

DEPARTMENT OF DEFENSE

Department of the Navy

Record of Decision for the Medical Facilities Development and University Expansion at Naval Support Activity Bethesda, Bethesda, Maryland

AGENCY: Department of the Navy, Department of Defense (DoD).

ACTION: Record of Decision

SUMMARY: The United States Department of the Navy (DON), after carefully weighing the environmental consequences of the proposed actions, announces its decision to construct and operate the Medical Facilities Development (MFD) at Naval Support Activity (NSA) Bethesda, Bethesda, Maryland. DON also announces its decision to construct and operate the expansion of the Uniformed Services University of the Health Sciences (USU or the University Expansion) at NSA Bethesda. The Navy has decided to implement the preferred alternatives for the MFD and University Expansion, as described in the MFD and University Expansion Final Environmental Impact Statement (EIS) dated July 2013. The preferred alternatives are also the Environmentally Preferable Alternatives. The preferred alternative for the MFD will fully meet the Congressional mandate in the Fiscal Year (FY) 2010 National Defense Authorization Act (NDAA) to achieve the new statutory world-class standards for military medicine at the Walter Reed National Military Medical Center (WRNMMC) by providing enduring medical facilities commensurate in quality, capability and condition as those provided by the 2005 Base Realignment and Closure (BRAC) investment. The preferred alternative for the University Expansion will provide adequate education and research space to meet Military Health System (MHS) commitments to deliver training and post-graduate level education to the military medical community and enable USU to serve as the core academic health research center at WRNMMC. The proposed actions will enhance and support but not add to the missions of the installation, medical center, or the USU. NSA Bethesda is the action proponent and Joint Task Force National Capital Region Medical (JTF CapMed), WRNMMC, and USU are tenants of NSA Bethesda.

The MFD includes the following components and will add approximately 50 staff to the installation:

- 1) Demolition of five hospital buildings (Buildings 2, 4, 6, 7, and 8) and construction of a single replacement facility in the same general footprint (Medical Center Addition and Alterations-MCAA or Building C);
- 2) Construction of a 500-space parking garage structure at H-Lot, which will accommodate staff transferring from the hospital core parking structures to open up 500 additional spaces for patients, visitors, and very important persons (VIPs);
- 3) Utility capacity upgrades;
- 4) Construction of temporary medical facilities to maintain uninterrupted patient care during construction and renovation;

- 5) Internal renovations of five hospital buildings (Buildings 1, 3, 5, 9, and 10); and
- 6) Accessibility and appearance improvement projects:
 - a. North Palmer Road – This project focuses on the areas immediately around Buildings 11, 60, 61, and 62, north of North Palmer Road. It also includes areas adjacent to Building 1.
 - b. Courtyard – This project will add a variety of plantings for color, texture improvements, and green screens along the exterior walls to enhance the area adjacent to Building 9.
 - c. Memorial Grove – This project will address the severe grade transition from South Palmer Road to East Palmer Road. This area is critical for continued accessibility to the Fisher Houses, Navy Lodge, and Bowling Center because the existing sidewalks associated with the bridges along South Palmer Road are not considered accessible.
 - d. Building 17 Connector – This project will provide a pedestrian pathway to the Fitness Center, JTF CapMed, Flag Officer Quarters, and the future Sanctuary Hall and United Service Organizations (USO) facilities.
 - e. University Entry – This project will provide additional flowering azaleas along the section of University Road near the pond to improve the appearance of this area.
 - f. Stoney Creek Trail System – This project will provide a fully accessible, six-foot wide, asphalt trail that never slopes more than five percent and will generally follow the footprint of the existing trail, limiting the amount of associated tree clearing. This project will include one existing and one new bridge over Stoney Creek

The University Expansion will include the following components and will consolidate 220 staff (these staff are current USU personnel that already travel in the region, including regular visits to campus) to NSA Bethesda:

- 1) Construction of an approximately 341,100 square-foot (SF) education and research facility (Building F) and a 400-space staff parking garage, located west of the existing USU campus and in the area between USU and the Armed Forces Radiobiology Research Institute (AFRRI); and
- 2) Internal renovations to existing USU buildings.

Three areas at NSA Bethesda have been identified as potential locations for temporary construction staging. Construction material will be stored within the staging areas to the extent practicable. MFD will require an estimated 5-year construction period and the University Expansion an estimated 2-year construction period.

The Final EIS considered the 2013 NSA Bethesda Master Plan relative to the implementation of the MFD and University Expansion. The Final EIS evaluated the direct, indirect, and cumulative impacts of the proposed actions in the context of the programmed projects already in progress and the programmatic effects of the potential future development opportunities identified in the 2013 NSA Bethesda Master Plan.

In the Final EIS, the Navy evaluated the potential environmental impacts associated with the MFD and MFD parking garage alternatives and University Expansion alternatives within the following environmental resource areas: geology, topography, and soils; surface water and groundwater; floodplains; wetlands; vegetation; wildlife; aquatic and wetland habitat; threatened and endangered species; air quality; noise; utilities and infrastructure; transportation and traffic; cultural resources; land use and aesthetics; socioeconomics and environmental justice; and human health and safety. Methods to avoid, reduce or minimize impacts to affected resources were addressed in the Final EIS.

The MFD and MFD parking garage action alternatives will result in similar types of environmental impacts, although the magnitude of these impacts will vary among the alternatives. The principal types of impacts during the demolition and construction periods will include removal of landscaped vegetation, excavation and construction area runoff, and demolition and construction related noise and air pollutant emissions, including from truck trips for transporting construction/demolition material. Air quality, utilities, traffic, and human health and safety will be anticipated to incur additional impacts during operations beyond those during the construction period. The new Building C will be attached to the rear or east of the Central Tower Block (Building 1), a National Register of Historic Places (NRHP) listed resource, and will be engaged with Buildings 3 and 5 which are NRHP eligible resources.

The Navy and the Maryland Historical Trust (MHT) acting as the Maryland State Historic Preservation Office (SHPO) have executed a Programmatic Agreement (PA), under which the Navy will ensure that avoidance of adverse effects to any previously identified historic properties is the preferred treatment and will utilize all feasible, prudent and practical measures to avoid, minimize or mitigate adverse effects. In the long term, impacts from the operation of the MFD will include an increase of up to 1.25 acres of impervious surface at NSA Bethesda, generate between 14 and 17 staff trips during the morning peak hour and between 14 and 16 staff trips during the afternoon peak hour, and increase NSA Bethesda's demand for power, telecommunications, and natural gas. Demolition of Buildings 2, 4, 6, 7, and 8 and construction of Building C are not expected to significantly change the demand for sewer service. Although Building C is larger than the combined area of the buildings it replaces, it is not expected to have increased potable water demand and wastewater flows due to the water conservation measures planned for the new Leadership in Energy and Environmental Design (LEED®) Silver designed building.

The implementation of the preferred alternative for the MFD will not have significant impacts any of the resources analyzed in the EIS; therefore, the proposed action will not contribute significantly to cumulative impacts.

The University Expansion action alternatives will result in similar types of environmental impacts, although the magnitude of these impacts will vary among the alternatives. The principal types of impacts during the construction periods will include removal of landscaped vegetation/scattered trees, construction area runoff, and demolition and construction-related noise and air pollutant emissions, including from truck trips for transporting construction/demolition material. Air quality, utilities, traffic, and human

health and safety issues will be anticipated to incur additional impacts beyond those during the construction period and during operations. In the long term, impacts from the operation of the University Expansion will include an increase of 1.6 acres of impervious surface at NSA Bethesda. In the long term, operation of the University Expansion will generate between 135 and 161 new staff trips during the morning peak hour and between 163 and 193 new staff trips during the afternoon peak hour and increase USU's demand for power, telecommunications, potable water, wastewater disposal, and natural gas.

The implementation of the preferred alternative for the University Expansion will not have significant impacts to any of the resources analyzed in the EIS; therefore, the proposed action will not contribute significantly to cumulative impacts on any of the resources.

