

Appendix F:

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

October 25, 2019

Anna Chamberlin
Neighborhood Planning Manage and Sustainability Division
District Department of Transportation
55 M Street SE, Suite 400
Washington DC 20003

David Valenstein
Railroad Policy and Development
Federal Rail Administration
1200 New Jersey Ave SE
Washington, DC 20590

Re: Draft Environmental Impact Statement and Draft Section 4(F) Evaluation, Long Bridge Project,
District of Columbia and Arlington VA, CEQ #20190221

Dear Ms. Chamberlain and Mr. Valenstein:

In accordance with the National Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental protection Agency (EPA) has reviewed the Federal Railroad Administration (FRA) and the District Department of Transportation (DDOT) Draft Environmental Impact Statement (DEIS) for the Long Bridge Project. The proposed project would provide needed additional long-term railroad capacity to address planning year 2040 and improve the reliability of railroad service through the Long Bridge Corridor from Arlington, Virginia and L'Enfant (LE) Interlocking near 10th Street in the District of Columbia.

The purpose and need of the Proposed Action are to provide additional rail capacity and to improve the reliability of railroad service through the Long Bridge Corridor. Currently, there is insufficient capacity, resiliency, and redundancy to accommodate the projected demand in future railroad services. The Proposed Action is needed to address these issues and to ensure the Long Bridge Corridor continues to serve as a critical link connecting the local, regional, and national transportation network.

We appreciate the thoroughness of the document's alternatives discussion and the coordination done by FRA with resource agencies including the National Marine Fisheries Service (NMFS). We suggest that the final EIS (FEIS) provide more detail on the coordination, including future coordination, with NMFS. It is noted in the DEIS that impact to submerged aquatic vegetation (SAV) is likely from a



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new structure crossing the Potomac River. SAV has important function as aquatic habitat and in water quality. EPA recommends consideration of mitigation for the potential loss of SAV resource. As design plans advance, EPA recommends FRA investigate opportunities for the placement of green infrastructure best management practices (BMPs) in the study area to further capture stormwater runoff from entering the Potomac River. Please see more detail in our attached technical comments.

We ask that you consider our comments in this letter and enclosure in preparation of the FEIS. We would also welcome the opportunity to discuss any of these comments. Please feel free to contact me at (215) 814-3322 or rudnick.barbara@epa.gov or Ralph Spagnolo at (215) 814-2718, spagnolo.ralph@epa.gov with any comments or questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Barbara Rudnick', written in a cursive style.

Barbara Rudnick
NEPA Program Coordinator
Office of Communities, Tribes & Environmental
Assessment

Enclosure
Detailed Comments for Draft Environmental Impact Statement
Long Bridge Project

EPA has the following recommendations for consideration in the development of the final EIS:

Natural Ecological Systems (Section 5.4.1)

Terrestrial vegetation (Section 5.4.1.1)

The preferred Action Alternative A will have permanent impacts to 3.7 acres of narrow strips of vegetation along the linear footprint of the proposed bridge. It is recommended that impacts to this vegetation be minimized and if permanent impacts result, we encourage consideration of compensatory mitigation for the loss of resource.

SAV (5.4.1.3)

The DEIS states that there is potential permanent impact a total of 2,650 square feet of SAV from the pier construction and shading from the new deck, and some additional impact from the pedestrian walkway, based on the latest aerial survey performed by the Virginia Institute for Marine Science in 2017 (VIMS). If these impacts cannot be avoided, we recommend that compensating for the permanent loss be considered by FRA. Additionally, if there is a possibility of indirect impacts to SAV beds downstream in the Potomac River, resulting from scour and deposition from the installation of crossing piers, EPA suggests addressing minimization of these potential impacts in the FEIS. As VIMS has not performed a complete SAV survey since 2017, it may be prudent and beneficial to perform multi-year field surveys of the existing SAV beds prior to construction to update available information on the SAV resource condition and coverage in the local area. EPA would appreciate an opportunity to contribute and participate in the SAV field survey planning and implementation.

Rare, Threatened and Endangered Species (5.4.2.2)

EPA appreciates continued coordination with the National Marine Fisheries Service (NMFS) as the project proceeds forward, including consultation to determine recommendations on time-of-year restrictions and minimization techniques to migrating fish species. We suggest that the FEIS explain what measures will be implemented to minimize the impacts to all fish species during the construction phase, especially during the installation of bridge piers (this may include need for vibration attenuation such as bubble curtains to reduce impact to fish). We recommend the FEIS further address FRA's and DDOT's coordination with the NMFS for avoidance and minimization to migratory fish species, especially the *Acipenser brevirostrum*, shortnose sturgeon, and *Acipenser oxyrinthus*, atlantic sturgeon.

Stormwater (6.3.1.3.)

It is mentioned in the DEIS that a stormwater management plan will be developed for the project in the design phase and it will detail the location and design of all planned stormwater management facilities. EPA recommends the FEIS include a proposed or preliminary stormwater management plan, identifying potential locations for best management practices (BMPs). We suggest the plan include the type of BMPs being evaluated and estimate the amount of stormwater runoff they would treat. We recommend

evaluation of the use of green infrastructure techniques such as bio-swales, rain gardens, porous pavement, etc.

Air Quality and Greenhouse Gases (10.0)

Regulatory Context (10.2.1)

It is recommended that a citation to the general conformity rule (40 CFR part 93, subpart B) and the *de minimis* thresholds (40 CFR 93.153) be included in the discussion of general conformity on page 10-2. Page 10-2 states, “Arlington County does not have regulations or ordinances that govern air pollutant emissions.” Note that Arlington County is included in the Washington, DC-MD-VA marginal nonattainment area for the 2015 8-hour ozone NAAQS. Therefore, Virginia laws and regulations for both attainment and marginal nonattainment areas apply to Arlington County as well as the federal Clean Air Act (CAA).

Air Quality (10.2.2.1)

It is recommended that the paragraph on page 10-4 regarding the quantitative construction air quality analysis explain that the project is in the Washington, DC-MD-VA marginal nonattainment area for the 2015 8-hour ozone NAAQS, therefore, pursuant to the general conformity rule at 40 CFR part 93, subpart B and 40 CFR 93.153, a general conformity applicability analysis is required.

Ambient Air Quality (10.3.1)

Table 10-1 on page 10-6 shows 2017 design values, which are calculated using 2015-2017 monitoring data. However, page 10-5 refers to the data in Table 10-1 as being from 2014 to 2016. Also, note that 2018 design values are available.

Page 10-5 states, “The EPA designates the District and Arlington County as nonattainment areas for 8-hour O₃...”. It is recommended that it be clarified that the District and Arlington County are designated as marginal nonattainment for the 2015 8-hour ozone NAAQS. Both areas are maintenance for the 2008 8-hour ozone NAAQS. It is suggested that a reference to EPA’s Green Book at <https://www.epa.gov/green-book> be included.

Air Quality Index (10.3.2)

Page 10-6 provides background information on the Air Quality Index (AQI) but does not include information specific to the project area. We would be pleased to discuss recommended detailed air quality data for the study.

Regional Greenhouse Gas Emissions (10.3.3)

EPA recommends Table 10-2 Air Quality Index and Associated Health Effects be moved under section 10.3.2 Air Quality Index.



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

IN REPLY REFER TO:

October 28, 2019

9043.1
ER 19/0417

Anna Chamberlin, AICP
Long Bridge Project
55 M Street, SE
Suite 400
Washington, DC 20003-3515

Dear Ms. Chamberlin:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) and draft Section 4(f) Evaluation for the Long Bridge Project (the Project), which connects Arlington, Virginia to Washington D.C. The Department submits the following comments in accordance with provisions of the National Transportation Act of 1966, as amended 23 U.S.C. 138 and 49 U.S.C. 303, referred to as Section 4(f), and the applicable regulations at 23 C.F.R. 774, and other regulations and guidance.

The Department understands that the Federal Railroad Administration (FRA), jointly with the District Department of Transportation (DDOT) are the lead agencies that have prepared the DEIS and Draft Section 4(f) Evaluation for the Project. The Virginia Department of Rail and Public Transportation (DRPT) is the named Project Sponsor for the future phases of the Long Bridge project.

The purpose of the Project is to provide additional long-term railroad capacity and to improve the reliability of railroad service through the Long Bridge Corridor, a 1.8-mile railroad corridor between RO Interlocking in Arlington, Virginia, and L'Enfant Interlocking near 10th Street SW in the District of Columbia. The location of this proposal is in the Capitol Hill neighborhood of the District of Columbia (District) beneath eastbound Virginia Avenue SE from 2nd Street SE to 9th Street SE; Virginia Avenue Park between 9th and 11th Streets; and the 11th Street Bridge right-of-way. Construction is anticipated to start 2022 and last for approximately four to five years. The proposed new infrastructure includes a new two-track railroad bridge and a bicycle/pedestrian bridge over the Potomac River that will transect both the National Mall and Memorial Parks (NAMA) and the George Washington Memorial Parkway (GWMP). Because of the Project's impacts to these National Park Service (NPS) administrative units, the NPS is

serving as a cooperating agency on this project and has been coordinating with FRA, DDOT, and DPRT during the development of the DEIS.

As part of this DEIS and draft Section 4(f) Evaluation process, a number of different preliminary concepts were developed. Following an evaluation of these concepts several failed to meet the Project's overall purpose and need, and were dismissed from further analysis. The two action alternatives evaluated in the DEIS include:

- **Alternative A** - Action Alternative A would construct a new two-track railroad bridge over the Potomac River and the GWMP between the existing railroad bridge and the Metrorail Bridge. It would expand the Long Bridge Corridor from two to four tracks, including all necessary infrastructure improvements from RO Interlocking in Arlington, Virginia through LE Interlocking in the District. This alternative would retain the existing Long Bridge over the Potomac River as well as the railroad bridge over the GWMP.
- **Alternative B** - Similar to Action Alternative A, Action Alternative B would construct a new two-track railroad bridge over the Potomac River and the GWMP between the existing railroad bridge and the Metrorail Bridge. However, Action Alternative B would also replace the existing Long Bridge and the railroad bridge over the GWMP rather than keeping those bridges. In addition to replacing the bridge over the GWMP and Long Bridge, Action Alternative B would expand the Long Bridge Corridor from two to four tracks in the same manner as Action Alternative A.

As stated in the DEIS and draft Section 4(f) Evaluation, both build alternatives have approximately the same layout (i.e., they would cover approximately the same surface area during and after construction). Of the two build alternatives being considered, Alternative A was identified as being a preferred alternative in the DEIS and draft Section 4(f) Evaluation. Under both alternatives, a bicycle-pedestrian bridge with connections to Long Bridge Park, the Mount Vernon Trail, and Ohio Drive SW located between the Metrorail Bridge and a new upstream railroad bridge is being considered as potential mitigation for impacts to properties protected under Section 4(f).

