades for stormwater conveyance to the minimum sufficient to allow positive drainage; 2. increase the travel time in vegetated swales by using more circuitous flow routes, rougher vegetation in swales, and check dams; and 3. utilize "engineered" swales in lieu of pipes or hardened channels.

- Design Goal: Utilize soils management/enhancement techniques to increase soil absorption. Practices: 1. delineate soils on site for the preservation of infiltration capacity; and 2. require compacted soils in areas receiving sheetflow runoff (such as downslope of downspouts).

- Design Goal: Revegetate all cleared and graded areas with native and noninvasive species.

- Design Goal: Utilize level spreading of flow into natural open space.

For additional and more comprehensive LID information, please refer to the following web sites.

- LID Manuals:

http://www.epa.gov/owow/nps/lid_hydr.pdf

<http://www.epa.gov/owow/nps/lidnatl/pdt>

- <http://www.bmpdatabas.org>

- <http://www.txnpsbook.org/>

- <http://www.epa.gov/ednrrmrl/>

- Combined Sewer Overflows Guidance For Monitoring and Modeling Document Type, Published: 1/1/99 <http://www.epa.gov/npdes/pubs/chap05-cso.pdf>

Terrestrial Resources

The DEIS states (page 5-165) that approximately 500 mature trees with a caliper of 10 inches or greater could be lost if all Master Plan facility proposals are implemented. The DEIS also states that "It is the intent of the NIH to prepare a campuswide Tree Conservation Plan." Thus, project plans would include mitigation and replacement plans as noted in the DEIS. However, the FEIS should specify the function and value of the existing hardwoods as well as outline the mitigation and replacement ratio to be implemented.

(3)

(3) The Draft EIS text noting the estimated loss of 500 mature trees with a caliper of 10 inches or greater has been corrected to read six inches caliper. New text summarizing campus tree function and value has been added to Section 5.9.3. NIH has had a long term policy of replacing trees lost on at least a one for one basis as noted in the Draft EIS. NIH has prepared a Draft Urban Forest Stand Delineation and Conservation Plan meeting State standards. The plan is currently in the review process, and it is expected that it will be finalized in 2005.

Thank you for the opportunity to review and comment on this project. If you need additional assistance, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

A handwritten signature in black ink, appearing to read 'William Arguto', with a stylized flourish at the end.

William Arguto
NEPA Team Leader

Enclosure



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www.ncpc.gov

Commission Members

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John V. Cogbill, III, Chairman
Richard L. Friedman
Jose L. Galvez, III

Mayoral Appointees

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The Honorable Gale A. Norton

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Committee on Governmental Affairs
United States Senate
The Honorable Susan M. Collins

Chairman

Committee on Government Reform
U.S. House of Representatives
The Honorable Tom Davis

Mayor

District of Columbia
The Honorable Anthony A. Williams

Chairman

Council of the District of Columbia
The Honorable Linda W. Cropp

Executive Director

Patricia E. Gallagher, AICP

IN REPLY REFER TO:
NCPC File No. MP02

NOV 15 2004

Mr. Ron Wilson
National Institutes of Health
Division of Facilities Planning, ORF
31 Center Drive, Room 3B44, MSC 2162
Bethesda, Maryland 20892-2162

Dear Mr. Wilson:

Thank you for the opportunity to participate in the review of the Environmental Impact Statement (EIS) concerning the proposed Master Plan Update for the National Institutes of Health (NIH) Bethesda, Maryland Campus. The EIS is being prepared, as a federal regulation requirement, on the whole of the 310-acre facility including all of its various structures and its historic district. These EIS comments are limited to the Commission's role as the central planning agency for the federal government in the National Capital Region and express our general views on planning and environmental issues.

With the above as background, my comments on the federal EIS document address four topics of the proposed master plan evaluation.

To begin, the review and information present in the draft EIS regarding transportation management objectives under the new master plan employee population-base is of concern to the Commission. The levels of employment clearly are defined by the programs approved and funded by the Department of Health and Human Services. Moreover, the EIS defines the missions established by NIH regarding the additional research and staffing required by the various new medical initiatives being pursued by NIH. NCPC staff commends NIH on the comprehensive discussion of the overall purpose and need of the master plan update. Nevertheless, the current EIS data falls short in acknowledging any attempt to comply with the new parking ratio requirements of the Commission adopted in August 2004 and which were announced many months earlier. Also this omission has possibly been short-sighted in the potential impediment facing NIH concerning single-occupancy vehicles being accommodated in its future planning, and the air quality issues facing the Washington metropolitan region.