The Navy ensured that Federal agencies, state agencies, local entities, non-governmental organizations, and members of the public had the opportunity to provide comments during the public scoping period, the Draft EIS public comment period, and the Final EIS wait period. Throughout the EIS process, the public was provided the opportunity to obtain information on the status and progress of the proposed actions and the EIS through the NSA Bethesda Public Affairs Office. The Navy initiated early coordination with the various Federal, state, and local agencies. For the EIS traffic study, the Navy initiated early coordination with the Maryland National Capital Park and Planning Commission (M-NCPPC), Maryland State Highway Administration (MSHA), and Montgomery County Department of Transportation (MCDOT) to ensure that the agencies were in agreement with the methodology used in the traffic study. The Navy also initiated and engaged in early and frequent coordination with the MHT, the National Capital Planning Commission (NCPC), and the Advisory Council on Historic Preservation (ACHP) for the various projects in the EIS as "undertakings" with the potential to affect historic properties under the National Historic Preservation Act (NHPA). The Navy also coordinated with the U.S. Fish and Wildlife Service (USFWS) and the Maryland Department of Natural Resources (MDNR) regarding endangered or threatened species that have the potential to occur at NSA Bethesda.

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SUPPLEMENTARY INFORMATION: Pursuant to Section 102(2)(c) of the National Environmental Policy Act (NEPA) of 1969, 42 U.S.C. Section 4332 (2)(c), the regulations of the Council on Environmental Quality (CEQ) for Implementing the Procedural Provisions of NEPA (Title 40 Code of Federal Regulations (CFR) parts 1500–1508) and the DON NEPA regulation (32 CFR part 775), the DON announces its decision to implement the MFD and University Expansion at NSA Bethesda, Bethesda, Maryland.

BACKGROUND AND ISSUES: NSA Bethesda is a Navy-owned, 243-acre military health care, medical education and research installation located in Bethesda, Maryland. NSA Bethesda is now the home of WRNMMC, after the 2005 BRAC mandated

relocation of the tertiary medical services from Walter Reed Army Medical Center (WRAMC), Washington, DC. WRNMMC is the new name of the former National Naval Medical Center (NNMC) and is the premier DoD medical center offering intensive and complex specialty and subspecialty medical services for the most seriously injured personnel from all military services, and serves as the major medical referral center for the DoD. The purpose of, and need for, the MFD were identified subsequent to the programming for BRAC 2005. The 2009 NDAA required an independent review to determine whether plans for WRNMMC and Fort Belvoir Community Hospital would provide world-class medical facilities. Defense Health Board (DHB) conducted the review, which identified that several areas where the plans for WRNMMC facilities did not meet this standard and provided recommendations to address those areas. The 2010 NDAA codified the DHB's operational definition for a "world-class medical facility" and required the Secretary of Defense to "develop and implement a comprehensive master plan (CMP) to provide sufficient world-class military medical facilities and an integrated system of healthcare delivery for the National Capital Region (NCR)." The law specifically required the CMP to include a program to address facility requirements as identified by a facilities needs assessment. It also required the CMP to incorporate "all ancillary and support facilities at the National Naval Medical Center, Bethesda, Maryland, including education and research facilities as well as centers of excellence, transportation, and parking structures required to provide a full range of adequate care and services for members of the Armed Forces and their families." In April 2010, the Deputy Secretary of Defense provided Congress with the required CMP and a Supplement to the CMP in August 2010. Among other items, the CMP identified post-BRAC facility projects required at NSA Bethesda to achieve "world-class" facility standards. A WRNMMC Medical Facilities Master Plan was developed to further refine the facility projects discussed in the CMP and to ensure they fully met the intent of the law.

The BRAC 2005 construction was specifically designed to accommodate the transfer of WRAMC to WRNMMC and restricted BRAC funding to projects accommodating the WRAMC relocation. Therefore, parts of the medical center did not undergo renovation or improvement during BRAC construction because that program was never intended to address the mission capability or functionality of the existing infrastructure. The CMP development process identified MFD as the best approach to meet the Congressional mandate for world class facilities commensurate in quality, capability, and condition with the BRAC investment.

NSA Bethesda is also the home of the USU, called the "West Point of Medicine," which provides the nation with health professionals dedicated to career service in the DoD and the United States Public Health Service. The institution is the nation's only fully accredited federal School of Medicine and School of Graduate Nursing. The University Expansion will directly support strategic alignment within the Military Health System by improving efficiency in teaching medical, nursing, and biomedical science students; producing research; and augmenting WRNMMC as a world-renowned biomedical research, education, and patient care facility.

The key environmental issue associated with the MFD is cultural resources because of the location of Building C, which will be attached to the rear or east of the Central Tower Block (Building 1) – a NRHP listed resource and will be engaged with Buildings 3 and 5, NRHP eligible resources. The Navy and the MHT (as the SHPO) have executed a PA, under which the Navy commits to ensuring that avoidance of adverse effects to any previously identified historic properties is the preferred treatment and will utilize all feasible, prudent, and practical measures to avoid, minimize or mitigate adverse effects.

For both MFD and University Expansion proposed actions, the public expressed concerns on the potential traffic increase in an already highly congested area. The Traffic Study conducted for the EIS shows that there will be no significant impacts on any of the intersections or arterials of external roadways when comparing the 2018 No Build condition to the 2018 Build Alternatives with the implementation of the MFD and the University Expansion (individually or cumulatively). Additionally, the staff parking ratio will continue to be in compliance with the NCPC-recommended ratio of one space for every three employees.

PURPOSE AND NEED:

MFD - The purpose of the MFD is to implement the Congressional mandate from the FY 2010 NDAA to achieve the new statutory world-class standards for military medicine at the WRNMMC by providing enduring medical facilities commensurate in quality, capability, and condition as those provided by the 2005 BRAC investment. The 2005 BRAC program was designed to accommodate transfer of WRAMC to WRNMMC but not address mission capability or improvements of the existing infrastructure. The MFD is needed because current space is insufficient to meet world-class standards.

UNIVERSITY EXPANSION - The purpose of the expansion of the USU is to provide adequate education and research space to meet MHS commitments to deliver training and post-graduate level education to the military medical community and to enable USU to serve as the core academic health research center at WRNMMC. The University Expansion is needed because current operations are dispersed between the main USU buildings and nineteen facilities comprising off-site leased locations in Montgomery County and other buildings on NSA Bethesda. Operations are fragmented and insufficient to meet education and research space requirements as well as Liaison Committee on Medical Education (LCME) accreditation requirements.

PUBLIC INVOLVEMENT: To ensure that the full range of issues related to the proposed actions were addressed, DON published a Notice of Intent (NOI) to prepare an EIS in the Federal Register on 19 August 2011 (76 Fed. Reg. 51957). The Federal Register publication initiated a 46-day public scoping period that began on 19 August 2011 and ended on 3 October 2011. DON also placed notices in local newspapers: The Washington Post (August 25, 26, and 27), The Washington Times (August 26, 29, and 30), and Montgomery County Gazette (August 29 – Gaithersburg, Bethesda, Potomac, and Rockville). Notices of the public scoping meetings were mailed to Federal, state, and local government entities and elected officials, local community associations, and members of the general public. The NOI was also posted on the project website:

<http://www.bethesda.med.navy.mil/nsa/eis.aspx>. DON held two public scoping meetings at the Pooks Hill Marriott in Bethesda, Maryland on 7 and 12 September 2011. Attendees included representatives of Federal, state, and local agencies, and the general public. DON received approximately 47 scoping comments and the majority of the comments from the local residents reflected concerns for the potential traffic increase in an already highly congested area. The DON considered all comments received during the scoping period in the preparation of the Draft EIS and formally responded to the comments in the Draft EIS.