After review of the DEIS and draft Section 4(f) Evaluation, the Department understands that, due to the current location, this project will result in significant permanent and temporary impacts of the following Section 4(f) resources:

- **The GWMP/Mount Vernon Memorial Highway** - Congress established the GWMP in May 1930, as one of the nation's premiere parkways, in the 1930s to commemorate the first President of the United States, provide scenic drives and connectivity to historic sites along the Potomac River, and create an aesthetic entryway into the District. The 25-mile parkway, administered by the NPS, runs along the Potomac River from the Mount Vernon Estate to Great Falls, Virginia. The Mount Vernon Memorial Highway (MVMH) is the original 15.2-mile segment of the GWMP commemorating the birth of George Washington.

- **Mount Vernon Trail (MVT)** – The MVT is an 18-mile paved trail for pedestrians and bicyclists that runs between George Washington's Mount Vernon Estate and Theodore Roosevelt Island and parallels the GWMP for its entire length. The MVT is a recreational resource within the park, however, it is not currently a contributing resource to the GWMP or MVMH Historic Districts.

- **East Potomac Park (EPP)** - East Potomac Park is one of the largest recreational spaces in the Washington, DC, core, occupying most of Hains Point between the Washington Channel and the Potomac River. It is almost 330 acres in size and extends southeast of West Potomac Park. East Potomac Park has been primarily developed for active recreation uses. The park currently contains a golf course with food service, one of the country's oldest miniature golf courses, a swimming pool, and a tennis facility. The area's roads are well used by bicyclists. Visitor services also include picnic facilities, restrooms, and a playground.

- **Hancock Park** - approximately 1.11-acre located between the existing railroad tracks, northeast of the LE Interlocking, west of 7th Street SW, south of Maryland Avenue SW, and east of the 9th Street SW Expressway. HP contains open space, walkways, landscaping and screening, and café tables and chairs.

Alternative A would require the permanent use of up to .5 acres for the new bridge structure along the western side of the exiting Long Bridge and approximately .62 acres from the new bicycle/pedestrian bridge. The new railroad bridge would pass over the MVT and GWMP roadway and would permanently occupy a portion of the vegetated area between the trail and the roadway, with 15-20 foot high retaining walls. Construction of the new bridge would result in removal of approximately 70 trees, including three larger trees with greater than 34-inch trunk diameters. Some of these trees date to the 1932 planting plan of the GWMP and were intended to visually screen the railroad bridge from the motorway. Temporary use of up to 3.8 acres of NPS-administered land from the GWMP and MVMH for construction access and staging.

Alternative A would require the permanent use of up to 2.75 acres for retaining walls, abutments, and bridges through the park and approximately .31 acres from the new bicycle/pedestrian from NPS property from EPP and WPP. The new railroad bridge would pass over East Ohio Drive and the two new tracks would require widening of the existing railroad embankment, affecting approximately 2.4 acres of the park. The widened railroad right-of-way would also permanently occupy a portion of NPS Parking Lot C, causing the permanent loss of up to 50 parking spaces. Construction staging areas and widening of the embankment would require removal of approximately 170 trees, including eight larger trees with greater than 34-inch trunk diameters and up to four Japanese cherry blossom plantings. The majority of the trees removed (150) would be small saplings under 12-inch trunk diameters that screen the railroad tracks. Temporary use of up to 5.7 acres of NPS property from EPP and WPP for construction access and staging.

FRA has determined that the use of Hancock Park is *de minimis*. The temporary use is for construction access and staging. The NPS does not concur with this finding as a third of this very small park will be unavailable for use by the public for a duration of three years. The NPS considered this a temporary use under Section 4(f).

The Department agrees with the statements in both the DEIS and Draft Section 4(f) Evaluation that the Project would result in a determination of “adverse effect” under Section 106 National Historical Preservation Act (Section 106) to GWMP, MVMH, EPP and WPP historic resources. The removal of contributing vegetation, especially mature trees that date to the GWMP’s 1932 planting plan and were intended to screen the railroad bridge from motorists, and the introduction of highly visible major infrastructure would diminish the historic integrity (specifically, the contributing vegetation), and inherent feeling of both the GWMP and MVMH. Action Alternative A would have an adverse effect on East and West Potomac Parks Historic District through incorporation of parkland and removal of up to four contributing Japanese cherry blossom plantings, which would diminish the integrity of setting, design, materials, and feeling of the park. Addition of the new bridge would also obstruct views of the existing Long Bridge from the north, diminishing the visual integrity of the contributing structure and resulting in an adverse effect. Due to a determination of adverse effect, NPS has been participating as a consulting party in the development of a Programmatic Agreement which is being prepared in consultation with the DC State Historic Preservation Office and other consulting parties.

With regard to the draft Section 4(f), the Department understands no feasible and prudent alternatives that avoid the use of Section 4(f) properties were identified and that the action alternatives evaluated have somewhat equal impacts to Section 4(f) properties. The draft Section 4(f) Evaluation does not make a determination regarding prudent and feasible, as defined in 23 CFR 774.17. Document states that FRA will complete the Final Section 4(f) Evaluation at the same time as the FEIS for the Project. It will include a determination of the impacts to Section 4(f) properties resulting from the Preferred Alternative and documentation of measures to minimize harm. As a result, the Department is not likely to concur at this time. The Department will require more information regarding alternatives, mitigation and minimization as well as FRA determination of prudent and feasible. Implementation of the bicycle/pedestrian bridge is an element that would be a benefit to the NPS properties being impacted and would enhance access and connectivity to and through NPS properties.

Finally, the Department understands the need to provide additional long-term railroad capacity and improve the overall reliability of railroad services and understands the rationale for expanded capacity to occur within this corridor. However, we also understand the major significant impacts the project will have on NPS property, visitor use, access, and experience, impacts to additional Section 4(f) resources and that the disruption during construction will last between four and five years. The Department remains concerned with significant impacts to NPS resources and looks forward to the continued collaboration with FRA, DDOT, and DPRT during this long-term planning process to continue to mitigate and minimize these impacts.

If you have any questions or concerns regarding these comments, please contact Tammy Stidham, Deputy Associate Area Director - Lands and Planning at 1100 Ohio Drive SW, Washington DC, 20242. Ms. Stidham can be reached by phone at (202) 619-7474 or email Tammy_Stidham@nps.gov.

The Department appreciates the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Lindy Nelson", with a long horizontal flourish extending to the right.

Lindy Nelson
Regional Environmental Officer

cc: Tammy Stidham, NPS

Farmer, Lee

From: Susan Stafford - LongBridgeProject.com <susan.stafford@faa.gov>
Sent: Monday, October 28, 2019 8:13 AM
To: info@longbridgeproject.com
Subject: [External] Long Bridge DEIS

Name: Susan Stafford
Email: susan.stafford@faa.gov

Subject: Long Bridge DEIS

Message: Thank you for the opportunity to review and comment on the Long Bridge DEIS. The FAA has no comments other than to reiterate, as acknowledged in the DEIS, that Form 7460-1 Notice of Proposed Construction or Alteration must be filed with the FAA as required by Title 14 of the Code of Federal Regulations (14 CFR Part 77.9). This requirement is based on the project's proximity and unknown height of project elements, including construction equipment, to Ronald Reagan Washington National Airport (DCA). Notice should be filed using the FAA's Obstruction Evaluation / Airport Airspace Analysis (OE/AAA) web portal at <https://nam04.safelinks.protection.outlook.com/?url=www.oeaaa.faa.gov&data=02%7C01%7C1farmer%40vnb.com%7C1afdd07e194e45d0276308d75ba0244c%7C365c5e99f68f4beb89d9abecb41b1a1b%7C0%7C1%7C637078615696164395&sdata=tQ9a0V0nYZ%2FrDf130Ce1FLCaJFvV06R8UaspL%2BV82OI%3D&reserved=0>.

Sent from the contact form at longbridgeproject.com

IN REPLY REFER TO:
NCPC FILE No. 7819

October 24, 2019

Ms. Anna Chamberlin, AICP
55 M Street SE, Suite 400
Washington, DC, 20003-3515

Re: Long Bridge Project – Draft Environmental Impact Statement Comments

Dear Ms. Chamberlin:

Thank you for the opportunity to comment on the draft Environmental Impact Statement (DEIS) through our Cooperating Agency role in the Long Bridge project. We offer the following guidance to assist the Federal Railroad Administration (FRA) and District Department of Transportation (DDOT) in developing a final EIS that would enable NCPC review of all potential project-related land transfers and federal property improvements. Our Commission will rely on the EIS and Record of Decision (ROD) to satisfy its compliance requirements under the National Environmental Policy Act.

Future Property Transfers

The DEIS references NCPC’s review authority over potential federal land transfers, with several locations described in the Environmental Consequences Report (Appendix D3), Scoping Report (A1), and Property and Land Use (12) chapter. The final EIS should provide more detail pertaining to transfer area size, location, impervious area change, tree removal, visual impact, and proposed mitigation. Additionally, the Record of Decision should contain a separate land transfer section to help facilitate NCPC review.

Memorials and Museums Master Plan (2M Plan) – Prime Candidate Site # 13

The DEIS concludes that a nearby potential East Potomac Park memorial site (#13), identified by the NCPC Memorials and Museums Master Plan (2M Plan), is “not incompatible” with the preferred alternative. Both action alternatives would construct new tracks along the northside (opposite side from Site # 13) of the existing railway alignment. DDOT should ensure that the site’s functionality as a future commemorative use is preserved once potential railway improvements are complete.

Ms. Anna Chamberlin, AICP
Page Two

New Pedestrian/Bicycle Bridge Connection

NCPC supports a new pedestrian/bicycle bridge across the Potomac River as important 4(f) mitigation for potential Long Bridge project improvements. The DEIS describes the benefit of such a crossing as improving connectivity between Long Bridge Park, George Washington Memorial Parkway, Mount

Vernon Trail, and East Potomac Park. Pedestrians and bicyclists would be able to cross the Potomac River without the inconvenience and discomfort of traveling alongside motorized traffic as under current conditions. Though the new bridge is not funded at this time, NCPC supports bridge funding in conjunction with future Long Bridge-related improvements, with future design to be development in coordination with NPS, Arlington County, and other important stakeholders.

Project Setting

As noted in the DEIS, Long Bridge is in a visible area, spanning between George Washington Memorial Parkway and East Potomac Park, near the Jefferson Memorial, within several significant/gateway view-sheds. NCPC seeks to preserve the sensitive nature of the study area setting as articulated through Commission policies from the Urban Design Element and its accompanying Technical Addendum. We encourage DDOT and other study stakeholders to identify appropriate project mitigation including screening/softening vegetation and exploring multiple steel bridge girder and pier façade treatments as the study process continues. In particular, selecting natural paint tones and/or stone façade materials may harmonize the existing and/or new bridge spans with the surrounding natural landscape and complement existing or adjacent bridge structures. The final EIS and ROD should include specific mitigation proposals such as these.

National Park Service Property Impacts

NCPC encourages continued coordination between DDOT and the National Park Service (NPS) to effectively mitigate anticipated visitor use, access, experience, and Section 4(f) resource impacts to NPS property. We note that all potential affected federal property is under NPS jurisdiction. Project mitigation should be commensurate with the amount of property needed temporarily for construction and permanently over the long-term, and the expected removal of trees.