(1)

(1) See new text in Section 5.3.8.

The situation is due to the parallel and independent development of the Bethesda campus Master Plan 2003 Update by NIH, and the development of an update of the Comprehensive Plan for the National Capital Region, Federal Facilities Element by NCPC.

The new 0.33 employee parking ratio goal for federal facilities in suburban areas within 2,000 feet of Metrorail stations (a new category of facility in the Washington region for determining the goal) was proposed in the draft version of the Comprehensive Plan, which was circulated for public review and comment. The new goal would become applicable when agencies updated their Master Plans. NIH noted its review comment letter sent to NCPC on May 17, 2004, that the proposed ratio goal was not achievable based on over a decade of experience with its current Bethesda campus TMP.

At the time when the comment letter was sent, all master planning and impact assessment analysis related to parking and traffic impacts were completed. Planning and analysis were based on the employee parking ratio goal of 0.50 indicated for suburban facilities in the 1989 Comprehensive plan.

Over the next few months it was uncertain which documents, the Draft NIH Master Plan 2003 Update and EIS, or the Final Comprehensive Plan would be published first. If it was the former, the 0.50 ratio would still apply. If the latter, it was uncertain whether NCPC would revise the goal in response to NIH review comment or not, and if the ratio was different than 0.50, how NIH would account for any change in the parking ratio goal in its documents.

The final version of the Comprehensive Plan was published in August, 2004. It kept the 0.33 ratio goal. At this point in time, the NIH documents were in the final typing, editing, proofing, and internal review stages of development prior to publication. The decision was made by NIH to publish the documents, which were based on the 0.50 ratio and consistent with one another. The situation involving the new parking ratio goal would be resolved during the NEPA public and NCPC review process.

NIH still believes the 0.33 employee parking ratio goal is too low. As a result of discussions between NIH and NCPC during the review process, NIH will prepare a revised TMP during the next year that will determine an appropriate partial ratio goal.

Mr. Ron Wilson
Page Two

The proposed master plan should anticipate adhering to the Comprehensive Plan goals, modified in August 2004, and which would apply to the NIH campus. Consequently, the EIS should be revised to acknowledge the new employee parking ratio goal applicable to the Main Bethesda Campus that is established at one space per three employees versus the current cited one space per two employees. The importance of this revision should not be overlooked by focusing only on the referenced Memorandum of Agreement mentioned by the text authors. As important as the 1995 baseline vehicle count is to the management of traffic, the staff believes continual reference to traffic volume numbers alone does not address the issue of all significant impacts from the NIH facility. There is a dilemma with regard to traffic volume in the vicinity of NIH, when over sixty percent of the NIH volume remains single-occupant vehicles within a time period that the Montgomery/Rockville area, including the Rockville Pike corridor, faces an increase in area households and resulting traffic that is projected to move upward by over 40 percent and a "vehicle miles traveled" growth rate of between 0.8 to 0.95 percent per year for local streets. (see attached Metropolitan Washington Council of Governments (COG) Round 6.4A Cooperative Forecast of households for the Draft Air Quality Conformity Assessment, 2004 Update of the Constrained Long Range Plan (CLRP) FY2005-2010).

(2)

The staff is cognizant of the commendable NIH efforts over many years to maintain a Transportation Management Plan component to all planning anticipated at the Bethesda Campus. This is fully demonstrated in the EIS and the NCPC applauds all these NIH efforts and successes, including continual compliance with the 1995 MOA. Nevertheless, the Commission staff at this time requests the NIH fully review in the EIS the potential for telecommuting of the NIH employees at the main Bethesda Campus to affect possible improvement in the NIH employee parking ratio for the master plan. The master plan itself touches upon the general scope of the viability of telecommuting but a more thorough evaluation in the EIS is necessary.