On 14 September 2012, the U.S. Environmental Protection Agency (USEPA) published a Notice of Availability (NOA) of the Draft EIS in the Federal Register (77 Fed. Reg. 56840) and the DON published the Notice of Public Hearing (NOPH) in the Federal Register (77 Fed. Reg. 56817). The publication of the USEPA NOA initiated the 46-day public comment period that ended on 29 October 2012. DON extended the public comment period an additional week until 7 November 2012, to account for Hurricane Sandy. DON provided the extension notification to the public via an email from the Montgomery County BRAC coordinator. DON also placed notices of availability of the Draft EIS in local newspapers: The Washington Post (September 14, 15, and 16), The Washington Times (September 14, 17, and 18), and Montgomery County Gazette (September 19 – Gaithersburg, Bethesda, Potomac, and Rockville). The NOA and NOPH were mailed to Federal, state, and local government entities and elected officials, local community associations, and members of the general public.

DON held two public hearings on the Draft EIS on 4 and 11 October 2012 at the Pooks Hill Marriott, in Bethesda, Montgomery County, Maryland. Attendees included representatives of Federal, state, and local agencies, and the general public. DON received approximately 130 comments on the Draft EIS and the majority of the comments from the local residents reflected concerns for the potential traffic increase in an already highly congested area. DON reviewed all the comments on the Draft EIS and formally responded to them in the Final EIS.

The USEPA published the NOA of the Final EIS in the Federal Register (78 Fed. Reg. 43200) on 19 July 2013, which initiated a 32-day Wait Period that concluded on 19 August 2013. DON also placed notices of availability of the Final EIS in local newspapers: The Washington Post (July 19, 20, and 21), The Washington Times (September 19, 22, and 23), and Montgomery County Gazette (July 24 – Gaithersburg, Bethesda, Potomac, and Rockville). The Final EIS identified the DON's preferred alternatives for implementing the proposed actions; other alternatives considered by the DON; and the environmental impacts of the alternatives analyzed in detail. The Final EIS determined that implementing the preferred alternatives for the MFD and University Expansion will result in minimal impacts on most environmental resources and identified enhancement measures to reduce impacts on surface waters from soil erosion and runoff; for control of fugitive emissions to the air; for construction noise; and for traffic impacts. For cultural resources, DON will ensure that avoidance of adverse effects to any previously identified historic properties is the preferred treatment and will utilize all feasible, prudent and practical measures to avoid, minimize, or mitigate adverse effects. The Final EIS reflects public and agency comments on the Draft EIS, the Navy's

responses, and additional information received from reviewers. The Final EIS provides the decision maker with a comprehensive review of the potential environmental consequences of the preferred alternative and other alternatives.

ALTERNATIVES CONSIDERED - MFD: For the MFD, DON evaluated alternatives that will meet the purpose and need of the action. The MFD proposed action resulted from an iterative planning process from the CMP, which identified and evaluated alternatives based on the departmental needs anticipated at the WRNMMC after the completion of the BRAC-mandated relocations in September 2011. Selection criteria for the CMP were based on mandates from the DHB Study and the 2010 NDAA and were used to identify alternatives that were reasonable. Selection criteria included: 1) patient care; 2) teaching hospital; 3) physical plant; 4) cost factors; and 5) construction impacts.

The CMP development process identified the proposed action as the best approach to meet the Congressional mandate for world class facilities commensurate in quality, capability, and condition with the BRAC investment.

The Final EIS considered the No Action Alternative and the MFD including four alternative parking facility sites on NSA Bethesda, including three above-ground and one underground parking alternative. The three above-ground parking garage sites on the installation are: the Warehouse Area in the northeast corner, Taylor Road facilities in the northeast area, and H-Lot in the south area. The underground parking garage alternative site is west of Building 1 in the front lawn area.

Preferred Alternative - MFD. The preferred alternative for the MFD will implement the components as described above with the H-Lot above-ground parking garage as the preferred alternative. DON selected the H-Lot above-ground parking garage as the preferred parking garage alternative because it will have the least disruption to the installation operations during construction, will have the best level of constructability, is close to the medical core of the installation, and the alternative received a No Effect determination from the MHT. In the Draft EIS, DON identified the underground parking garage as its preferred alternative for the MFD; however, in the course of the NHPA Section 106 consultation, DON decided that the underground parking alternative could no longer be the preferred alternative because of the potential for adverse effects to Building 1 and its landscape setting.

No Action Alternative – MFD. The No Action Alternative is required by statute and evaluated the impacts at NSA Bethesda in the event that the MFD does not occur. Under this alternative, no demolition, construction, or renovation for the MFD will occur and staffing at NSA Bethesda will not change. The No Action Alternative does not meet the purpose and need as it will not provide WRNMMC with facilities that meet the new statutory, world-class standards for military medicine as mandated by the 2010 NDAA.

Environmentally Preferred Alternative - MFD. The H-Lot Parking Garage is also the environmentally preferred MFD parking garage action alternative.

ENVIRONMENTAL IMPACTS - MFD: The EIS evaluated the potential environmental effects associated with the MFD and the alternatives within the following environmental resource areas: geology, topography, and soils; surface water and groundwater; floodplains; wetlands; vegetation; wildlife; aquatic and wetland habitat; threatened and endangered species; air quality; noise; utilities and infrastructure; transportation and traffic; cultural resources; land use and aesthetics; socioeconomic and environmental justice; and human health and safety. Methods to avoid, reduce or minimize impacts to affected resources are addressed. The analysis included an evaluation of the direct, indirect, and cumulative impacts. This Record of Decision (ROD), however, focuses on the impacts and enhancement measures associated with the MFD preferred alternative.

Overall there will be no significant impacts to geology, topography, and soils. There will be a minimal increase in impervious surface area and minimal impacts to biological resources because new facilities will be constructed on existing developed or landscaped areas. The increase in storm water runoff resulting from the increase in impervious surface will be controlled with storm water management, including low impact development (LID) and erosion and sediment control measures. The Stoney Creek Trail System will have noticeable impacts to topography during construction-related grading, but no long term adverse impacts will occur.

There will be no significant impacts to floodplains. Impacts on aquatic and wetland habitats will primarily be during construction and those impacts will be minimized. Approximately 0.0212 acre of the Stoney Creek Trail Improvements will occur in the vicinity of potential wetlands. The final design layout and construction of the trail improvements in these areas will seek to avoid the potential wetland areas to the maximum extent possible. Should avoidance not be possible, Navy will conduct a wetland investigation and seek required permits.

Emissions of air pollutants from the proposed MFD during construction and operations will not exceed *de minimis* levels or ambient standards established by the USEPA for protection of the airshed and thus air quality impacts will not be significant. There will be no significant increase in greenhouse gases.

Short-term increases in noise levels that are typical of construction activities will occur during construction; for some components of the proposed action, depending on distance between sensitive receptors on NSA Bethesda and construction areas, noise reduction/minimization measures may be required.

Per DON's communication with the USFWS, except for occasional transient individuals, no Federally proposed or listed endangered or threatened species or critical habitat are known to exist within the project areas for the proposed action. Therefore, DON is not required to coordinate further with USFWS to satisfy Section 7 of the Endangered Species Act (ESA). Per DON's communication with the MDNR, the agency has determined that there are no state or Federal records of rare, threatened, or endangered species within the boundaries of the project sites.

A traffic study was conducted as part of the EIS to evaluate the impacts on traffic and transportation from the MFD and University Expansion; the complete Traffic Study is included in Appendix D of the Final EIS. The Traffic Study focused on the external intersections and arterials, internal intersections and gate counts, internal parking, and bicycle/pedestrian impacts. These systems together provide elements necessary for an overall evaluation of the potential impacts of the proposed actions on NSA Bethesda and nearby roadways and intersections.

To ensure the analysis complied with all state and county requirements, agreement was obtained from M-NCPPC, MSHA, and MCDOT on the study area, analysis methods, and future external roadway distribution of new NSA Bethesda trips. The analysis methods agreed upon for the external roadway signalized¹ intersections followed the Montgomery County and MSHA requirements. Another accepted traffic analysis method used for both signalized and unsignalized intersections² (Transportation Research Board Highway Capacity Manual) was used for the internal roadway network because these roadway intersections are all unsignalized. To provide additional traffic operation measurements beyond MSHA and Montgomery County requirements, this other accepted traffic analysis method was also used to evaluate the external roadways.