Ms. Anna Chamberlin, AICP
Page Three

We appreciate the opportunity to provide comments and we look forward to our continued involvement in the NEPA process. If you have any questions regarding our comments, please contact Michael Weil at 202.482.7253 or michael.weil@ncpc.gov.

Sincerely,

Diane Sullivan 10/24/19

Diane Sullivan, Director
Urban Design and Plan Review Division

cc: Anna Chamberlain, DDOT
Frederick Lindstrom, US Commission of Fine Arts
Peter May, National Park Service
Andrew Lewis, District of Columbia State Historic Preservation Office



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
GREATER ATLANTIC REGIONAL FISHERIES OFFICE
55 Great Republic Drive
Gloucester, MA 01930-2276

OCT 21 2019

Anna Chamberlin, AICP
Long Bridge Project
55 M Street, SE, Suite 400
Washington, DC 20003-3515

Re: Long Bridge Project Draft Environmental Impact Statement (DEIS)

Dear Ms. Chamberlin:

Thank you for providing us with your Draft Environmental Impact Statement (DEIS) on September 5, 2019, prepared by the Federal Railroad Administration (FRA) and the District Department of Transportation (DDOT), and for your early coordination with the Cooperating and Participating agencies on the Long Bridge Project. The Proposed Action consists of potential improvements to Long Bridge and related railroad infrastructure between RO Interlocking in Arlington, Virginia, and L'Enfant (LE) Interlocking near 10th Street SW in the District (the Project Area).

Action Alternative A (the Preferred Alternative) would construct a new two-track railroad bridge over the Potomac River and the George Washington Memorial Parkway (GWMP) between the existing railroad bridge and the Metrorail Bridge. It would expand the Long Bridge Corridor from two to four tracks, including all necessary infrastructure improvements from RO Interlocking through LE Interlocking. This alternative would retain the existing Long Bridge over the Potomac River as well as the railroad bridge over the GWMP. Action Alternative B would construct a new two-track railroad bridge over the Potomac River and the GWMP between the existing railroad bridge and the Metrorail Bridge and would replace the existing Long Bridge and the railroad bridge over the GWMP rather than keeping those bridges.

FRA and DDOT identified an independent bike-pedestrian crossing as proposed Section 4(f) mitigation. This crossing would be on an independent bridge between the new railroad bridge and the Metrorail bridge. It would begin in Long Bridge Park; cross over the GWMP, Mount Vernon Trail (MVT), Potomac River, and Ohio Drive SW; and end in the NPS Parking Lot C in East Potomac Park. Ramps would connect the crossing with a path just north of the new Long Bridge Park Aquatic Center, the MVT, and East Potomac Park.

Constructing structures over the Potomac River and Washington Channel would require barges to store and assemble materials, to deliver labor and equipment, and to support various construction activities. Crews would place barges at each pier for construction purposes as well as downstream for staging. The construction of temporary finger piers on each shore would allow crews to receive materials and equipment from the barges. Crews would erect superstructures over water with cranes on barges. Construction of the piers and some abutments would require watertight enclosures, which would involve excavating the river bottom.



For the assessment of impacts to submerged aquatic vegetation (SAV) in the Potomac River, the EIS considers a distance approximately 2,000 feet upstream and downstream of the Project footprint to address the potential for scour and deposition to SAV beds. Available data (2013-2017) obtained from the Virginia Institute of Marine Science (VIMS) show that SAV beds are present in Roaches Run within the southern portion of the SAV Local Study Area and along the north shoreline of the Potomac River immediately upstream from Long Bridge. Both alternatives would have the same impacts on SAV:

- The new upstream bridge would result in one pier encroaching into a SAV bed found along the northern shore of the Potomac River, resulting in the loss of 1,750 square feet associated with the 70-foot by 25-foot cofferdam construction of the pier structure.
- Shading caused by the new deck may have permanent impacts to 1,900 square feet of SAV.
- Scour and deposition from installing the crossing piers may result in impacts to downstream SAV beds in the Potomac River.
- The temporary barge pier located along the northern shoreline of the Potomac River just upstream from Long Bridge for approximately five years during construction would result in the loss of approximately 7,851 square feet of SAV.

Construction of the new upstream bridge includes the installation of 22 piers in the Potomac River and replacing one pier in the Washington Channel/Tidal Impoundment with a larger pier, totaling 7,392 square feet (0.2 acre) and 1,115 square feet (<0.1 acre) of disturbed benthic habitat, respectively. Temporary finger piers and a spud barge would be necessary for construction. The construction of each pier would involve installation of sheet piles to create enclosed cofferdams that would be dewatered. Temporary habitat loss from construction of the new upstream bridge would total 31,358 square feet (approximately 0.7 acres) in the Potomac River and 1,635 square feet (<0.1 acre) in 514 the Washington Channel/Tidal Impoundment. Alternative B would result in additional impacts from demolishing the existing bridge and construction of the new bridge.

Proposed minimization and mitigation:

- Erosion control and stormwater management measures would be used during construction to reduce disturbance to wetland vegetation and SAV from erosive forces, such as stormwater runoff.
- Silt curtains would be used to contain suspended sediments and minimize impacts to SAV.
- The construction contractor would be advised of SAV locations and required to avoid boat traffic within shallow water areas where SAV could be damaged by boat motor propellers.
- New piers would be lined up with existing piers to minimize potential impacts to SAV by decreasing the number and footprint of new piers within areas that SAV could occupy in the future. Eliminating the downstream bridge alignments from consideration prevented encroaching on Roaches Run. Additional coordination at RO Interlocking resulted in the elimination of a culvert extension into Roaches Run and avoided additional impacts to SAV.

- Work would be conducted behind dewatered cofferdams.
- If an impact hammer is used to install piles, noise attenuating methods would be used to reduce noise levels to below injury or behavioral modification thresholds for fish.
- Time of year restrictions would be required for in-stream construction to avoid impacting migratory fish species.

Anadromous fish

The proposed project is located above the estuarine mixing zone in tidal fresh water and is not designated as essential fish habitat (EFH) for federally managed species. However, as you describe in your EIS, anadromous species have been documented as spawning near and/or migrating through the study area, including: blueback herring (*Alosa aestivalis*), hickory shad (*Alosa mediocris*), alewife (*Alosa pseudoharengus*), American shad (*Alosa sapidissima*), and striped bass (*Morone saxatilis*). We generally recommend that in-water construction activities that could impact the migration or spawning of these species be avoided from February 15 through June 15. We recognize that multiple, overlapping time of year restrictions make construction timelines difficult, and we will be happy to work with you and the permitting agencies to develop a timeline of what activities would be restricted at what times of year to assist in planning purposes.

Submerged Aquatic Vegetation (SAV)

SAV and their associated epiphytes are highly productive, produce a structural matrix on which many other species depend, improve water quality and stabilize sediments. Seagrasses are among the most productive ecosystems in the world and perform a number of irreplaceable ecological functions which range from chemical cycling and physical modification of the water column and sediments to providing food and shelter for commercial, recreational, as well as economically important organisms.

The U.S. Environmental Protection Agency has designated SAV as a special aquatic site under Section 404(b)(1) of the federal Clean Water Act, due to its important role in the marine ecosystem for nesting, spawning, nursery cover, and forage areas for fish and wildlife, and SAV is a priority habitat for NOAA.

You state in the EIS that SAV impacted by the temporary construction pier would likely return after removal of the pier. Given that the construction pier would be in place for more than five years, it is possible that SAV would not rebound post-removal. As a result, these impacts should be considered permanent and you should provide compensatory mitigation to offset the loss. Because of the ecological value of SAV, we recommend that if impacts cannot be avoided that in-kind mitigation be undertaken unless it can be demonstrated that the planting of SAV is not practicable. We typically recommend an in-kind compensation ratio for SAV impacts of 3:1.

Recommendations

Compensatory mitigation should be provided for the loss of open water habitat resulting from installation of permanent bridge piers and for the temporary and permanent losses of SAV.

Because there is successful SAV in the area now, and you will not be changing the depth or sediment type in the project area, we recommend that after removing the construction pier you:

- (1) allow the sediment to settle;
- (2) re-plant the area for the following growing season to restore existing conditions;
- (3) mitigate for the temporal loss of SAV habitat by planting additional SAV at a 3:1 ratio, preferably in locations where SAV has been successful in the past but has disappeared or has minimal density; and
- (4) monitor the entire project site for five years to determine if there are additional SAV losses resulting from the proposed project that require mitigation and to determine the success of re-planting. If SAV growth has not been documented by year three, a second round of planting may be necessary.

We appreciate the efforts you have made to avoid and minimize impacts early in the planning of your proposed project, and the efforts that you have made to coordinate with the regulatory and resource agencies. We look forward to continued coordination on this project as it moves forward. If you have questions or would like to discuss this further, please contact Kristy Beard at kristy.beard@noaa.gov

Sincerely,



Karen Greene
Mid-Atlantic Field Offices Supervisor
Habitat Conservation Division

Cc: Anderson (ACOE)
Hopper (NMFS PRD)



COUNCIL OF THE DISTRICT OF COLUMBIA
1350 PENNSYLVANIA AVENUE, N.W., SUITE 408
WASHINGTON, D.C. 20004

Elissa Silverman
Councilmember, At-Large
Chair, Committee on Labor and Workforce Development

Office: (202) 724-7772
Fax: (202) 724-8087
esilverman@dccouncil.us

October 28, 2019

District Department of Transportation
Anna Chamberlin, AICP
55 M Street S.E.
Washington, D.C. 20003

Dear Ms. Chamberlin,

As a cyclist and frequent commuter to Arlington County, I write to express my strong support for the bike-pedestrian crossing mitigation measures for the Long Bridge Project. The impact of the Metropolitan Branch Trail in the District has been invaluable, and a bike-pedestrian crossing to connect the District of Columbia with the Commonwealth of Virginia would be an enormous advancement for residents in both jurisdictions.

Expanding our regional connectivity by supporting multimodal forms of transit is one of the best ways to increase access to parks and open spaces, improve personal mobility, support an active transportation network and improve public health. It also builds upon our jurisdictions' shared commitments to transportation equity and environmental protection.


I hope the bike-pedestrian crossing will remain part of the Long Bridge Project and be completed contemporaneously. This is a once-in-a-generation opportunity to improve the connectivity between our jurisdictions, and I look forward to continuing to be a partner in advancing the District and Virginia's shared transportation goals as the project moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Elissa Silverman".

Elissa Silverman
D.C. Councilmember, At-Large

TO: Anna Chamberlain, Long Bridge Project Manager

FROM: Tommy Wells, Director of the Department of Energy and Environment 

DATE: October 28, 2019

SUBJECT: Department of Energy and Environment Comments on Long Bridge Project

The Department of Energy and Environment (DOEE) appreciates the opportunity to provide input on the Long Bridge Project, specifically the bike-pedestrian component of the project. DOEE is very supportive of the proposed bike-pedestrian crossing and strongly prefers that the crossing remain in the final project plan. The bike-pedestrian crossing would align with important goals and targets within the District of Columbia's sustainability plan known as [Sustainable DC 2.0](#), as well as support the goals of the District's comprehensive energy plan/climate action plan, [Clean Energy DC](#).