(3)

Currently within the EIS summary matrix a mitigation action is specified at page 1-9 with telecommuting and alternate work schedules as a "may include" option, but is not fully explained or effectively examined within the EIS itself in Section 5.3.12. Furthermore, COG analysis demonstrates telecommuting has a reasonable potential to impact air quality conformance of the Washington region with minimal costs. COG estimates a cost effectiveness of \$8,000 to \$15,000 per ton of pollutant reduction for telecommuting initiatives while benefiting a regional reduction of 0.27 or more tons/per day. This makes telecommuting one of the most cost effective measures for employers to implement on a per ton basis, versus other control measures.

(2) The primary means in managing regional transportation congestion and air quality is controlling vehicle trip generation. Montgomery County uses this approach in managing and mitigating traffic generated by new development projects. A restriction on parking is one tool in managing vehicle trip generation.

(3) The potential for telecommuting at the Bethesda campus will be evaluated in the revised TMP. However, on a preliminary basis, the potential is estimated to be low. Many of the NIH administrative functions are located in, or have been relocated to, leased facilities elsewhere in Montgomery County. About 6,000 employees work in the Clinical Center complex performing hospital and research functions, and their work functions require campus presence. Researchers must be present at the laboratory bench or for patient clinical trial appointments. Most of the support personnel, such as animal care, waste collection and treatment, police, safety, and utility operations must be on the campus on a regular basis to perform their jobs.

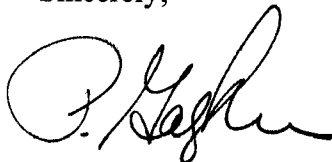
Mr. Ron Wilson
Page Three

Continuing with other issues, NCPC staff stresses that the substantial removal of vegetation in any proposed master plan would not be supported by the Comprehensive Plan objectives of the new policies of the Commission. We strongly request a re-assessment of land areas to be directed toward specific mitigation efforts in the EIS summary and relate unambiguous mitigation under the guidance of a prepared forest or tree conservation plan, which has been promised by NIH for at least the last four years. Most importantly, this detailed mitigation should assist in replacing the anticipated 500 trees that may potentially be lost implementing the master plan. (4)

Finally, NCPC staff wishes to correct the record identified at Section 6.1.2 regarding the master plan update, its EIS process, and preliminary comments during early coordination. NCPC reviewed and provided a significant number of review comments in January 2003 to you via e-mail regarding the draft master plan text provided to NCPC and titled as the 2002 Campus Master Plan and Supplemental EIS. The staff is satisfied all its issues have been addressed by the 2003 document except for the expressed concerns about historic and cultural resources. While we appreciate that NIH has improved much information as recommended by NCPC for some resource issues, our concern is more deeply established that NIH is not maintaining a commitment to affirmatively respond to the Commission's request to better manage its historic and cultural resources at the Bethesda Campus. NCPC continues to believe the most appropriate course is the development of a Programmatic Agreement for this campus. (5)

Your consideration of our comments at this stage of the master planning and its environmental review is most timely and I look forward to examining the master plan further in the upcoming January 6, 2005 Commission meeting. Please place the Commission on the distribution list pertaining to all further environmental considerations of the Plan. If you have technical questions concerning the information related in this letter, you may contact Mr. Eugene Keller, in the Office of Urban Design and Plans Review, at (202) 482-7251.

Sincerely,



Patricia E. Gallagher, AICP
Executive Director

Attachment (1)

(4) See new text in Section 5.9.3 and Table 1-2. NIH is in the process of preparing a campuswide Urban Tree Conservation Plan.

Tree losses associated with individual development projects are unavoidable because of their extent on the campus, i.e. more than 3,500. Minimization of losses will be accounted for in the individual project conservation and preservation plans that undergo State review. The project plans will be prepared under the guidance of the campuswide Urban Forest Stand Delineation and Conservation Plan.

A significant portion of a campuswide Tree Conservation Plan includes nearly all the information in Sections 5.8 and 5.9 of this EIS. Publication of the Draft Master Plan Update and EIS were originally scheduled for October, 2001. It was the intent of NIH to use these sections, as modified by public and government agency comment in the plan. The events of September 11, 2001, resulted in a change in planning premises and delay in publication of the draft documents, and consequently, delay in finalizing a draft campuswide conservation plan.