The intersections external to NSA Bethesda included in the traffic study were identified based on a preliminary site trip assignment through 17 intersections adjacent to the installation, in accordance with the M-NCPPC's Local Area Transportation Review methodology. The Navy considered expanding this list to include additional intersections identified by the public during the scoping period; however, M-NCPPC, MSHA, MCDOT, and Navy agreed that the additional intersections will not add new data to the analysis. Based on the site trip assignment and coordination with M-NCPPC, the original 17 intersections were determined to already sufficiently capture any effects generated by the proposed actions at the additional intersections requested; therefore, the additional intersections were not included.

Existing condition data and analysis of existing roadways (October-December 2011) provided the baseline for evaluation of the external and internal roadways serving NSA Bethesda. The Traffic Study presents a 2018 No Action (No Build) Alternative, which provides a future roadway operation base to compare the future 2018 Build Alternatives (the proposed actions). The 2018 No Build Alternative presents post-BRAC conditions as the baseline and includes assumptions that will directly affect the amount of traffic assigned to the external and internal roadway network. The general categories of the 2018 No Build assumptions that provided the Traffic Study framework are:

- External Roadway Improvements: Roadway improvements along the key roadways serving NSA Bethesda listed in the BRAC Mobility Projects

¹ An intersection that contains a traffic signal to guide vehicles through in a safe manner

² An intersection that contains stop signs to guide vehicles through in a safe manner

Matrix by the Montgomery County BRAC Implementation Committee (the committee is now known as Walter Reed BRAC Integration Committee).

- External Transit Improvements: Transit improvements that serve NSA Bethesda, helping to reduce the need to drive and park at the installation.
- Background Developments: Significant developments proposed in the vicinity of NSA Bethesda, as provided by the M-NCPPC.
- Gate Improvements: Intersection improvements separated from the external roadway improvement list serving the NSA Bethesda Gates #3 and #4 entrances. These improvements are complete. Improvements to Gates #1, #2, and #5 were previously completed and are part of the baseline assessment.
- Internal Roadway Improvements: Roadway improvements along internal installation roadways expected to be completed by 2018.
- Planned Projects: Planned projects at NSA Bethesda expected to be completed by 2018.
- Internal Installation Parking: Parking facilities expected to be operational in 2018.

The 2018 proposed actions (Build Alternatives) were developed based on the addition of new, or changes in existing, traffic patterns to access the proposed MFD and University Expansion projects.

The Traffic Study results showed that operation of the MFD will generate between 14 and 17 staff trips during the morning peak hour and between 14 and 16 staff trips during the afternoon peak hour spread between Rockville Pike and Jones Bridge Road depending on the gate of entry and exit. For the external roadways, there will be no significant impacts on any of the intersections or arterials when comparing the 2018 No Build condition (No Action Alternative) to the implementation of the MFD preferred alternative. With the H-Lot Parking Garage construction, the combined 500 parking spaces in Buildings 54 and 55 will be re-designated from employee use to patients, VIPs, and visitors use only. The 500 staff spaces that will be displaced from Buildings 54 and 55 will be accommodated by the H-Lot Parking Garage and another parking facility at the installation. Therefore, the construction of the preferred alternative will shift existing staff trips from existing parking facilities in the medical core to the H-Lot Parking Garage and another parking facility. Some of these moved or shifted staff trips will enter and exit the installation through different gates than presently used; however, no significant impact on installation roadways will occur when comparing the 2018 No Build condition (No Action Alternative) to the implementation of the MFD preferred alternative. Additionally, the staff parking ratio will continue to be in compliance with the NCPC ratio of one space for every three employees.

DON conducted formal consultation under Section 106 of the NHPA with the MHT, NCPC and ACHP and, with the MHT, executed a PA for the design and construction of the MCAA (Building C and interior renovations), which will guide a future consultation process as the design proceeds. Under the PA, DON will ensure that avoidance of adverse effects to any previously identified historic properties is the preferred treatment and will utilize all feasible, prudent, and practical measures to avoid, minimize or mitigate adverse effects. Per the PA, DON, in coordination with the SHPO, will ensure that those measures are incorporated into the design process for Building C.

The proposed utilities upgrades will provide the required support to the MFD. DON is coordinating with the utilities service providers to ensure that the proposed changes will not affect service delivery to the larger community.

The MFD is compatible with existing land use plans and land use planning underway within NSA Bethesda. Aesthetic impacts from construction activities will be temporary and cease upon their completion. Beneficial economic impacts to the surrounding economy from the investment in construction and renovations of facilities are anticipated, but will not have a significant impact on the local economy. There will be no disproportionately high or adverse impacts on minority, low-income populations, or children.

Adherence to applicable regulations and guidance will avoid impacts to human health and safety.

Cumulative Impacts – MFD: The implementation of the MFD is not anticipated to result in a significantly greater incremental impact when added to the actions of the other projects evaluated under cumulative impacts in the EIS, including the University Expansion.

The MFD is a component of the 2013 NSA Bethesda Master Plan that DON is updating. The 2013 NSA Bethesda Master Plan distinguishes the short-term planned/ongoing projects and long-term opportunity areas at the installation. Therefore, the EIS evaluated the cumulative impacts of the proposed actions in the context of the short-term planned/ongoing projects/recently and long-term opportunity areas at the installation. The EIS considered both construction and operation impacts in the context of the cumulative impacts discussion. For the long-term future development opportunities, the Navy will ensure the appropriate NEPA review is completed when the projects are proposed for implementation.

The short-term planned/ongoing projects as defined in the 2013 NSA Bethesda Master Plan include the projects of known scope that address specific plans, goals, or challenges in the near term. These short-term planned/ongoing projects are: Sanctuary Hall and Garage (Wounded Warrior Transition Lodge), Child Development Center (CDC), USO, Navy Lodge Expansion, Rockville Pike Crossing, Building 20 renovation, and Active Recreation Area Improvements. The Rockville Pike Crossing project will be constructed by Montgomery County and is included in the 2013 NSA Bethesda Master Plan for

coordination purposes only. The cumulative impacts analysis also considered one recently completed project, the Navy Exchange expansion, at NSA Bethesda.

The long-term opportunity areas include: Helipad Expansion, Building 13 Renovations, Warehouse Area Redevelopment; Kiss and Ride Facility; Buildings 54 and 55 (parking garages) Replacements; Building 50 (Mercy Hall) Redevelopment; Wounded Warrior Area Improvements; G-Lot Medical Expansion; Building 26 Anti-Terrorism/Force Protection (AT/FP) Renovation; Satellite Pharmacy Relocation; and Structured Parking Opportunities (Taylor Road Redevelopment, N-Lot Garage), and New Fire Station. The Kiss and Ride Facility project will be located outside the NSA Bethesda fence line and Montgomery County will be responsible for this project. It should be noted that the Taylor Road Facilities site is also analyzed in the EIS as alternative site for an above-ground parking structure. The N-Lot site is also analyzed in the EIS as Alternative 2 for the University Expansion. In addition, the EIS analyzed the cumulative impacts from the proposed actions when added to impacts from other Federal, state, and local initiatives, as appropriate. The cumulative impacts analysis also includes M-NCPPC approved off-base background development projects in the vicinity of NSA Bethesda during the time period of the proposed actions.

The proposed locations of the H-Lot parking garage and the Navy Lodge Expansion are adjacent to each other, and the construction timeframes will partially overlap. However, implementation of Best Management Practices (BMPs) will minimize soil erosion impacts and, although there will be construction overlap, it is anticipated that the initial construction phases of the H-Lot parking garage will occur after those of the Navy Lodge Expansion, thereby further minimizing the potential for cumulative soil erosion impacts. The increases in impervious surfaces from the MFD, when combined with the increase in impervious surfaces associated with these recently completed, ongoing, and planned actions, will result in increases in stormwater runoff. However, construction of recently completed and short-term planned/ongoing projects at NSA Bethesda have and will be conducted in accordance with all applicable regulatory requirements for erosion and sediment control and stormwater management, thereby greatly reducing their impacts. These projects will also incorporate LID and green infrastructure, including LEED® features, further reducing impacts on water resources.