The proposed crossing would directly support several Sustainable DC transportation goals:

- Expand safe, connected infrastructure for pedestrians and cyclists (Transportation Goal 2),
- Enhance affordable, convenient transportation options to reduce dependency on single occupant vehicles (Transportation Goal 3), and
- Reduce greenhouse gas emissions and air pollution from the transportation sector (Transportation Goal 4).

The crossing would also directly support Transportation action 2.1: "Develop and maintain a safe and convenient citywide bicycle land and trail network," something which was broadly supported and emphasized during plan development. In addition to transportation, the bike-pedestrian crossing would support Health Action 1.2: "Prioritize community-driven strategies to support physical activity in unexpected but everyday spaces." Encouraging commuting by foot or bicycle can help achieve that goal, as does increasing "transit walking," the steps taken to and from public transit. *Research from the American Journal of Public Health* (Freeland, 2013) and the *International Journal Environmental Research and Public Health* (Nissel et al, 2012), as well as numerous other studies, have shown that increasing access to frequent public transit can also increase physical activity through transit walking.

Finally, the crossing would support Clean Energy DC's call for cleaner transportation: "large reductions in GHG emissions from the transportation sector will be needed to meet the District's GHG reduction targets. This means changing the way District residents move around

the city by increasing the use of public transit, biking, and walking.” In fact, the Clean Energy DC Plan modeled a 9.6% GHG reduction by 2032 would come from shifting transportation mode share to walking, biking, and mass transit. This project would directly support that goal.

In summary, DOEE strongly supports the bike-pedestrian crossing component of the Long Bridge project and firmly believes the crossing would directly support several of the District’s long-term sustainability and climate goals.

Long Bridge Project (Project)
Draft Environmental Impact Statement and Draft Section 4(f) Evaluation
Review Comments by DC Water

The purpose of the Project is to provide additional railroad capacity. The corridor spans between the RO interlocking in Arlington, VA and L'Enfant interlocking near 10th St SW in Washington, DC.

The Draft EIS includes three alternatives:

1. No Action Alternative
2. Action Alternative A: includes construction of a new two-track bridge over the GWMP and the Potomac River, two new two-track bridges over I-395, and a new four-track bridge over Ohio Drive SW, the Washington Channel and Maine Ave SW.
3. Action Alternative B: includes construction of two new two-track bridges over the GWMP (replace existing bridge), a new two-track bridge and replace existing Long Bridge with new two-track bridge over the Potomac River, two new two-track bridges over I-395, and a new four-track bridge over Ohio Drive SW, the Washington Channel and Maine Ave SW.

Potential impacts on DC Water's water infrastructure assuming Action Alternative A or B is implemented:

1. The Long Bridge Project team shall be aware of water mains along the corridor and within the footprint of the Project that will likely be affected by the construction of the Long Bridge. These include but are not limited to:
 - a. 12-inch water main along Maine Ave SW - will potentially be affected as the Project intends to expand the current two-track bridge to a four-track bridge over Maine Ave SW.
 - b. Other 8-inch and 12-inch water mains that run parallel or perpendicular to the existing tracks along Maryland Ave SW - these mains, either underground or hanging from existing bridges, will likely be affected by construction activities.
 - c. 20-inch water main along the 12th St Expy - will likely be affected by construction activities.
2. To avoid / minimize potential disruption of water service due to construction activities associated with the expansion of Long Bridge, DDOT and FRA shall engage DC Water in the review process of the design documents.

Water utilities along the Corridor may need to be relocated such that existing water utilities are not compromised and service to the customers is not disrupted. FRA and DDOT shall be responsible for the relocation, protection and water service continuity during the length of the Project. The Project team is responsible for obtaining the latest information on all DC Water' assets that may be affected by the Project. This assessment does not provide an analysis of the potential construction impacts to the water infrastructure as construction details for the Long Bridge have not been provided. In addition, this review does not evaluate the impact of increased water demands associated to the Long Bridge Project as the environmental impact assessment document does not provide information on water demand requirements.

Potential impacts on DC Water's existing and proposed sewer infrastructure assuming Action Alternative A or B is implemented:

1. DC Water currently operates and maintains critical sewer infrastructure in the Long Bridge Project area, particularly the Potomac Force Mains. These parallel 6-foot and 8-foot diameter pipelines, constructed in the 1960s, serve a large number of customers in the western portion of the District

of Columbia, as well as suburban customers in Montgomery County, Maryland, and Fairfax and Loudoun Counties, Virginia. The pipelines run roughly parallel along the western shoreline of East and West Potomac Park. The Project team is responsible for ensuring sufficient pre-construction evaluation and protection during construction to ensure the Project does not damage these critical pipelines.

2. Other existing sewer infrastructure is also present throughout the Corridor. FRA and DDOT shall be responsible for the relocation and/or protection of sewer infrastructure during the Project. The Project team is responsible for obtaining the latest information on all DC Water assets that may be affected by the Project. This assessment does not provide an analysis of the potential construction impacts to the sewer infrastructure as construction details for the Long Bridge have not been provided.
3. DC Water is in the process of implementing its Combined Sewer System Long Term Control Plan (LTCP), also known as the DC Clean Rivers Project. The purpose of this project is to control combined sewer overflows (CSOs) into the District's waterways, which occur when the existing combined sewer system's capacity is exceeded during storm events. The project is required by the 2005 Federal Consent Decree entered into by DC Water, the District of Columbia, the U.S. Department of Justice, and the U.S. Environmental Protection Agency, as modified in January 2016. The Potomac River Tunnel (PRT) Project, currently in the planning phase, is the portion of the DC Clean Rivers Project which will provide control for CSOs along the Potomac River. The PRT will consist of a storage/conveyance tunnel and supporting infrastructure, including diversion facilities connecting to existing sewers, drop shafts, overflow structures, and ventilation control facilities. DC Water, in conjunction with the National Park Service, has completed an Environmental Assessment for the PRT project.

The PRT will convey flows captured from the Potomac River CSOs via gravity to the existing Blue Plains Tunnel and Blue Plains Advanced Wastewater Treatment Plant, generally via an alignment parallel to the eastern shoreline of the Potomac River. In the vicinity of the 14th Street Bridges (including the Long Bridge), the PRT must avoid the deep foundations of each of the five existing bridges. Based on review of record drawings provided by each of the bridge owners, Figure 1 shows the current planned alignment of the PRT as it passes through the Corridor. Figure 2 shows a cross section showing of the planned PRT alignment relative to the existing Long Bridge deep foundations based on drawings provided by CSX in April 2015. The Long Bridge Project EIS and subsequent design should consider how any proposed foundations will be coordinated with the PRT alignment, potentially including providing piers and piles aligned with those beneath the existing bridges upstream. This includes the bike-pedestrian crossing. The proposed Long Bridge Project and bike-pedestrian crossing alternatives presented in the EIS warrant close and early technical coordination with DC Water to determine any possible impacts as both projects continue into design.

General comments for the Long Bridge project assuming Action Alternative A or B is implemented:

1. In addition to the relocation and/or protection of DC Water assets, this project needs to ensure DC Water has full access to the DC Water assets during and after construction.
2. The proposed Long Bridge Project and bike-pedestrian crossing alternatives presented in the EIS warrant close and early technical coordination with DC Water as the project continues into design to determine any possible impacts to DC Water assets.

3. Please provide the project schedule for better coordination with DC Water's future CIP projects in the project area.

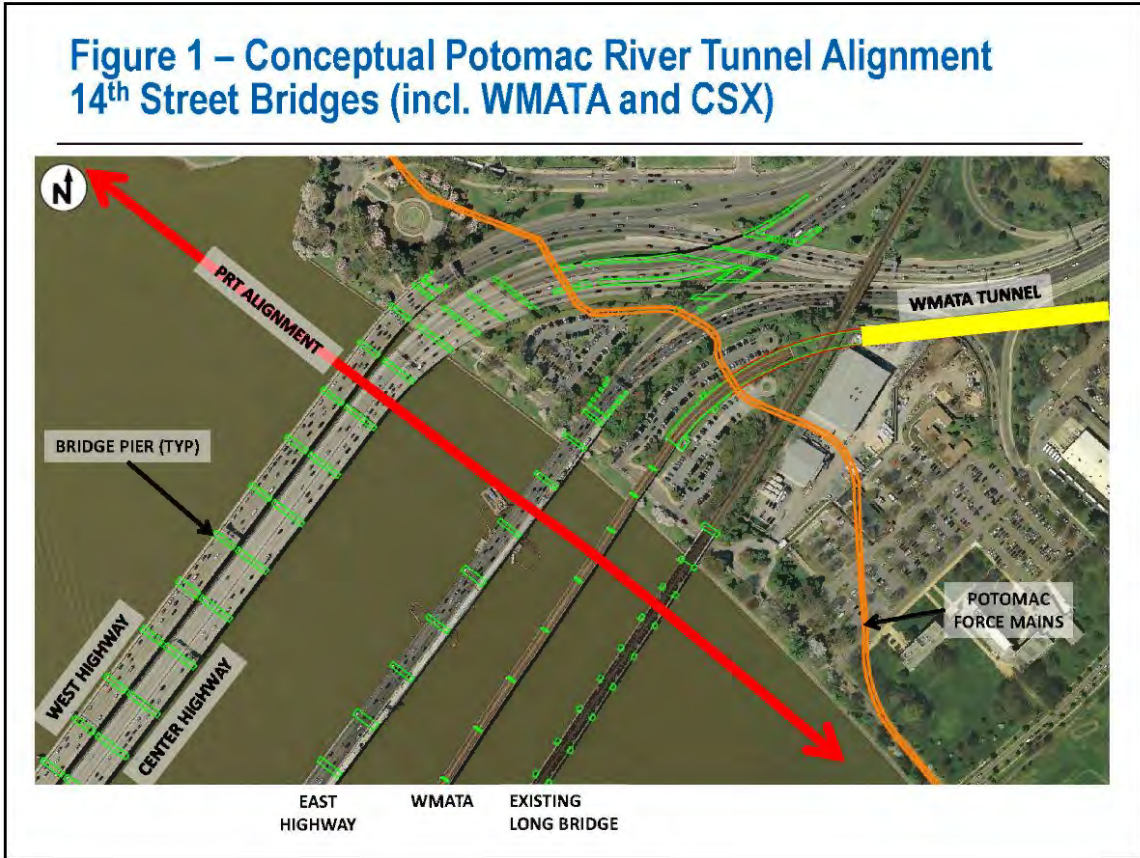
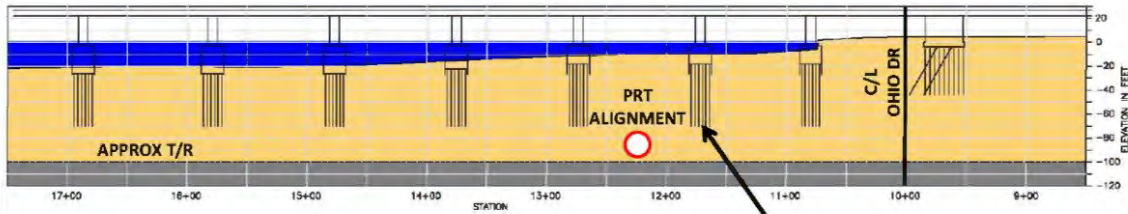
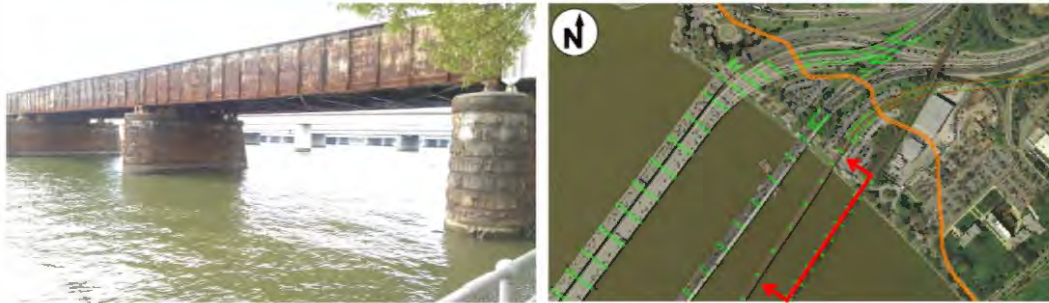