(5) The preliminary drafts sent to NCPC were "courtesy copies, and not part of the formal NEPA process or record. Many of the Commission staff comments made in January 2003 were incorporated into the Draft EIS published in September 2004. NIH will continue coordination with the Maryland Historical Trust (MHT), the jurisdictional review agency, on historic preservation issues. See the next comment letter, which was from MHT.

ATTACHMENT 1

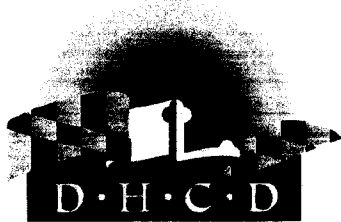
09/29/04

**Summary of Intermediate Household Forecasts
Round 6.4A Cooperative Forecasts
(Thousands)**

JURISDICTION	1990	1995	2000	2005	2010	2015	2020	2025	2030	2000 to 2030		Regional Share
										Number	% Change	
District of Columbia (1)	249.6	232.1	248.3	263.9	272.1	292.7	298.2	303.7	303.7	55.4	22.3%	8.3%
Arlington County	78.3	86.9	86.9	92.9	99.6	103.9	111.5	114.6	116.7	29.8	34.2%	4.4%
City of Alexandria	33.3	56.4	61.9	66.2	70.0	71.8	73.0	74.3	75.3	13.4	21.7%	2.0%
Central Jurisdictions:	381.4	375.4	397.1	423.1	441.8	470.4	482.7	492.6	495.7	98.6	24.8%	14.7%
Montgomery County (2)	282.0	301.8	324.6	347.0	370.0	390.0	403.0	413.0	420.0	95.4	29.4%	14.3%
Rockville (3)	15.7	16.1	17.2	21.1	23.9	24.1	24.2	24.3	24.4	7.2	41.9%	1.1%
Prince George's County	238.0	278.1	288.6	304.5	319.0	333.6	346.7	359.6	369.8	81.2	28.2%	12.1%
Fairfax County	292.3	317.0	350.7	381.8	408.7	421.8	430.5	433.0	438.4	87.7	25.0%	13.1%
City of Fairfax (4)	7.4	7.7	8.0	8.6	8.9	9.0	9.1	9.2	9.3	1.3	16.3%	0.2%
City of Falls Church	4.2	4.4	4.3	4.6	4.9	5.1	5.2	5.3	5.4	0.9	20.0%	0.1%
Inner Suburbs	843.9	909.0	976.3	1,046.5	1,111.5	1,159.5	1,196.5	1,234.1	1,242.9	266.6	27.3%	39.8%

- (1) The Round 6.4 population and household forecasts for the District of Columbia reflect Census 2000 counts which showed the city's population to be higher than estimated in previous forecast rounds.
- (2) Forecasts for years 2000 to 2030 include all of Takoma Park.
- (3) Included in Montgomery County total
- (4) Forecasts for all years do not include Fairfax County households (+/- 500 households) in TAZ 1609

Source of data table is: Memorandum, *Draft Air Quality Conformity Assessment for the 2004 Update of the Constrained Long Range Plan (CLRP) and the FY2005-2010 Transportation Improvement Program (TIP)*, dated October 1, 2004



MARYLAND DEPARTMENT OF HOUSING
& COMMUNITY DEVELOPMENT

Robert L. Ehrlich, Jr.
Governor
Michael S. Steele
Lt. Governor
Victor L. Hoskins
Secretary
Shawn S. Karimian
Deputy Secretary

November 19, 2004

Linda C. Janey
Director, Maryland State Clearinghouse
Maryland Department of Planning
301 West Preston Street
Room 1104
Baltimore, MD 21201-2305

Re: Draft Environmental Impact Statement and Master Plan 2003 Update for National Institutes of Health,
Main Campus, Montgomery County – MD20041006-1139

Dear Ms. Janey:

In response to a request from MDP and the National Institutes of Health, the Maryland Historical Trust (MHT) has reviewed the above-referenced documents with respect to effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and Article 83B, Sections 5-617 and 5-618 of the Annotated Code of Maryland. We understand that the proposed Master Plan 2003 Update of the 1995 Bethesda campus master plan is intended to guide and coordinate physical development of the NIH Bethesda campus in terms of buildings, utilities, roads, landscapes, and amenities over the next twenty years in response to projected NIH needs.