The MFD will occur in currently developed areas and there will be minimal impacts on biological resources from those proposed actions and cumulative impacts on biological resources are not anticipated. The air quality analysis takes the overall health of the airshed into consideration and is conducted, per regulation, separately for each proposed project. MFD's emissions will be below stated *de minimis* levels or thresholds and cumulative air quality effects will not be significant and will not pose a significant incremental effect to any other actions within the airshed, including the short-term planned/ongoing projects occurring at NSA Bethesda, which will be required to be separately evaluated by applicability analyses.

Cumulative noise impacts were evaluated because the construction associated with the MFD as well as the short-term planned/ongoing projects will be conducted concurrently over a large area within the installation. However, the distance between projects,

intervening structures and topography, and noise attenuation measures applied to the proposed actions and the short-term planned/ongoing projects as appropriate, will result in minimal additive impacts on construction noise generated by any concurrent projects. Therefore, no cumulative adverse noise impacts will be expected.

The short-term planned/ongoing/recently completed projects, including those addressed in the EIS, will increase the overall utility demands for the installation. These projects are identified in the 2013 NSA Master Plan and have been included in prior Master Plan updates. Some of the short-term planned/ongoing projects include replacing outdated buildings with LEED® Silver designed energy efficient ones.

Local providers of electricity, water, and wastewater services indicated that the increased utility demands required to support NSA Bethesda's short-term planned/ongoing projects can be met. The Navy is coordinating with the service providers to ensure that these proposed changes will not affect service delivery to the larger community by verifying that the system can accommodate the additional load. Long-term projects and opportunities will further increase the installation's demands for utilities. Specific utility demands for these projects have not yet been developed. When these projects become more defined, DON will share the potential utility demands with local and regional suppliers so these demands can be incorporated along with other regional growth into the suppliers' long-term planning strategies.

Projected growth in the region was evaluated based upon the background development (proposed projects outside of NSA Bethesda), the approved future roadway projects, and short-term planned/ongoing projects as part of the 2018 No Build condition. As discussed, one completed project, the new Navy Exchange and parking garage, is also included in the No Build condition. Impacts for each of the 2018 Build Alternatives were assessed with the project growth and roadway improvements from the 2018 No Build condition, plus the addition of new trips generated by the MFD and University Expansion.

Each 2018 Build Alternative considered the addition of new trips generated by the MFD based on a maximum projected trip generation resulting from the proposed 50 new employees. The EIS evaluated the traffic impacts of truck traffic required to bring in construction materials and remove demolition or construction debris. The most intense periods of construction for the short-term planned/ongoing projects are not scheduled to be concurrent with the period of most intense construction under the proposed actions. Therefore, the combination of proposed actions and short-term planned/ongoing projects is not expected to change the situation at Gate #5 to increase queuing. Similarly, the long-term opportunities are not expected to occur with the intense periods of construction under the proposed actions; therefore, trucks supporting the proposed actions will not add to trucks from these projects to cause cumulative traffic impacts. Given the absence of queuing at Gate #5, there will be no effects to traffic off installation, and therefore, there will be no cumulative effects in relation to the projects off the installation.

Although there has been a loss of certain historic resources at NSA Bethesda over the past five years, the centerpiece landmark, the Central Tower Block, and its landscape

setting, have been protected. The DON and MHT executed a PA for Building C, which stipulates that avoidance of adverse effects to any previously identified historic properties is the preferred treatment and DON will utilize all feasible, prudent, and practical measures to avoid, minimize, or mitigate adverse effects. There will be no effect on historic properties from the MFD implementation.

Per NHPA, the Navy evaluated each potential historic resource individually and in the context of other historic resources in the vicinity; the process ensures that incremental impacts are considered and resolved. Among the short-term planned/ongoing projects, the USO is in proximity to the NRHP-eligible Flag Houses, and the Navy conducted Section 106 consultation for the project. The Navy received MHT's concurrence on its determination that the undertaking will have no adverse effects on historic properties. Renovations of Buildings 13 and 20 will impact the NRHP eligible, contributing historic properties to the NNMC Historic District. Before implementation of these projects, the Navy will conduct Section 106 consultation to resolve potential adverse effects on historic properties. Therefore, cumulative impacts on cultural resources will not be expected. Cultural resources impacts are specific to NSA Bethesda; therefore, MFD will not add to cumulative impacts on the external projects.

The implementation of the MFD is compatible with existing functional zones on NSA Bethesda. The MFD will be located within the property boundaries of NSA Bethesda and their land uses will be consistent with the fundamental medical care land use designated for NSA Bethesda. Therefore, they will not cause cumulative land use impacts within the installation. The MFD will also be consistent with the purposes of the National Institutes of Health (NIH) which is located across Rockville Pike from NSA Bethesda. Consequently, the MFD will be consistent with land uses within the region. Therefore, the MFD will not have cumulative impacts on land use.

The MFD will be located in an already highly developed area and will not significantly alter the aesthetic setting, and therefore, will not contribute to cumulative impacts. Construction of the new fire station, which is a long-term project, will result in a visual change from existing conditions at its proposed location. However, as the MFD will not result in impacts to the aesthetic setting, this long-term opportunity would not result in additive visual impacts relative to the MFD.

The MFD will add minimal growth and need for services in the region of influence (ROI) and the impacts will not be significant. The implementation of MFD is not expected to have a disproportionately high and adverse human health or environmental effect on minority, low-income, or younger segments of the local population, and will not cause cumulative impacts for purposes of environmental justice when considered with any other actions in the area. The traffic analysis for the EIS shows that there will be no significant impacts on any of the intersections or arterials of external roadways when comparing the 2018 No Build condition to the 2018 Build Alternatives with the implementation of the MFD. Therefore, the proposed actions will have no significant cumulative impacts on traffic in the area.

The short-term planned/ongoing and long-term opportunity projects are unlikely to produce hazardous waste in quantities that will have any effect in combination with that likely to be generated under the MFD. Because NSA Bethesda was built prior to the implementation of AT/FP standards, the majority of the existing facilities on the campus do not meet standoff distances or separation goals for buildings, parking, and perimeters. AT/FP standards will be evaluated and incorporated into the design of all new structures to be constructed under the short-term planned/ongoing and long-term opportunity projects. Therefore, in concert with the MFD, it is expected that cumulative beneficial impacts on human health and safety will occur. The projects external to NSA Bethesda are separated by distance and will not interact with projects at the installation from the perspective of human health and safety impacts.

ALTERNATIVES CONSIDERED – UNIVERSITY EXPANSION: The 2008 NNMC Master Plan identified an area south of the University campus for facility expansion. Since the 2008 Master Plan, a second location west of the USU campus was identified as a potential site for the expansion. These sites were selected based on the following selection criteria:

1. Address LCME accreditation requirements;
2. Unify 19 departments, activities, and centers currently dispersed in NSA Bethesda buildings or in leased space in and around Rockville, MD;
3. Resolve space constraints following BRAC integration; and
4. Position the USU for sustained relevancy as a competitive and lead academic institution for medical education and biomedical science research, and so enable the WRNMMC endeavors to achieve status as a World Class Academic Health Center.

Both alternative sites involve construction of an approximately 341,100 SF education and research facility (Building F) and an approximately 144,000 SF, 400-space parking structure that will serve USU and the overall parking needs across NSA Bethesda. Alternative 1 is located south of the existing USU campus in the wooded lot east of Grier Road; Alternative 2 is located west of the existing USU campus in the area between USU and AFRRRI.

Preferred Alternative – University Expansion. The proposed action for the University Expansion will implement Building F and a parking garage. DON selected Alternative 2, located west of the existing USU campus in the area between USU and AFRRRI, as the preferred alternative because of the development in an existing parking lot and minimal impacts to forested areas.

No Action Alternative – University Expansion. Under the No Action Alternative for the University Expansion, construction of an education and research facility, parking garage, and renovations to USU buildings will not occur. USU will continue to operate sub-optimally in 19 dispersed departments, centers, and activities in inadequate and temporary spaces at NSA Bethesda or in off-campus leased locations in Montgomery

County, Maryland. LCME accreditation of USU will be in jeopardy, and the institution will not be able to provide adequate education and research space to meet its MHS commitments.