Figure 2 – Conceptual Tunnel Cross Section Long Bridge Crossing



- Original bridge dates back to c. 1809
- Has been rebuilt/multiple times; other piers may exist

STEEL/TIMBER PILES (TYP)
TIP ELEV UNKNOW



October 4, 2019

Chairman
Hon. Matthew F. Letourneau

Vice Chairman
Hon. Katie Cristol

Secretary/Treasurer
Hon. Sharon Bulova

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Hon. Elizabeth B. Bennett-Parker

Arlington County
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Hon. Christian Dorsey
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Hon. John W. Foust
Hon. Catherine M. Hudgins
Hon. Jeffrey C. McKay

City of Fairfax
Hon. David Meyer

City of Falls Church
Hon. David F. Snyder

Loudoun County
Hon. Matthew F. Letourneau
Hon. Ron A. Meyer

Commonwealth of Virginia
Hon. Paul C. Smedberg

Virginia General Assembly

Senate
Sen. Richard H. Black
Sen. Adam Ebbin

House of Delegates
Del. David LaRock
Hon. James M. LeMunyon
Mr. M. David Skiles
Mr. Raul "Danny" Vargas

Executive Director
Katherine A. Maltice

Ms. Anna Chamberlin
Long Bridge Project
55 M Street SE, Suite 400
Washington, DC 20003

RE: Long Bridge Draft Environmental Impact Statement

Dear Ms. Chamberlin:

On behalf of the Northern Transportation Commission (NVTC), I am writing to endorse the Long Bridge Draft Environmental Impact Statement (DEIS) identification of **Action Alternative A** as the preferred alternative. NVTC is the regional transit Commission for Northern Virginia and the co-owner of the Virginia Railway Express (VRE) commuter rail.

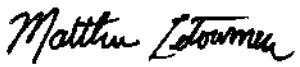
On September 5, 2019, the District Department of Transportation (DDOT) and the Federal Railroad Administration (FRA) released the Draft Environmental Impact Statement as part of the National Environmental Policy Act (NEPA) process of evaluating potential environmental and human impacts of the Long Bridge Project alternatives. In this document, the Long Bridge preferred alternative, Action Alternative A, will fulfill the purpose and need of the Long Bridge project to expand capacity of rail services and the regional transportation network while minimizing costs, construction time and impacts to surrounding area.

Construction of a new, two-track bridge would also align with station and rail infrastructure improvements by the Commonwealth of Virginia and VRE to enhance rail system capacity at L'Enfant Plaza, Crystal City and along the I-95 corridor designed to expand the number of commuter and intercity trains by 2040. Furthermore, the parallel bridge configuration proposed under Action Alternative A would reduce disruption to ongoing VRE services and adjacent transportation links during construction, which are essential to the mobility of Northern Virginia and the region.

NVTC strongly supports the Long Bridge Project to expand commuter rail service, to improve intercity connections throughout the Commonwealth to Northern Virginia, to enhance economic connectivity of the region as well as to provide a vital multimodal link across the Potomac River. This project is consistent with VRE's System Plan and with the Commission's strategic goals to increase the capacity of our regional transit network.

We appreciate the opportunity to provide comment on the draft environmental impact statement and look forward to issuance of the Final Environmental Impact Statement and Record of Decision.

Best regards,

A handwritten signature in black ink that reads "Matthew Letourneau". The signature is written in a cursive style with a large initial 'M' and a long, sweeping underline.

Matthew F. Letourneau
Chairman



October 3, 2019

Ms. Anna Chamberlin
Long Bridge Project
55 M Street SE, Suite 400
Washington, DC 20003

RE: Long Bridge Draft Environmental Impact Statement

Dear Ms. Chamberlin:

On behalf of the Potomac and Rappahannock Transportation Commission (PRTC), I am writing to you to support the Long Bridge Draft Environmental Impact Statement (DEIS) identification of **Action Alternative A** as the preferred alternative. PRTC is a regional transit Commission comprised of the Counties of Prince William, Stafford, Spotsylvania, and the Cities of Fredericksburg, Manassas, and Manassas Park and the co-owner of the Virginia Railway Express (VRE) commuter rail.

On September 5, 2019, the District Department of Transportation (DDOT) and the Federal Railroad Administration (FRA) released the Draft Environmental Impact Statement as part of the National Environmental Policy Act (NEPA) process of evaluating potential environmental and human impacts of the Long Bridge Project alternatives. In this document, the Long Bridge preferred alternative, **Action Alternative A**, will fulfill the purpose and need of the Long Bridge project to expand capacity of rail services and the regional transportation network while minimizing costs, construction time and impacts to the surrounding area.

Construction of a new, two-track bridge would also align with station and rail infrastructure improvements by the Commonwealth of Virginia and VRE to enhance rail system capacity at L'Enfant Plaza, Crystal City and along the I-95 corridor designed to expand the number of commuter and intercity trains by 2040. Furthermore, the parallel bridge configuration proposed under **Action Alternative A** would reduce disruption to ongoing VRE services and adjacent transportation links during construction, which are essential to the mobility of Northern Virginia and the region.

PRTC strongly supports the Long Bridge Project to expand commuter rail service, to improve intercity connections throughout the Commonwealth to Northern Virginia, to enhance economic connectivity of the region as well as to provide a vital multimodal link across the Potomac River. This project is consistent with VRE's System Plan and with the Commission's strategic goals to increase the capacity of our regional transit network.

We appreciate the opportunity to provide comment on the draft environmental impact statement and look forward to issuance of the Final Environmental Impact Statement and Record of Decision.

Best regards,

A handwritten signature in black ink that reads "Ruth Anderson". The signature is written in a cursive style with a large initial "R" and a distinct "A".

Ruth Anderson
Chair

October 28, 2019

Via ELECTRONIC MAIL

Ms. Anna Chamberlin, AICP, Manager, Project Review
District Department of Transportation, Planning and Sustainability Division
55 M Street SE, Suite 400
Washington, DC 20003
anna.chamberlin@dc.gov

Re: Long Bridge Project Draft Environmental Impact Statement (DEIS), Draft Section 4(f) Evaluation, and Draft Section 106 Programmatic Agreement

Dear Ms. Chamberlin:

I am writing on behalf of the Virginia Railway Express (VRE), a joint project of the Northern Virginia Transportation Commission and the Potomac and Rappahannock Transportation Commission.

VRE's continues to advocate for improved railroad capacity enhancements at Long Bridge. As the largest current and prospective railroad user of Long Bridge, we support the Preferred Alternative, Action Alternative A, a new two-track bridge upstream of the existing bridge while retaining the existing bridge. We also support the proposed Section 4(f) mitigation, including the potential construction of a new, bike-pedestrian shared use path beginning at Long Bridge Park in Virginia, bridging over the George Washington Memorial Parkway and the Potomac River to East Potomac Park, and connecting to Ohio Drive SW in the District. The construction of a separate bridge structure for this proposed connection mitigates the safety and security concerns previously noted by VRE regarding the need to maintain separation between trains and people to reduce the threat of damage or injuries.

Thank you for the opportunity to comment on this important transportation infrastructure project. VRE looks forward to continuing to collaborate with all our partners and stakeholders as the Long Bridge Project is implemented.

Sincerely,



Rich Dalton
Deputy CEO and Chief Operating Officer
Virginia Railway Express

cc: Mike McLaughlin, DRPT
Oscar Gonzalez, VRE
David Valenstein, FRA

October 25, 2019

Anna Chamberlin, AICP
Long Bridge Project
55 M Street, SE, Suite 400
Washington, DC 20003



RE: Long Bridge Project Draft Environmental Impact Statement

Dear Ms. Chamberlin,

The Washington Metropolitan Area Transit Authority (WMATA) appreciates the opportunity to comment on the Draft Environmental Impact Statement for the Long Bridge Project.

About WMATA

The Metro system operated by WMATA provides safe, clean and reliable transit service to five million people across the National Capital Region, covering 1,500 square miles of Maryland, Virginia and the District of Columbia. WMATA operates the third largest heavy rail transit (subway) service, the sixth largest bus network and the fifth largest paratransit service in the United States:

- Metrorail operates more than 1,100 heavy rail cars over 118 miles of track serving six train lines and 91 accessible rail stations;
- Metrobus operates more than 1,600 buses, which are all accessible to people with disabilities, serving more than 10,600 bus stops, and;
- MetroAccess provides around 2.4 million annual door-to-door paratransit trips for customers with disabilities who are unable to use Metrorail, Metrobus and local bus services for some or all of their trips.

Comments

WMATA appreciated the opportunity to meet with project staff earlier in the project. We encourage the District Department of Transportation and the Federal Railroad Administration to select the alternative that is least disruptive to our operations, as discussed during the meeting and below.

Construction activities over, under, or adjacent to the WMATA right-of-way, including the Yellow Line portal located on the east side of the Potomac River, must be coordinated with our Office of Real Estate and Parking and with our Office of Joint Development and Adjacent Construction. Ms. Anabela Talaia of the Office of Real Estate and Parking can be reached at (202) 962-1588 or by email at atalaia@wmata.com.

Projects adjacent to WMATA rights-of-way must conform to the Adjacent Construction Project Manual, which can be found at <https://www.wmata.com/business/adjacent-construction/index.cfm#main-content>. Mr. Ben Li leads our Adjacent Construction Program and can be reached at (202) 618-1016 or by email at JDAC@wmata.com.

**Washington
Metropolitan Area
Transit Authority**

600 Fifth Street, NW
Washington, DC 20001
202/962-1234

wmata.com

Thank you for providing us with the opportunity to comment. If you need any additional clarification, please contact me at jashe@wmata.com or 202-962-1745.