As noted in both the draft Master Plan and the associated EIS, a number of the undertakings that will presumably be generated by the plan may have the potential to impact areas that are known to be archeologically sensitive and/or buildings that are eligible for listing in the National Register of Historic Places. It is, of course, also possible that some of the proposed project areas may have the potential of containing significant historic properties that have not yet been identified. For these reasons, MHT would like to request that NIH continue to coordinate with us as planning for each of the proposed undertakings proceeds. We appreciate the conscientious efforts that have already been made by NIH to consider the potential effects on historic properties throughout the master planning process, and we look forward to continued consultation as project planning moves forward. (1)

If you have any questions or require further information, please do not hesitate to contact either Jonathan Sager (for historic built environment) at 410-514-7636 or Dixie Henry (for archeology) at 410-514-7638. Thank you for providing us with this opportunity to comment.

Sincerely,

Dixie L. Henry
Preservation Officer
Project Review and Compliance

DLH/200403297

cc: Bob Rosenbush (MDP)
Ron Wilson (NIH)
Leonard Taylor, Jr. (NIH)



- (1) NIH will continue to coordinate with MHT on NIH planning and project issues involving the National Historic Preservation Act



MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard o Baltimore Maryland 21230-1718
(410) 537-4120

Robert L. Ehrlich, Jr.
Governor

Kend P. Philbrick
Secretary

Michael S. Steele
Lt. Governor

Jonas A. Jacobson
Deputy Secretary

December 16, 2004

Mr. Ron Wilson
National Institutes of Health
Division of Facilities Planning, ORF
31 Center Drive, Room 3B44, MSC 2162
Bethesda MD 20892

RE: MDE Identification Number: ES20041101-0034
Project: Master Plan 2003 Update

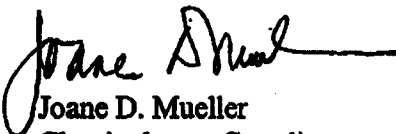
Dear Mr. Wilson:

Thank you for the opportunity to review the above referenced project. The document was circulated throughout the Maryland Department of the Environment (MDE) for review, and the following comments are offered for your consideration.

1. Any above ground or underground petroleum storage tanks that may be utilized must be installed and maintained in accordance with applicable State and federal laws and regulations. Contact the Oil Control Program at (410) 537-3442 for additional information. (1)
2. Underground storage tanks must be registered and the installation or removal must be conducted and performed by a contractor certified to install underground storage tanks by the Waste Management Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.

Again, thank you for giving MDE the opportunity to review this project. If you have any questions, please feel free to call me at (410) 537-4120.

Sincerely,


Joane D. Mueller
Clearinghouse Coordinator

- (1) All NIH Bethesda campus underground storage tanks were brought into conformance with federal and State laws and regulations in the early 1990s.



Washington Area Bicyclist Association

GETTING THERE BY BIKE

November 5, 2004

Ron Wilson
Division of Facilities Planning
Office of Research Facilities Development and Operations
National Institutes of Health
31 Center Drive, Room 3B44, MSC 2162
Bethesda, MD 20892-2162
Telephone (301) 496-5037
Fax (301) 402-0017

Subject: Comments of the Washington Area Bicyclist Association on the National Institutes of Health Master Plan 2003 Update

Dear Mr. Wilson:

The following are the comments of the Washington Area Bicyclist Association on the National Institutes of Health Master Plan 2003 Update. WABA is a local non-profit safety and education organization dedicated to improving the health and well being of the Washington region through the promotion of safe bicycling for transportation and recreation. We currently represent over 7,000 area cyclists.

According to the NIH Almanac, the mission of the NIH is "science in pursuit of fundamental knowledge about the nature and behavior of living systems and the application of that knowledge to extend healthy life and reduce the burdens of illness and disability." If NIH intends to provide leadership to improve the health of the nation, NIH must lead by example. The employees of the NIH take this responsibility to heart. The NIH has a very large and very active bicycle user group that boasts over 110 members and is an example for other agencies and businesses to follow. It is currently working on a NIH Bikeways Master Plan that will be completed by the summer of 2005. The recommendations of this plan should be adopted and incorporated into the update of the Master Plan 2003 Update.