Environmentally Preferred Alternative – University Expansion. Alternative 2 is also the environmentally preferred action alternative because of the development in an existing parking lot and minimal impacts to forested areas.

ENVIRONMENTAL IMPACTS - UNIVERSITY EXPANSION: The EIS evaluated the potential environmental effects associated with the University Expansion and the alternatives within several environmental resource areas: geology, topography, and soils; surface water and groundwater; floodplains; wetlands; vegetation; wildlife; aquatic and wetland habitat; threatened and endangered species; air quality; noise; utilities and infrastructure; transportation and traffic; cultural resources; land use and aesthetics; socioeconomics and environmental justice; and human health and safety. Methods to avoid, reduce, or minimize impacts to affected resources are addressed. The analysis includes an evaluation of the direct, indirect, and cumulative impacts. This ROD, however, focuses on the impacts and enhancement measures associated with the preferred alternative, University Expansion Alternative 2.

Minor impacts to geology will be expected. The project is located in an existing parking lot with surrounding landscaped areas and will create new impervious surface (approximately one acre depending on the final site design). The increase in runoff from the new impervious surface will be controlled with storm water management, including LID and the Maryland Department of Environment-approved erosion and sediment control plan. Per DON's communication with the USFWS except for occasional transient individuals, no federally proposed or listed endangered or threatened species or critical habitat are known to exist within the project site. Therefore, DON is not required to coordinate further with USFWS to satisfy Section 7 of ESA. Per DON's communication with the MDNR, the agency has determined that there are no state or Federal records of rare, threatened, or endangered species within the boundaries of the project site.

Emissions of air pollutants during construction and operations will not exceed *de minimis* levels or ambient standards established by the USEPA for protection of the airshed and thus air quality impacts will not be significant. Therefore, there will be no significant increase in greenhouse gases.

Short-term increases in noise levels will occur during construction and noise reduction/minimization measures will be employed, if required.

There will be sufficient capacity for telecommunication and sufficient power to support the expansion via an independent electrical feeder; however, DON will coordinate with the utility service provider to confirm the capacity once the exact requirements are known. For the increase in demand for potable water and natural gas, the initial utility coordination is based on the building footprint and DON will confirm the capacity once the exact requirements are known. DON is also coordinating with all utilities service

providers to ensure that the proposed changes will not affect service delivery to the larger community. The project will require steam/chilled water lines to connect to existing systems.

The University Expansion preferred alternative will generate new staff trips from the consolidated staff (220). The results from the Traffic Study conducted for the EIS showed that the operation of the University Expansion will generate between 135 and 161 new staff trips during the morning peak hour and between 163 and 193 new staff trips during the afternoon peak hour spread between Rockville Pike and Jones Bridge Road depending on the gate of entry and exit. No increase in student population is anticipated because the University Expansion will consolidate already existing activities that are dispersed in various locations on- and off-base; however, the new staff trips include students. The proposed 400-space parking garage will accommodate 110 staff spaces that will be relocated from Buildings 54 and 55 under the MFD and 62 staff spaces that will be eliminated by the construction of the University Expansion preferred alternative on the existing N-Lot parking lot. Some of these moved or shifted staff trips will enter and exit the installation through different gates than presently used, however, no significant impact on installation roadways will occur when comparing the 2018 No Build condition (No Action Alternative) to the implementation of the University Expansion preferred alternative.

There will be no effect to historic properties, including the NRHP-eligible AFRRI. The MHT concurred with these findings.

The project will be compatible with existing land use plans and land use planning underway within NSA Bethesda and will offer the potential for fostering a continuous campus feel between AFRRI and USU. The visual character of the area will not change noticeably as a result of the project and no impact is expected.

There will be beneficial economic impacts to the surrounding economy, resulting from the investment in construction and renovation of facilities but will not have a significant impact on the local economy. There will be no disproportionately high or adverse impacts on minority, low-income populations, or children.

Adherence to applicable regulations and guidance will avoid impacts to human health and safety during construction and operation of the University Expansion.

Cumulative Impacts – University Expansion: The implementation of preferred alternative University Expansion Alternative 2 is not anticipated to result in a significantly greater incremental impact when added to the actions of the other projects evaluated under cumulative impacts in the EIS, including the MFD.

The University Expansion is also a component of the 2013 NSA Bethesda Master Plan. The short-term planned/ongoing projects and long-term opportunity areas are: Sanctuary Hall and Garage (Wounded Warrior Transition Lodge), CDC, USO, Navy Lodge Expansion, Rockville Pike Crossing, Building 20 renovation, and Active Recreation Area Improvements along with the Helipad Expansion, Building 13 Renovations, Warehouse

Area Redevelopment, Kiss and Ride Facility; Buildings 54 and 55 (parking garages) Replacements; Building 50 (Mercy Hall) Redevelopment; Wounded Warrior Area Improvements; G-Lot Medical Expansion; Building 26 AT/FP Renovation; Satellite Pharmacy Relocation; and Structured Parking Opportunities (Taylor Road Redevelopment, N-Lot Garage), and New Fire Station. Cumulative impacts were also evaluated in the context of the short-term planned/ongoing projects and long-term opportunity areas at the installation. Both construction and operation impacts were evaluated in the context of the cumulative impacts discussion. For the potential future development opportunities, the Navy will ensure the appropriate NEPA review and coordination is completed when the projects are proposed for implementation.

The increases in impervious surfaces from the University Expansion preferred alternative, when combined with the increase in impervious surfaces associated with these recently completed, ongoing, and planned actions, will result in increases in stormwater runoff. However, construction of recently completed and short-term planned/ongoing projects at NSA Bethesda have and will be conducted in accordance with all applicable regulatory requirements for erosion and sediment control and stormwater management, thereby greatly reducing their impacts. These projects will also incorporate LID and green infrastructure, including LEED® features, further reducing impacts on water resources.

The University Expansion preferred alternative will occur in currently developed areas and, therefore, there will be minimal impacts on biological resources and cumulative impacts on biological resources are not anticipated. The air quality analysis took the overall health of the airshed into consideration and is conducted, per regulation, separately for each proposed project. Project air emissions were shown to be below stated *de minimis* levels or thresholds and, therefore, cumulative air quality effects will not be significant and will not pose a significant incremental effect to any other actions within the airshed, including the short-term planned/ongoing projects occurring at NSA Bethesda, which must be separately evaluated by applicability analyses. There will be no significant increase in greenhouse gases.

Cumulative noise impacts were evaluated from the construction activities because the University Expansion will occur concurrently with various components of the MFD as well as the short-term planned/ongoing projects. The distance between projects, intervening structures and topography, and noise attenuation measures, and the short-term planned/ongoing projects as appropriate, will result in minimal additive impacts on construction noise generated by any concurrent projects. Therefore, no cumulative adverse noise impacts are anticipated.

Short-term planned/ongoing/recently completed projects, including those addressed in the EIS, will increase the overall utility demands for the installation. These projects are identified in the 2013 NSA Bethesda Master Plan and have been included in prior master plan updates. This installation-wide advance planning approach provides a basis for the coordinated construction of utility improvements versus constructing piecemeal improvements as the various NSA Bethesda projects come to fruition. Some of the short-

term planned/ongoing projects include replacing outdated buildings with LEED® Silver designed energy efficient ones.

Local providers for electricity, water, and wastewater services indicated that the increased utility demands required to support NSA Bethesda's short-term planned/ongoing projects will be met. The Navy is coordinating with the service providers to ensure that these proposed changes will not affect service delivery to the larger community by verifying that the system can accommodate the additional load. Long-term projects and opportunities will further increase the installation's demands for utilities. Specific utility demands for these projects have not yet been developed. When these projects become more defined, NSA Bethesda will share the potential utility demands with local and regional suppliers so these demands will be incorporated along with other regional growth into the suppliers' long-term planning strategies.