Sincerely,

James A. Ashe
Senior Program Manager



OFFICE OF THE CITY MANAGER
301 King St., Suite 3500
Alexandria, VA 22314

MARK B. JINKS
City Manager

703.746.4300
Fax: 703.838.6343

October 28, 2019

Ms. Anna Chamberlin
Long Bridge Project
55 M Street, SE, Suite 400
Washington, DC 20003

RE: Long Bridge Draft Environmental Impact Statement

Dear Ms. Chamberlin:

On behalf of the Alexandria City Council, I am writing to convey the City of Alexandria's endorsement of the Long Bridge Draft Environmental Impact Statement (EIS) identification of Action Alternative A as the preferred alternative. The City of Alexandria is a participating jurisdiction given its proximity to the bridge and the benefits it could realize from the project.

On September 5, 2019, the District of Columbia Department of Transportation (DDOT) and the Federal Railroad Administration (FRA) released the Draft Environmental Impact Statement as part of the National Environmental Policy Act (NEPA) process of evaluating potential environmental and human impacts of the Long Bridge Project alternatives. In this document, the Long Bridge preferred alternative, Action Alternative A, will fulfill the purpose and need of the project to expand rail capacity and the regional transportation network while minimizing costs, construction time and impacts to the surrounding area.

Construction of a new, two-track bridge would align with station and rail infrastructure improvements planned by the Commonwealth of Virginia and VRE to expand the number of commuter and intercity trains. Furthermore, the parallel bridge configuration proposed under Action Alternative A would reduce disruption during construction, which are essential to the mobility of Northern Virginia and the region.

The City of Alexandria strongly supports this project to expand mobility and reduce single occupancy vehicle traffic in the region and through Alexandria. VRE has demonstrated that its service takes a considerable number of cars off the road and will only have a greater impact with more frequent and reliable service made possible by the Long Bridge project. In addition to enabling improved commuter rail service, this project is essential for the increased rail service and improved connectivity between the Washington D.C. region and Richmond that is being advanced as part of the DC2RVA project.

Ms. Anna Chamberlin
October 28, 2019
Page 2

We appreciate the opportunity to provide comments on the Draft Environmental Impact Statement and look forward to issuance of the Final Environmental Impact Statement and Record of Decision.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark B. Jinks", with a horizontal line extending to the right.

Mark B. Jinks
City Manager

cc: Yon Lambert, Director, Department of Transportation & Environmental Services



ARLINGTON COUNTY, VIRGINIA
OFFICE OF THE COUNTY BOARD

2100 CLARENDON BOULEVARD, SUITE 300
ARLINGTON, VIRGINIA 22201-5406
(703) 228-3130 • Fax (703) 228-7430
E-MAIL: countyboard@arlingtonva.us



KENDRA JACOBS
CLERK TO THE
COUNTY BOARD

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KATIE CRISTOL
ERIK GUTSHALL
MATT DE FERRANTI

October 23, 2019

Anna Chamberlin, AICP
Long Bridge Project
55 M Street, SE
Suite 400
Washington, DC 20003-3515

Re: Long Bridge Project

Dear Ms. Chamberlin,

I am writing to provide comments on behalf of the Arlington County Board regarding the Long Bridge Project Draft Environmental Impact Statement (DEIS).

As the continuation of Amtrak’s Northeast Corridor southward from the District of Columbia (DC), and as the only intercity rail connection between DC and Virginia, Long Bridge is of regional and national significance. We thank you for your years of diligent work on behalf of this project, and we enthusiastically support the preferred alternative in the DEIS, Action Alternative A, including the proposed bicycle/pedestrian crossing as a Section 4(f) Mitigation.

Because the expansion of this crucial bridge is a once-per-century opportunity to improve cross-Potomac multimodal transportation, Arlington is vitally interested in planning and constructing the best possible project. Expanding cross-Potomac freight, intercity, and commuter rail capacity will benefit the entire eastern United States, including states well outside the study area, whose ability to expand Amtrak service connecting through Virginia to DC and New York is currently severely constrained.

Additionally, Arlington strongly supports including the parallel bicycle/pedestrian bridge as a required mitigating feature of the full project. Bicycle/pedestrian trips are growing in importance as part of our region’s transportation network, and this connection will provide a critical link. We are pleased to see it included and expect it to be constructed as an integral component of the larger project—funded simultaneously and not as a separate project. Given the inherent challenges of implementing Potomac crossings, we would have significant concerns with any potential future proposal to separate the bicycle/pedestrian component as an independent project.

We are also pleased to see the bicycle/pedestrian bridge continue across the George Washington Memorial Parkway, to connect directly with the transportation network at Arlington’s Long Bridge Park. As with all transportation modes, the network effect is vitally important to

bicycle/pedestrian travel. Connecting to the street/bike network at Long Bridge Park ensures that bridge users can continue on to sidewalks and bike lanes in Crystal City and throughout Arlington, thus providing the maximum travel benefit to Northern Virginia and throughout the region as part of the National Capital Trail Network.

We appreciate the District Department of Transportation's ongoing commitment to sustainable multimodal transportation. We thank you and your team for your excellent work on this project over many years, and greatly value the opportunity to participate in this important process.

We look forward to working with you and other partners to further refine and advance this crucial project. Please do not hesitate to let me know how Arlington can be most helpful going forward. If you have questions or need to coordinate this issue, please also feel free to contact Arlington Regional Transportation Planner Dan Malouff (703-228-7989 and dmalouff@arlingtonva.us), and/or Arlington Bicycle and Pedestrian Planner David Patton (703-228-3633 and dpatton@arlingtonva.us).

Sincerely yours,

A handwritten signature in black ink that reads "Christian Dorsey". The signature is written in a cursive style with a large, stylized initial "C".

Christian Dorsey, Chair
Arlington County Board

cc

Members, Arlington County Board
Dennis Leach, Arlington Director of Transportation



STATE OF NORTH CAROLINA
DEPARTMENT OF TRANSPORTATION

ROY COOPER
GOVERNOR

JAMES H. TROGDON, III
SECRETARY

October 24, 2019

Anna Chamberlin, AICP
Long Bridge Project
55 M Street, SE
Suite 400
Washington, DC 20003-3515

Dear Ms. Chamberlain:

The North Carolina Department of Transportation (NCDOT) Rail Division appreciates the opportunity to review and provide comments on the Long Bridge Draft Environmental Statement (DEIS). The NCDOT Rail Division acknowledges that Long Bridge Corridor serves as a critical link in the national and regional railroad network. The Rail Division is in support of the timely completion of this project as it is critical to progressing the Southeast Rail Corridor Program in North Carolina. We look forward to continued stakeholder involvement as the project progresses.

We have reviewed the DEIS, and offer the following comments:

1. We recommend the FEIS/ROD clearly state whether the proposed improvements will accommodate the future Southeast Corridor trains coming from North Carolina that were contemplated in NCDOT's Raleigh to Richmond High Speed Rail Corridor EIS. The Long Bridge DEIS mentions the Tier I EIS for the Southeast High-Speed Railroad Corridor from Washington D.C. to Charlotte, and it refers to the DC2RVA Tier II EIS, but it does not refer to the Raleigh to Richmond Tier II EIS. The Tier II FEIS for the Raleigh to Richmond corridor was approved in August 2015, and the ROD was issued in March 2017.
2. The Raleigh to Richmond Tier II EIS looked at developing high performance rail service from Charlotte-Raleigh to Richmond with continuing service to Washington, DC and the Northeast Corridor. Does the new bridge accommodate the existing Carolinian, existing long-distance trains (Palmetto, Silver Star, Silver Meteor, Crescent, Auto Train), and the four new Southeast Corridor trains in NC in addition to the Virginia trains?

Mailing Address:
NC DEPARTMENT OF TRANSPORTATION
RAIL DIVISION
1553 MAIL SERVICE CENTER
RALEIGH, NC 27699-1553

Telephone: (919) 707-4700
Fax: (919) 715-6580
Customer Service: 1-877-368-4968

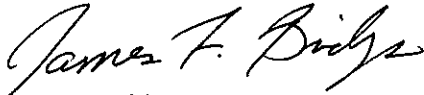
Website: www.ncdot.gov
www.ncbytrain.org

Location:
1 SOUTH WILMINGTON STREET
RALEIGH, NC 27601

3. The consequences of the no action alternative and the action alternative for the Virginia Railway Express (VRE) is well-documented as the VRE System Plan 2040 is referenced as a basis for 2040 VRE train volumes (Section 9.4.2.1). We recommend having a similar discussion in the FEIS/ROD for the benefits of the action alternative separately for CSXT, Amtrak and NS in section 9.4.1.1, where master plans, planning documents, etc. are cited, if applicable. We recommend referencing any documents in this section that can be cited as a basis for 2040 volumes. Currently table 9-4 says the action alternative 2040 volumes for Amtrak, CSXT, and NS are simply based on stakeholder input.
4. We recommend the FEIS/ROD include a broad, albeit brief, discussion regarding indirect impacts to the Southeast Corridor. In addition to this project increasing the train traffic capacity in the corridor, the implementation of this project is also anticipated to improve travel-time reliability for trains that utilize this corridor. These improvements may have the potential to have general indirect effects to the rail network south of the project area.

Thank you again for this opportunity to provide input. We look forward to providing any assistance in the future to help advance the implementation of this project.

Sincerely,



James F. Bridges, Jr, P.E.
Planning and Development Branch Manager
NCDOT Rail Division

October 28, 2019

Amtrak Comments on Long Bridge Project Draft Environmental Impact Statement (DEIS)

Amtrak appreciates the opportunity, as a consulted stakeholder, to comment on the Draft Environmental Impact Statement (DEIS) for the District DOT-sponsored project commonly known as the “Long Bridge Project,” which proposes to provide infrastructure for expanded rail capacity across the Potomac River at Washington, DC. Amtrak strongly supports this goal and appreciates the results of this effort to date. The project design team has adeptly engaged the stakeholders to create an optimal alignment through the very physically-constrained corridor between L’Enfant Plaza and the south side of the Potomac River. This DEIS, in concert with and supportive of related rail capacity enhancement initiatives sponsored by other stakeholder entities, is advancing planning for significant intercity and commuter passenger and freight rail capacity improvements between Washington, DC, Northern Virginia and Richmond.

These initiatives collectively address infrastructure requirements necessary to accommodate projected demand for increased rail passenger traffic in this corridor including significant commuter rail service increases by Virginia Railway Express (VRE), potential service extension by Maryland Rail Commuter (MARC) into Northern Virginia, and Amtrak intercity service expansion to Richmond and other Virginia, North Carolina and Southeast US markets. This forecasted increased service demand is fueled by the region’s demographic and economic growth and is in turn intensified by projected faster rail service run times, improved rail reliability, increased highway congestion, and societal desire for more mobility options. The recent decision by Amazon to locate a major east-coast operations center at Crystal City, VA, adjacent to the Long Bridge project area, is additive to this ambient demand. Freight rail traffic also shows potential for significant growth and thus rail corridor capacity improvements are needed to satisfactorily accommodate both passenger and freight rail requirements.