The need for daily moderate exercise from activities such as brisk walking or bicycling is one scientific finding that NIH wants every American to understand, yet encouraging bicycle and pedestrian access to the campus is conspicuously absent from the goals of the study. The current lack of adequate hiker-biker paths along busy and dangerous roads adjacent to the campus acts as a deterrent to non-motorized travel. This in turn discourages physical activity thereby promoting poor citizen health through inactivity. While the NIH has done much in the past to create facilities for biking and walking, he

(1)

- (1) The observation is noted. Many of the sidewalks in the residential areas around the campus have a reduced width, and some areas lack sidewalks altogether.

current facilities are substandard and need to be improved. The Master Plan Update is a terrific opportunity to fix these facilities and demonstrate its commitment to healthier lifestyles.

The location of the NIH main campus offers an opportunity to provide an important bicycle and pedestrian extensions from the end of the North Bethesda Trolley Trail toward the Capital Crescent and Georgetown Branch Trails in Bethesda, as well as to the campus itself. On the western side of the campus, the current sidewalk along Old Georgetown Road is substandard and does not conform to bicycle facility design guidelines set forth by the American Association of State Highway Transportation Officials (AASHTO). All efforts should be made to extend the Trolley Trail along the western edge of the campus, providing proper warning signage and crosswalk striping at

(2)

the areas where the trail crosses campus entrances and exits. On the southwestern side of the campus the NIH trail is also substandard and should, and as with the Trolley Trail extension, should be upgraded to modern AASHTO design standards. The new trails should also be signed with directional information pointing towards the Trolley Trail as well as potential connections to the Capital Crescent Trail and the Montgomery County bike route network.

(3)

WABA also recommends that intersections at the campus entrances and exits be redesigned to improve safety and mobility for the high level of bicycle and pedestrian traffic that comes to the campus. Of particular concern is the intersection at Rockville Pike and Cedar Lane which has been designed to facilitate a higher rate of speed for autos as they turn right from Cedar onto southbound Rockville Pike.

(4)

Thank you for this opportunity to comment. Please feel free to call if you have any questions.

Sincerely,



Eric Gilliland
Executive Director

(2) All the sidewalks and streets along the west, north, and east edges of the campus are in public space, and either owned by the Maryland State Highway Administration (MSHA) or Montgomery County. Any upgrading of the sidewalks to bicycle trail criteria in public space would be their responsibility.

(3) With the exception of access at a future Visitor Center on Rockville Pike, it was expected that Bethesda campus pedestrian access would be limited to NIH employees only when the path along the southern campus edge was built. The purpose of the paved path was to provide a paved route for non-NIH pedestrians outside the security fence around the southern campus perimeter. It was not intended or designed as a formal bicycle trail.

(4) The intersection is owned by, and under the jurisdiction of, the Maryland State Highway Administration. NIH has no jurisdiction beyond its property line.

Wilson, Ronald (NIH/OD/ORF)

From: Jack Cochrane [gecko@radix.net]
Sent: Tuesday, November 30, 2004 12:29 AM
To: Wilson, Ronald (NIH/OD/ORF)
Subject: Master Plan DEIS Testimony

November 25, 2004

Montgomery Bicycle Advocates (MOBIKE)
Jack Cochrane, Chair
7121 Thomas Branch Dr.
Bethesda, Maryland 20817

National Institutes of Health
c/o Ron Wilson
9000 Rockville Pike
Bethesda, Maryland 20892

Please accept this written testimony on behalf of Montgomery Bicycle Advocates (MOBIKE) concerning the Draft Environmental Impact Statement to the NIH Master Plan. I also testified in person on behalf of MOBIKE at your November 8, 2004 public meeting on the same topic. MOBIKE is an organization dedicated to supporting the needs of bicyclists in

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Montgomery County.

We would ask NIH to support certain key improvements to the hiker-biker trail network located in and around its campus. As a major employer in a congested part of the county, NIH shares responsibility for working towards minimizing automobile traffic and encouraging alternative modes of transportation, especially healthy, clean modes like bicycling. Certainly bicycling is a good fit with NIH's mission to promote public health.