The EIS evaluated the projected growth in the region based upon the background development (proposed projects outside of NSA Bethesda), the approved future roadway projects, and short-term planned/ongoing projects as part of the 2018 No Build condition. As discussed, one completed project, the new Navy Exchange and parking garage, is also included in the No Build condition. Impacts for each of the 2018 Build Alternatives were assessed with the project growth and roadway improvements from the 2018 No Build condition, plus the addition of new trips generated by the University Expansion. Each 2018 Build Alternative considered the addition of new trips generated by the University Expansion based on a maximum projected trip generation resulting from the proposed 220 new employees. The EIS evaluated the traffic impacts of truck traffic required to bring in construction materials and remove demolition or construction debris. The most intense periods of construction for the short-term planned/ongoing projects will not be concurrently scheduled, to the extent practicable, with the period of most intense construction periods of the proposed actions. Therefore, the combination of proposed actions and short-term planned/ongoing projects will not result in truck traffic queuing onto Jones Bridge Road. Therefore, there will be no significant cumulative effects in relation to traffic off the installation.

There will be no effect on historic properties from University Expansion; therefore, the project will not contribute to cumulative impacts on historic properties.

The implementation of the University Expansion is compatible with existing functional zones on NSA Bethesda. The University Expansion will be located within the property boundaries of NSA Bethesda and its land uses will be consistent with the fundamental medical care land use designated for NSA Bethesda. Therefore, it will not cause cumulative land use impacts within the installation. The University Expansion will also be consistent with the purposes of the NIH which is located across Rockville Pike from NSA Bethesda. Consequently, the University Expansion will be consistent with land uses within the region. Therefore, the University Expansion will not have cumulative impacts on land use.

The University Expansion will be located in an already highly developed area and additional construction will not alter the aesthetic setting, and therefore, will not

contribute to cumulative impacts. Construction of the new fire station, which is a long-term project, will result in a visual change from existing conditions at its proposed location. However, as the University Expansion will not result in impacts to the aesthetic setting, this long-term opportunity would not result in additive visual impacts relative to the University Expansion.

The University Expansion preferred alternative will be sited on land that is designated under the long-term opportunity areas for construction of an N-Lot parking garage that will service patients, visitors, and staff of NSA Bethesda. Construction of the University Expansion on this land will not allow the construction of the N-Lot parking garage.

The University Expansion preferred alternative will add minimal growth and need for services in the ROI and the impacts will not be significant. The implementation of University Expansion preferred alternative is not expected to have a disproportionately high and adverse human health or environmental effect on minority, low-income, or younger segments of the local population, and will not cause cumulative impacts for purposes of environmental justice when considered with any other actions in the area. The traffic analysis for the EIS shows that there will be no significant impacts on any of the intersections or arterials of external roadways when comparing the 2018 No Build condition to the 2018 Build Alternatives with the implementation of the University Expansion preferred alternative. Therefore, the University Expansion will not have cumulative impacts on the traffic in the area.

The short-term planned/ongoing and long-term opportunity projects are unlikely to produce hazardous waste in quantities that will have any effect in combination with that likely to be generated under University Expansion preferred alternative. Because NSA Bethesda was built prior to the implementation of AT/FP standards the majority of the existing facilities on the campus do not meet standoff distances or separation goals for buildings, parking, and perimeters. AT/FP standards will be evaluated and incorporated into the design of all new structures to be constructed under the short-term planned/ongoing and long-term opportunity projects. Therefore, in concert with University Expansion preferred alternative, it is expected that cumulative beneficial impacts on human health and safety will occur. The projects external to NSA Bethesda are separated by distance and will not interact with projects at the installation from the perspective of human health and safety impacts.

ENHANCEMENT MEASURES: Implementing the Preferred Alternatives for the MFD and University Expansion will result in minimal impacts on most environmental resources. Per Navy policy, LEED® Silver features will be integrated into the design, development, and construction of the projects. Design, development, and construction of the MFD and University Expansion will comply with the LID requirements adopted by the Navy to the greatest degree possible.

The DON has identified enhancement measures to complement the required compliance to reduce impacts on surface waters from potential soil erosion and runoff, for control of fugitive emissions to the air, for construction noise, and for traffic impacts that will be generated by the action alternatives.

Sediment and Erosion Control Measures: Measures to be considered include, but are not limited to, the following:

- Using erosion containment controls such as silt fencing and sediment traps to contain sediment onsite where necessary
- Covering disturbed soil or soil stockpiles with plastic sheeting, jute matting, erosion netting, straw, or other suitable cover material, where applicable
- Inspecting erosion and sediment control BMPs on a regular basis and after each measurable rainfall to ensure that they are functioning properly, and maintain BMPs (repair, clean, etc.) as necessary to ensure that they continue to function properly
- Sequencing BMP installation and removal in relation to the scheduling of earth disturbance activities, prior to, during, and after earth disturbance activities
- Phasing clearing to coincide with construction at a given location to minimize the amount of area exposed to erosion at a given time

Stormwater Management Measures: The following nonstructural stormwater management practices will be considered and applied according to the Maryland Stormwater Design Manual to minimize increases in new development runoff: 1) natural area conservation; 2) disconnection of rooftop runoff; 3) disconnection of non-rooftop runoff; 4) sheet flow to buffers; 5) grass channels; and 6) environmentally sensitive development. The LID measures will be among those considered and implemented when practical.

The following structural stormwater management practices will be considered and designed according to the Maryland Stormwater Design Manual to satisfy the applicable minimum control requirements established in Section 4.1 of the Maryland Stormwater Management Guidelines: 1) stormwater management ponds; 2) stormwater management wetlands; 3) stormwater management infiltration; 4) stormwater management filtering systems; and 5) stormwater management open channel systems.

Areas disturbed outside of the footprints of the new construction will be aerated and reseeded, replanted, and/or re-sodded following construction activities, which will decrease the overall erosion potential of the site and improve soil productivity.

Air Quality Construction Measures: The NSA Bethesda air permit requires all reasonable precautions be taken to prevent particulate matter emissions during construction or demolition. During construction and demolition, fugitive dust will be kept to a minimum by using control methods. These precautions will include, but are not limited to, the following:

- Use, where possible, of water for dust control
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials
- Covering of open equipment for conveying materials
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion

- Employment of a vehicle wash rack to wet loads and wash tires prior to leaving the site

Noise Reduction Measures during Construction: Measures to control airborne noise impacts that will be considered and implemented as appropriate include:

- Source limits and performance standards to meet fence line noise level thresholds for daytime, evening, and nighttime hours at sensitive land uses (Montgomery County Noise Ordinance)
- Designated truck routes
- Establishment of noise-monitoring stations for measuring noise prior to and during construction
- Design considerations and project layout approaches including measures such as construction of temporary noise barriers, placing construction equipment farther from noise-sensitive receptors, and constructing walled enclosures/sheds around especially noisy activities such as pavement breaking
- Sequencing operations to combine especially noisy operations to occur in the same time period
- Alternative construction methods, using special low noise emission level equipment, and selecting and specifying quieter demolition or deconstruction methods

Control measures for sensitive receptors include: sequencing operations, use of alternative construction equipment and methods and instituting other special control measures to reduce the transmission of high noise levels to noise-sensitive areas. A construction phasing plan will be coordinated with patient moves to avoid impacts on patients. All construction work will be required to ensure compliance with the Montgomery County Noise Ordinance (Note: Standard hours of operation will be approximately 7:00 am to 3:30 pm; however, the contractor could request to work outside that timeframe provided the work complies with the relevant maximum allowable noise levels set forth in the Montgomery County Noise Ordinance).

Compliance with the Occupational Safety and Health Administration standards for occupational noise exposure associated with construction (29 CFR 1926.52) will address the staff and construction workers' hearing protection.

Measures to Address Traffic:

The Installation Transportation Management Plan (TMP) will continue to be implemented to reduce the number of vehicle trips on the external and internal roadway system by using the Metro, Montgomery County transit system, vanpools, carpools, and bicycle trails. The sustained implementation of the TMP will continue to ensure that the transportation system in the area functions efficiently.

