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NATIONAL CAPITAL PLANNING COMMISSION

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Patricia E. Gallagher, AICP

IN REPLY REFER TO:
NCPC File No. 6598

August 18, 2005

The Honorable Anthony J. Principi
Chairman, 2005 Defense Base Closure and
Realignment Commission
2521 South Clark Street, Suite 600
Arlington, Virginia 22202

Dear Mr. Principi:

Thank you for the opportunity to comment on the recommendations of the Defense Base Closure and Realignment (BRAC) Commission.

Under the National Capital Planning Act of 1952 (the Act), the National Capital Planning Commission (NCPC) is charged with providing overall planning guidance for federal land and buildings in the National Capital Region (NCR). The Act also requires that NCPC prepare and adopt a *Comprehensive Plan for the National Capital: Federal Elements* (Comprehensive Plan). This plan is a blueprint for long-term development in the NCR and serves as the decision-making framework upon which NCPC approves or rejects plans and proposals submitted for its review. We believe the plan's policies should be taken into consideration as the BRAC Commission evaluates its recommendations.

NCPC's Comprehensive Plan recognizes the significant influence the distribution of federal installations has on determining the region's development. With this in mind, the plan promotes efficient federal activities; encourages "smart growth" and sustainable development practices; and supports local and regional planning and development objectives. While we recognize that our Comprehensive Plan contemplates some consolidation for efficiency or to facilitate security, we are concerned that some of the BRAC recommendations may result in actions contrary to other goals and principles of this important planning document.

For example, some proposed BRAC recommendations isolate Department of Defense operations from other federal facilities and private businesses with which they interact. This conflicts with our Comprehensive Plan policy to encourage the

efficient operation of the federal government by supporting the concentration of federal facilities in urbanized areas. Such concentration enables federal employees to be close to federal partners with whom they interact frequently and to private suppliers of goods and services that are vital to operations. The Comprehensive Plan policies ensure compliance with Executive Order 12072, which encourages the location of workplaces in central cities.

NCPC is concerned that some BRAC recommendations propose to relocate federal activities to areas that are far from public transit and isolated from their surrounding communities. Considering the NCR's status as one of the most congested areas in the country, the Comprehensive Plan urges federal agencies to employ effective transportation management programs at their work sites. These strategies are also consistent with Executive Order 12072 and Executive Order 13006, Locating Federal Facilities on Historic Properties in our Nation's Central Cities.

In addition, Department of Defense security standards have been applied to leased office facilities, potentially rendering them unsuitable in the long-term for their current Department of Defense tenants. This issue is of extreme interest to NCPC in that our Comprehensive Plan and *National Capital Urban Design and Security Plan* both call for the implementation of security measures that are appropriate for the size and use of the facility. A one-size-fits-all solution should be an exception and not the rule if America is to retain its values of a free and open society.

As background, NCPC has been actively involved in efforts to seamlessly integrate urban design and security in the NCR. Our agency helped guide security plans for Pennsylvania Avenue in front of the White House, the recently enhanced security measures at the Washington Monument, and security improvements at numerous other memorials, federal precincts, and facilities. We strongly encourage the use of site-specific solutions, and we are committed to identifying the most innovative approaches in security design. Such approaches may make several of the proposed moves from leased space unnecessary.

We urge you to take this information into consideration when evaluating the merits of the proposed base realignments and closures. Further, if the National Capital Planning Commission can be of any assistance in providing information to support your decisions, please contact our Executive Director, Patricia Gallagher, at 202-482-7200.

Sincerely,

John V. Cogbill, III
Chairman

Enclosures – *Comprehensive Plan for the National Capital: Federal Elements*
National Capital Urban Design and Security Plan

cc: The Honorable James H. Bilbray
The Honorable Philip Coyle
Admiral Harold W. Gehman, Jr., (USN, Ret)
The Honorable James V. Hansen
General James T. Hill (USA, Ret)
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