Already a number of NIH employees get to work by bicycle, and many more people commute by bike to downtown Bethesda and points south using the paths and sidewalks along the NIH periphery. NIH is in a unique position to help (or hurt) bicycling by virtue of the influence it has on the design and alignment of these periphery routes. We hope that NIH will do the right thing and lend its support to making necessary improvements to the routes.

The most important bikeway next to NIH is the partially completed Bethesda Trolley Trail or BTT (also known as the North Bethesda Trail). This a major new facility that runs from the White Flint Metro station to Lincoln Street behind NIH. At Lincoln Street the BTT connects to the so-called NIH Trail, an important facility that runs along the southwest border of the NIH property. The NIH Trail in turn connects to a path leading across Battery Lane to Norfolk Ave. The three trails together can be thought of as a single north-south hiker-biker trail. The combined trail promises to be a tremendously useful bike route by virtue of its bridges across I-270 and I-495, its length, and the destinations it connects.

But there are problems with the combined trail in its current form. We appreciate that

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NIH funded and built the NIH Trail on its property, but this path is much too narrow to carry the anticipated volume and mix of bike and pedestrian traffic. Such a trail should be 10' wide, not 5', to permit two-way cycling and to allow cyclists to safely pass pedestrians. The current width will lead to conflicts and crowding as significant number of cyclists start using it after the BTT is complete. In effect NIH only built half a trail, and we urge the agency to widen it. We also ask NIH to install signs identifying where the intersecting side trails lead. Once the trail is widened, NIH should also paint a center line and put up "keep right" signs. (1)

Second, the BTT along most of Old Georgetown Road is nothing more than a narrow sidewalk located perilously close to the roadway. Montgomery County DPWT plans to replace the sidewalk with a wider, improved trail along this section, but the cost will be high, the county is likely to delay this effort for some time. We would like NIH to fund construction of the BTT trail in front of its own property, from Cedar Lane to Lincoln Street. This would allow and encourage the county to finish the rest of the trail sooner. (2)

We also urge NIH to aid in construction of the planned shared-use path along the south side of Cedar Lane, abutting the NIH campus, between Old Georgetown Road and Rockville Pike. This path will connect to the existing path along Cedar Lane east of Rockville Pike, which connects to Rock Creek Park.

Thank you very much for considering our input.

Sincerely,

Ronald E. Wilson
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Jack Cochrane
Chair, Montgomery Bicycle Advocates (MOBIKE)

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(1) See response 3 in previous letter.

(2) See response 2 in previous letter.

Statement by Jerome Collins, 5603 Lincoln St. Bethesda MD 20817 301 897-0828
8 November 2004

NIH EXPANSION

When a community's quality of life is likely to be affected by a major project such as NIH's expansion, it is reasonable to expect the relevant parties to resolve possible issues of contention. To accomplish this mutually beneficial objective, detailed factual information needs to be made available to the public as early as possible,

Relevant items could include, for example, information on NIH's:

present rates of consumption for electricity, fuels, and water

(1)

capacities of the present utility connections (power lines, fuel storage, water and sewer)

a schedule of planned or expected increases in the demands for these services.

These items to be updated periodically, as a minimum, annually.

If not yet in NIH's Master Plan, this kind of information should be included.

For NIH to not provide the best information possible could be regarded by affected communities as calculated non-cooperation.

(1) See all of Section 5.4 of the EIS for information on current and future utility demands including steam, chilled water, electricity, fuels, water and sanitary sewer systems as well as the capacities of campus systems. The need for campus capacity improvements, e.g., Boiler 7, additional chillers, changes in the electric power distribution system are identified and discussed.

Copies of the Draft EIS were sent to each of the public utilities serving the campus (PEPCO, Washington Gas, WSSG) for review and comment. No specific comment was received, but the projected NIH Bethesda demands are expected to be within the capacity of the public utility systems. Correspondence sent by WSSC reviewing the 1995 NIH Bethesda Master Plan and EIS indicated WSSC had sufficient water and sanitary system capacity to handle projected growth in campus demands or usage. The 2003 Update projected campus usage is about the same value.

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