AGENCY CONSULTATION AND COORDINATION:

NHPA: DON initiated and engaged in early and frequent coordination with the MHT and the NCPC on NHPA Section 106. In a letter dated 11 October 2011, shortly after

NOI publication, DON initiated formal consultation under Section 106 with the MHT and ACHP for the various projects in the EIS as “undertakings” with the potential to affect historic properties. ACHP declined to participate in a letter dated 16 November 2011, with the request to be notified should an adverse effect occur or PA be required. Subsequently, DON continued to consult informally with MHT and NCPC staff. In a letter to the MHT dated 14 December 2012, DON resumed the formal Section 106 consultation process and designated areas of potential effect for the undertakings. DON also made initial determinations of either “no effect” or “no adverse effect” on historic properties for all of the undertakings addressed in the EIS, except for Building C and the Underground Parking Garage. For these undertakings, DON indicated its intent to develop a PA, because no concept design for these facilities would be available prior to the anticipated signature date of the ROD. Lastly, DON accepted NCPC’s request to be a Consulting Party under Section 106 regulations.

In a letter dated 16 January 2013, the MHT responded that the demolition of certain features of the Front Lawn (lawn, terrace, and flagpole) and the construction of the Underground Parking Garage will constitute an adverse effect on Building 1 (Central Tower Block) and its landscape setting under Section 106. MHT recommended that DON implement one of the above-ground parking alternatives for the MFD. In the same letter, MHT concurred with DON’s “No Effect” determinations for the University Expansion, H-Lot parking garage, and accessibility and improvement project (University Entry); “No Adverse Effect” determinations for the utilities upgrades, temporary medical facilities, and accessibility and improvement projects (Courtyard, Stoney Creek Trail System, and Memorial Grove); and, in accordance with DON’s continued consultation with MHT during design, “No Adverse Effect” determinations for interior renovations (Buildings 1, 3, 5, 9, and 19) and accessibility and improvement projects (North Palmer Road and Building 17 Connector). MHT concurred with DON on the plan to develop a PA for Building C.

In response to the MHT letter dated 16 January 2013, DON decided that an underground parking garage below the Front Lawn will not be considered the preferred alternative for meeting the parking requirements of the MFD. In a letter dated 4 February 2013, DON requested active participation of the ACHP in the development of the PAs for the Underground Parking Garage and Building C, but this request preceded DON’s decision to drop underground parking as the preferred alternative. On 1 March 2013, DON provided a status update to MHT, ACHP, and NCPC on the Underground Parking Garage and informed the agencies that DON had elected to change the preferred alternative for the MFD parking garage to the H-Lot site, an above-ground garage. In a letter dated 11 March 2013, the ACHP responded that the agency will not be participating in the PA. The ACHP also stated that DON must file final documentation with the ACHP at the conclusion of the consultation process to complete Section 106 compliance.

DON and MHT executed a PA on 17 June 2013 for Building C. The PA is included in Appendix A of the Final EIS. In the PA, DON will ensure that avoidance of adverse effects to any previously identified historic properties is the preferred treatment and will utilize all feasible, prudent, and practical measures to avoid, minimize, or mitigate

adverse effects. Per the PA, DON, in coordination with the SHPO, will ensure that the following measures are incorporated into the design process for Building C:

- A. DON will ensure that Building 1 remains intact by preserving the original design, materials and workmanship on the east elevation to the maximum extent possible and by maintaining the building as a visually distinct element from the new construction. Treatment of Building 1 will be consistent with the Secretary of the Interior's Standards for Preservation (36 CFR Section 68).
- B. The new construction will be compatible with the NNMC Historic District in terms of materials, features, size, scale, proportion, and massing. The design will be consistent with the standards for new construction set forth in the Secretary of the Interior's Standards for Rehabilitation (36 CFR Section 68).
- C. DON will first strive to design the new construction so as not to be visible from the front lawn or the original circular drive approaching Building 1. If program requirements preclude this, DON will, to the maximum extent possible, design the new construction in a way that minimizes its visibility from the front lawn and circular drive.

RESPONSES TO COMMENTS RECEIVED ON THE FINAL EIS: The Navy reviewed and considered all comments that were received during the 32-day wait period following the issuance of the NOA of the Final EIS. The comments and responses summarized here represent new substantive comments not previously addressed. A total of 9 letters or e-mails totaling 53 comments were received on the Final EIS. All but three (3) of the comments were similar or identical to comments received and addressed in the Draft EIS or were unrelated to the EIS and its proposed actions. The majority of the comments received were concerned with traffic. The next most significant number of comments concerned visual/aesthetic impacts and noise. Comments warranting specific responses are provided below.

Traffic: The commenter stated that the 2013 Final EIS for the MFD and University Expansion at NSA Bethesda, Maryland should offer no support for the Rockville Pike/Cedar Lane improvements proposed by the MSHA because the 2008 NNMC BRAC EIS ROD recommended no further study for constructing an additional westbound left turn lane on Cedar Lane; and the MSHA-approved traffic analysis methods are technically deficient.

Response: The 2013 Final EIS for the MFD and University Expansion at NSA Bethesda, Maryland considered the cumulative impacts of all past, present, and reasonably foreseeable future actions, per the requirements of NEPA and its implementing regulations. The inclusion of the Rockville Pike/Cedar Lane intersection improvements as well as the corridor analysis in the traffic study meets the regulatory requirements of including all reasonably foreseeable roadway and transportation related improvements as part of the alternatives analysis and the cumulative impacts analysis. The inclusion of the improvements to the Rockville Pike/Cedar Lane Improvements as part of the Final EIS traffic analysis does not imply a DON opinion on the Rockville Pike/Cedar Lane intersection improvements but compliance with Federal law requiring analysis of all reasonably foreseeable future transportation improvements.

Regarding further investigation of the Rockville Pike/Cedar Lane intersection, the 2008 NNMC BRAC Final EIS response to comments, addresses that, given the physical constraints and challenges associated with the intersection, this intersection improvement is recommended for further analysis by those state/local transportation agencies with jurisdiction over that intersection. Regarding the SHA-approved traffic analysis methods, the technical and highway capacity analyses conducted for the 2013 Final EIS Traffic Study used the principles as contained in the Transportation Research Board Highway Capacity Manual and followed the methodologies and procedures as proscribed by Montgomery County and the MSHA including the Critical Lane Volume Procedure.

Visual/Aesthetic Impacts: Commenters were concerned with visual encroachment into the surrounding community, particularly for those projects near to the fenceline and potentially requiring tree removal for construction.

Response: DON is committed to limiting the impacts of its actions, to the extent possible, on the surrounding community. DON will site these projects, to the extent possible, in a manner to limit visual intrusion and preserve existing vegetative buffers to the surrounding community. In those situations where existing vegetation is removed, DON will replant to the extent possible to preserve the long-term vegetative buffer with the surrounding community while maintaining compliance with applicable security requirements.

Noise: One commenter requested clarification to a previously submitted comment on when the project will comply with the Montgomery County Noise Ordinance.

Response: The DON will seek to comply with the Montgomery County Noise Ordinance at external receptors, to the maximum extent possible, during construction and operation of the MFD and University Expansion.

CONCLUSIONS: On behalf of DON, and based on all relevant factors addressed in the Final EIS, I have selected implementation of MFD (with the H-Lot parking garage) and University Expansion Alternative 2 at NSA Bethesda, Bethesda, MD.

In reaching this determination to implement the MFD with H-Lot parking garage and the University Expansion Alternative 2, I have considered the superior functional efficiency, lower costs, and lower environmental impacts associated with the H-Lot parking garage alternative. I have taken into account the consultation process with the MHT and the NCPC regarding cultural resources. I have considered recommendations and comments provided by Federal, state, and local agencies and committees, and the general public throughout the NEPA process, including during formal comment and review periods. I have considered enhancement measures identified in the Final EIS. I also took into account the fact that the implementation of the MFD is required by Congressional mandate in the 2010 NDAA and that the No Action Alternative will result in non-compliance with the mandate. Consistent with this record of decision, and the Final EIS, the DON will implement the preferred alternatives and address all enhancement measures.

8/29/13

Date



Roger M. Natsuhara

Principal Deputy Assistant Secretary of Navy
(Energy, Installations and Environment)