At this point in the Long Bridge Project EIS review process, several alternatives have been evaluated, with the resulting Preferred Alternative proposing the construction of a second two-track bridge parallel to and separated from the existing CSX Railroad-owned (and capacity constrained) two-track bridge that currently hosts all rail operations. In the Long Bridge Project area, which extends from south of L’Enfant Plaza Station in the District to the Virginia side of the Potomac River (at RO Interlocking), the build plan for the Preferred Alternative consists of four tracks throughout, interoperable by passenger and freight trains. This four-track solution is consistent with Amtrak’s preference for infrastructure and service plans providing adequate infrastructure that can reliably support each carrier’s projected service growth. Amtrak foresees a high likelihood that all rail stakeholders can agree to a full-build scenario, supported by the Preferred Alternative, that separates passenger and freight operations with reciprocal detouring capabilities.

Incremental commuter rail expansions between Washington Union Station and Alexandria previously provided for a single-track side platform at both of the two in-fill stations, L'Enfant Plaza and Crystal City, on the same side of the current three-track corridor, minimizing commuter rail passenger and freight operational conflicts in that section. Advancing design projects to reconfigure and expand L'Enfant Plaza and Crystal City stations for island platforms serving two of the planned four tracks in this section will reinforce the rail operators' common goal of conflict minimization and further reinforce the logic of passenger and freight rail operations into two parallel, two-track passenger and freight separated operations.

The proposed new Long Bridge facility in the Preferred Alternative is located on the overall corridor's (western) passenger operations side; thus, the engineered design of the Preferred Alternative should support optimal passenger train operations, while allowing for passenger/freight interoperability. Amtrak has ongoing service studies throughout its system, including increasing service in this corridor to provide more train frequencies both north and south of the Washington metro area. Within the network service studies, Amtrak is analyzing track configuration and alignment between Washington Union Station and Alexandria to reduce travel time between stations and expedite passenger boarding/alighting. Amtrak's network studies also incorporate long-range service plans of the commuter agencies like VRE's projected frequency increase and MARC's Northern Virginia service extension plans.

Throughout the Washington Union Station to Alexandria corridor which includes Long Bridge, several projects are progressing independently which Amtrak believes include design assumptions that may inhibit or limit passenger train performance. In most cases, Amtrak believes that such deficiencies can be remedied in final design. Several of these performance-optimization concepts include minor alignment and interlocking reconfigurations. These improvements can fit within the existing project envelopes, and, thus, re-design modifications are plausible without delaying schedules through Environmental Impact modifications. As several of these projects progress to final engineering design, coordination of the projects may lead to track reconfigurations not contemplated as each project design has advanced independently. The isolated design process typically defaults to replicating the existing track configuration while accommodating new tracks.

In the December 2018 Long Bridge conceptual engineering draft design, which underlies the Environmental Impact Statement, the Preferred Alternative included constraining track profiles at each end of the bridge with speed-limited 40-mph reverse "S" curves. Amtrak has simulated high-performing train operations with these speed limitations to assess running time impacts of the 40-mph curves versus unconstrained approach and bridge crossing speeds, recognizing there are speed-limiting curves at relatively short distances from the bridge approaches. As a result of these simulations, it was determined that high-performance trains can lose up to one and half minutes because of the constrained S curve design, causing a 58% increase in travel time between L'Enfant Plaza and Crystal City.

Amtrak commented on these speed limitations; the project design team considered these comments and made plan revisions to increase the speeds to 50-mph through the reverse curves for inclusion in the DEIS plans. Amtrak appreciates these changes, as they significantly improve running time performance over the original draft. However, Amtrak would like to work with its partners and the project team to seek further refinements and operational improvements in the Final Draft plan.

Amtrak believes these sub-optimal passenger train speed restrictions can be eliminated with minor environmental impact through additional adjustments to the conceptual design. Eliminating these remaining design-imposed speed restrictions (up to a 70 mph design speed goal) will shorten travel times for all passengers using the new bridge and enhance the values of rail passenger services otherwise facilitated by the project. Eliminating unnecessary speed restrictions also lowers the long-term risk of functional obsolescence risk as rail passenger transport technology emerges with higher-performing equipment, an objective that Amtrak is currently pursuing.

Speed optimizations will require minor modifications to structural designs developed during conceptual engineering. From the drawings reviewed, it appears the S curve can be eliminated entirely on the District side of the new bridge by extending the tangent alignment off the bridge to the I-395 undergrade bridge area, then designing a curve with a much higher radius (lower angle degree) to transition into the alignment along 14th Street SW. This would change the location and alignment of proposed bridges over WMATA and I-395, while containing the revised alignment, with only minor adjustment, within the existing conceptual engineering footprint. In addition, dependent on the engineering confirmation, part of the optimized alignment might shift closer to 14th Street SW, resulting in the need to shift the proposed retaining wall, but not to the point of encroaching into 14th Street SW.

The Northern Virginia approach is more challenged in effectuating an increased design speed commensurate with optimized passenger train operations as an S curve configuration will still be required to join the future bridge alignment to the existing railroad right-of-way. Reducing this curvature may entail modifications to the preliminary bridge design over the river and George Washington Memorial Parkway (GWMP) as well as potentially additional right-of-way width in the extreme corner of the Long Bridge Park, (where the preliminary design right-of-way already encroaches into the park). Specifically, refinement of design to reduce the curve sharpness might include a slight curve over the water on the new bridge's southern approach spans. As with the bridge modifications on the District side, the bridge over the GWMP would shift in location and angle, but the new design would substantially be in a similar location to that propose in the preliminary engineering design. In preliminary design, a constraint on the latitude of the S curve design was imposed to accommodate the existing RO Interlocking configuration; however, modification of the RO design and required functionality could be resolved in final design phases with plausible solutions beyond the bridge project's limits.

Another advantage of large radius (low degree) curves is that the optimal required superelevation for passenger train operation can be lower, and closer to low-speed freight train superelevation. One objective of the Long Bridge Project is interoperability of freight and passenger trains. Target speed for freight train operations in the design is 40 mph, but in reality, operations can be much slower due to nearby curves, signals, and turnouts. For freight, particularly in congested areas subject to stopping and starting such as Long Bridge, curve superelevation values are often kept at low to moderate levels to improve train handling. On the other hand, passenger trains that can be running at much higher speeds will require higher superelevation if the curves are relatively sharp (low radius/high degree) for optimum passenger comfort. Curves designed with as large a radius (low degree) as practical minimize these potential design conflicts.

Amtrak's request is that the EIS and subsequent Record of Decision (ROD) accommodates the abovementioned changes to the current conceptual engineering plans in the final design of the Preferred Alternative. This can permit a transitional refinement from preliminary to final design to thoroughly evaluate these modification suggestions without impacting project construction timeline by reopening the ROD and subject the project to additional delay. These proposed modifications can be accomplished independent of final decisions regarding facility ownership, development of detailed operating plans, and other stakeholder requirements. Amtrak has been a consistent and valuable stakeholder from the start of this project and continues to have a strong and long-term interest in this project. We would like to continue our involvement as an important stakeholder moving into final design and construction for this project.



Randy J. Marcus
Resident Vice President - Virginia

4900 Old Osbourne Turnpike
Richmond, VA 23218
Tel. 804-226-7484

October 28, 2019

Anna Chamberlin, AICP
Neighborhood Planning Manager, Planning &
Sustainability Division
District Department of Transportation
55 M Street SE, Suite 400
Washington, DC 20003
Anna.chamberlin@dc.gov

Re: Long Bridge Project Draft Environmental Impact Statement and
Draft Section 4(f) Evaluation

Dear Ms. Chamberlin,

Please find enclosed CSX Transportation's comments on the Long Bridge Project Draft Environmental Impact Statement and Draft Section 4(f) Evaluation. We appreciate the opportunity to coordinate with you on this important project.

Sincerely,

A handwritten signature in black ink that reads "Randy J. Marcus". The signature is written in a cursive style with a large initial "R".

Randy J. Marcus

**LONG BRIDGE PROJECT DRAFT ENVIRONMENTAL IMPACT
STATEMENT AND DRAFT SECTION 4(F) EVALUATION**

COMMENTS OF CSX TRANSPORTATION, INC.

OCTOBER 28, 2019

INTRODUCTION

CSX Transportation, Inc. (“CSXT”) is pleased to comment on the Long Bridge Project (the “Project”) Draft Environmental Impact Statement and Draft Section 4(f) Evaluation (the “DEIS”) submitted by the United States Department of Transportation - Federal Railroad Administration (“FRA”) and the District Department of Transportation (“DDOT”).

CSXT, the owner of the existing Long Bridge corridor, is supportive of increasing passenger rail capacity across the Potomac River. Indeed, CSXT has long hosted passenger rail on the corridor and endorses the goal of DDOT, FRA, Amtrak, the Virginia Railway Express (“VRE”), and the Virginia Department of Rail and Public Transportation (“VDRPT”) to provide additional capacity to accommodate anticipated increased passenger rail service demand in the Washington, D.C. area.

CSXT endorses FRA and DDOT’s selection of Alternative A as the preferred alternative for this project and Option 2 for the possible Bike-Pedestrian Crossing. These options provide future operational flexibility, are protective of safety, and will limit many of the short-term Project impacts. Notwithstanding that CSXT agrees with the DEIS’ ultimate selection of alternatives, there are several important comments it has with regard to the analysis.

First, the DEIS should further clarify its scope. Issuance of the DEIS is a major achievement in the Long Bridge Project. However, there are many additional hurdles before construction can begin. These include matters such as securing agreement regarding operation and maintenance of the new tracks, payment to impacted property owners, and other difficult tasks that could materially impact the Project. These requisite actions, and unknown potential costs, should be further acknowledged in the DEIS.

Second, the DEIS fails to appropriately acknowledge the extent of impacts to CSXT’s property rights associated with the Project. Construction of the Project requires CSXT to commit a substantial portion of its existing corridor to passenger rail use. While portions of the corridor are not currently in use by CSXT’s freight operations, others are and, moreover, the corridor incorporates valuable CSXT property rights and its commitment to the Project would represent the conveyance of a significant property interest. Mitigation of this impact to CSXT should be recognized in the analysis.

Third, the DEIS states that there will be certain short term outages on the entire corridor during Project construction. CSXT’s position throughout the DEIS process has been, and continues to be, that two tracks must remain in operation throughout the entire construction of the Project. If FRA and DDOT persist in the view that short term outages are truly unavoidable, further discussions are necessary to determine how to mitigate the associated impacts to CSXT’s freight rail operations. CSXT would be pleased to make engineering and operating resources available for purposes of those discussions.

Fourth, there are a number of issues that should be corrected with regard to the DEIS evaluation of noise impacts associated with the selected alternative.

Fifth, there is a discrepancy between the clearances proposed for the Maryland Avenue to L'Enfant interlocking in the body of the DEIS and the plans described in Appendix B5. Appendix B5 appears to be a prior version of the Report in which Option 2, the selected Option, includes 13-foot track centers with 8.5 foot lateral clearances. As described in Chapter 3 of the DEIS, "Amtrak, VRE, and DRPT have agreed to 14-foot track centers with 7.5 feet of minimum lateral clearance" in this area. DEIS at 3-28. Appendix B5 should be replaced with a version that reflects the current approach.

