



DEPARTMENT OF THE NAVY
NAVAL SUPPORT ACTIVITY BETHESDA
4655 TAYLOR ROAD
BETHESDA MARYLAND 20889-5639

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NOV 04 2020

Ms. Lisa B. Choplin, DBIA
Director, I-495 and I-270 P3 Project Office
Maryland Department of Transportation State Highway Administration
707 North Calvert Street
Mail Stop P-601
Baltimore, MD 21201

Dear Ms. Choplin,

SUBJECT: NAVAL SUPPORT ACTIVITY BETHESDA COMMENTS FOR I-495 AND I-270
P-3 PROJECT ENVIRONMENTAL IMPACT STATEMENT – DRAFT
ENVIRONMENTAL IMPACT STATEMENT

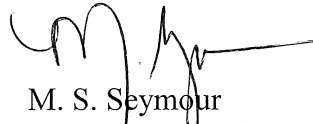
Naval Support Activity (NSA) Bethesda staff members have reviewed the Draft Environmental Impact Statement (DEIS) for the above mentioned project. Based on that review, NSA Bethesda forwards the following comments:

- a. On page 4-18 of the DEIS, Maryland Department of Transportation (MDOT) asserts they will acquire Navy property for the construction of the toll roads. As previously stated in multiple letters from the installation to MDOT, the Navy will not cede any property for the construction of this toll road. Doing so would compromise Antiterrorism/Force Protection guidelines and impact the NSA Bethesda mission. The Navy requests the project remove the property acquisition from consideration in the build alternatives analysis.
- b. In light of the ongoing disagreement over right-of-way (ROW) and fence line impacts (see previous Navy correspondence), the Navy finds the MDOT analysis of the construction footprint to be woefully inadequate. The information in the DEIS shows disruption to mission critical infrastructure in the northeast corner of the installation without providing any technical information on the potential size and duration of those impacts. Impacts to those facilities and infrastructure will cause an immediate degradation of installation support services to Walter Reed National Military Medical Center and mission critical construction. This is a direct contradiction to the DEIS assumption that “impacts to any individual facility would not alter access to or use of the hospital facilities.”
- c. The DEIS analysis fails to consider the impacts of recent changes to the Metro Purple line. This document is supposed to analyze a multi-modal transportation system, yet focuses exclusively on toll roads.

d. The DEIS transportation analysis fails to evaluate the impacts of COVID-19 on the transportation system, both road and mass transit use. These impacts are changing commuter behavior and should be reflected in this document.

Should you have any questions concerning these comments, my point of contact for this issue is NSA Bethesda's Installation Environmental Programs Director, Ms. Susan Paul, who may be reached at (301) 295-2482 or susan.paul@navy.mil.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. S. Seymour', with a long horizontal stroke extending to the right.

M. S. Seymour
Captain, Medical Service Corps
U. S. Navy
Commanding Officer

Copy to:
NAVFACENCOM Washington DC (EV2)