CSXT is hopeful that addressing these concerns will materially improve the impact analysis and result in a well-reasoned Final Environmental Impact Statement ("FEIS").

BACKGROUND

I. The Long Bridge is a Critical Component of CSXT's and the Nation's Freight Network

The Long Bridge is an essential part of CSXT's I-95 Corridor and National Gateway and is a "critical" part of the broader CSXT network, which encompasses 21,000 miles of track across 23 states and the District of Columbia. As the DEIS acknowledges, the Long Bridge is a "critical link in the national freight railroad network between the Northeast megaregion (which includes the District) and the Piedmont Atlantic megaregion to the south." DEIS at 2-6.

CSXT's I-95 Corridor linking New York and Jacksonville, Florida plays a vital role in moving freight along the Eastern Seaboard. To the south, the network serves local industry as well as major ports in, among other cities, Hampton Roads, Virginia; Wilmington, North Carolina; Charleston, South Carolina; Savannah, Georgia; Jacksonville, Florida; and Miami, Florida. To the north, the I-95 Corridor continues through Pennsylvania, New Jersey, New York and New England.

The north-south lines also feed the east-west routes of the National Gateway, which provides connection between the mid-Atlantic ports and Midwest consumption markets, serving customers throughout Ohio, Indiana, West Virginia, Kentucky and Tennessee. And with connections to other carriers in Chicago and other rail destinations, the network provides service to the west coast ports. The result is the primary intermodal train corridor for CSXT connecting mid-Atlantic ports to national markets.

II. CSXT's Network Drives Economic Activity and Provides Environmental Benefits in the Region

There are many benefits to a robust freight rail system, of which CSXT's network is a critical component. As described in the DEIS, "Demand for freight movement through and within the Long Bridge Corridor is growing as economic activity and population increase." DEIS at 2-4. For example, freight rail is a significant driver of economic growth in Virginia, particularly due to its integral role at the Port of Virginia.

The Port is ranked second on the east coast and fifth nationwide in infrastructure. See Robert McCabe, Port of Virginia Now Ranks Among Top 5 Biggest Ports in North America, *Virginian-Pilot* (Sept. 30, 2017), https://pilotonline.com/business/ports-rail/port-of-virginia-now-ranks-among-top-biggest-ports-in/article_03bcd78a-f714-5249-867d-4e5c226ba93d.html. According to the Virginia Rail Plan, the freight rail network has a unique role in supporting the Port of Virginia's target markets in the Midwest. *Virginia Statewide Rail Plan 5-10* (2017). In fact, the "port has the strongest rail integration in North America," with 38% of its cargo handled by rail. CBRE, *2017 North America Seaports & Logistics Annual Report 17* (Sept. 2017), <http://bit.ly/2kOw9OL>.

These Virginia statistics are reflective of the railroad industry's broader economic impact: Nationally, CSXT and the other Class I railroads support approximately 1.5 million jobs, \$273.6 billion in economic output, \$88.4 billion in wages, and \$32.8 billion in tax revenue annually. See Towson University, Regional Economic Studies Institute, *Economic and Fiscal Impact Analysis of Class I Railroads 13* (2016).

A typical CSXT freight train is four times more fuel efficient than highway freight transportation and an intermodal train can carry an average cargo load of 280 trucks. Since 2013, CSXT has enabled the conversion of 198,000 loads equivalent to containerized freight from truck traffic to trains through its Highway to Rail (H2R) initiative, reducing greenhouse gas emissions for those shipments by 78%. CSX Corporate Social Responsibility Report (2016), available at https://www.csx.com/share/wwwcsx15/assets/File/About_Us/Responsibility/CSXCSR2016.pdf. On average, the company can currently move a ton of freight 474 miles on a single gallon of fuel. *Id.*

In Virginia alone, freight rail annually carries over 800,000 carloads of coal, 534,000 carloads of mixed goods, 120,000 carloads of chemical products, 103,000 carloads of food products, and 85,000 carloads of pulp and paper products. *Virginia Statewide Rail Plan 5-10* (2017). This keeps over 5.5 million trucks off the highways. *Id.* Savings to the State in pavement maintenance costs alone are over \$123 million (2016 dollars), almost 6% of the Virginia Department of Transportation's annual maintenance budget. *Id.*

In light of the many economic and environmental benefits of freight rail, it is important that the expansion of capacity in the Long Bridge corridor ensure that CSXT's current and future freight rail operations remain a focus, even in the face of increased demand for passenger rail access.

DISCUSSION

I. The DEIS Should Clarify its Scope

The DEIS accurately states, consistent with NEPA, that it "identifies the potential effects of the Long Bridge Project on the human and natural environment. The DEIS also identifies measures to avoid, minimize, or mitigate potential adverse impacts." DEIS at 1-1. While this scope is appropriate, CSXT believes the FEIS should identify aspects of

the Project that *are not resolved* by the analysis. The DEIS does not define or resolve any of the following, and should explicitly state that it is not to be interpreted as bearing on the resolution of any of the following:

- a) ownership, maintenance and governance of the newly constructed tracks;
- b) the amount of compensation owed to property owners whose rights will be impacted by the Project;
- c) permission to construct the Project, which must be granted by CSXT, the owner of the existing Long Bridge Corridor;
- d) other permits and permissions necessary to lawfully construct the Project; or
- e) operating rights of the various carriers to use the newly constructed tracks.

These factors, along with the remaining uncertainties inherent in an engineering Project of this scale, could materially increase the costs and impacts associated with the various alternatives discussed. For example, the entity that is selected to oversee and perform maintenance on the new tracks will incur significant costs associated with these tasks, which costs should be borne by the entities for which the increased capacity is intended to serve (*i.e.*, the passenger rail entities). The FEIS would ideally perform reasonable estimation of these costs and incorporate them into the analysis and, at a minimum, should identify them as significant and unresolved.

While there are many factors that will likely increase complexity of the Project beyond what is discussed in the DEIS, one of the most complex areas of the Project is the Maryland Ave to L'Enfant Interlocking area. DDOT and FRA's selected proposed track configuration in this area does not meet CSXT's company-wide safety-based clearance requirement that newly constructed track include 15 foot track spacing. DEIS at 3-28. CSXT proposed various changes to DDOT and FRA's original proposal for this area, aimed at maintaining safety and a reasonable allocation of risk. The CSXT proposal included, among other things, adjusted clearances and added safety features to help mitigate the risks associated with building this area of track with sub-optimal clearances. Many of these proposed features have been incorporated into DDOT and FRA's design.¹ There are, however, several outstanding requirements CSXT set forth in its letter of September 18, 2018. Satisfaction of the remaining requested items is important to CSXT's ability to safely and cost-effectively operate in the as-proposed track configuration for this area.

CSXT understands that not all details of the Project legally need be, nor practically can be, resolved prior to the issuance of a FEIS. And, even in light of the uncertainties discussed in this section, CSXT believes DDOT and FRA have selected well from the action alternatives available. Therefore, CSXT proposes that the FEIS

¹ Note, however, that Appendix B5 needs significant updating to reflect the elements and configuration CSXT proposed. This is further discussed in Section VIII below.

address these unknown factors by acknowledging that they have yet to be resolved and further discuss the potential uncertainty they create.

II. The DEIS Fails to Appropriately Acknowledge Impacts to CSXT's Property Rights

The DEIS acknowledges that CSXT owns the current Long Bridge. It should further acknowledge that CSXT is also the property owner in the Long Bridge corridor where many of the new proposed interlockings will be built. Chapter 12 of the DEIS discusses impacts to property owners including, for example, loss of parking spaces at the Washington Marina and "small impacts to the properties along the right-of-way." DEIS at 12-13. But it entirely ignores the very substantial impacts of the Project to CSXT's property rights within the right-of-way.

In order for the Project to be constructed, CSXT will be required to commit a significant portion of its right of way to the new tracks and ancillary structures, need for which is driven by passenger rail demands, not CSXT's own freight rail demands. Commitment of CSXT's property to this non-business-driven use will significantly diminish the value of the property to CSXT. Just as the DEIS discusses less substantial impacts to other private property interests and mitigation for these impacts, so too must it discuss the impacts to CSXT and appropriate mitigation. For example, the DEIS acknowledges that in order to mitigate private property loss the Project must "appropriately compensate property owners for loss of parking spaces and revenue." DEIS at 12-31. CSXT's loss of property and potential revenues associated with the loss of use of a portion of its right of way must also be incorporated into the analysis.

III. The DEIS Does Not Meet CSXT's Requirements With Regard to Track Outages

CSXT has previously explained to DDOT and FRA that in order to avoid impacts to its operations, it needs two tracks available for use throughout the entirety of construction with no outages. The DEIS nonetheless states that "it is anticipated that over the duration of the Project, there would be seven night outages, one day outage, and three 55-hour weekend outages that would affect maintaining two-track operations." DEIS at 9-23. While these impacts may seem minor in comparison to the duration of the Project, they nonetheless will impact CSXT's operations to an extent not previously anticipated. Mitigation of these impacts should be considered in the FEIS and must be discussed among the stakeholders.

In addition, CSXT questions whether it is appropriate to identify potential outages to two-track operations with this level of detail at this stage in the project. The need for outages will no doubt evolve over the course of the more detailed design. CSXT would be pleased to make engineering and operating resources available to help minimize the extent of outages required in the final design.

Finally, the DEIS should acknowledge that the anticipated night and weekend closures will disproportionately impact CSXT's freight operations, which predominantly

occur on nights and weekends to allow passenger train traffic to predominate during prime commuting hours.

IV. The DEIS Fails to Accurately Assess Noise Impacts of the Project

There are several issues with the noise impact analysis that should be corrected in the FEIS, including that:

1. The DEIS concludes that the relatively high existing noise conditions at the Mandarin Oriental Hotel are “due to the presence of wheel squeal generated by trains on the curved track.” DEIS at 13-6. This conclusion is uncited and CSXT is unaware of support for it. It should be supported in the FEIS by detailed data. In addition, the FEIS should acknowledge that wheel squeal is not the only source of noise impacts. This will increase flexibility in considering potential mitigation measures.
2. In light of the importance accorded wheel squeal to the analysis, the FEIS should acknowledge that the selected action alternative may result in an increase in curvature of the track adjacent to the Mandarin Oriental Hotel. The proposed track configuration near the Mandarin Oriental Hotel increases the degree of curvature from 5.45 degrees to approximately 8.15 degrees. DEIS Appendix B5 at Option 2 Plan Figure. The steeper proposed curve will undoubtedly increase the likelihood of wheel squeal, a fact that must be acknowledged, quantified, and mitigated in the analysis. CSXT has previously encouraged DDOT and FRA to reduce the curvature in this area. While the 8.15 degree curve is slightly less steep than prior proposals considered, CSXT nonetheless believes efforts should be made toward further reduction.
3. The DEIS discusses that construction noise limits are more restrictive at night, but fails to adequately acknowledge that most construction will be required to occur at night during these more restrictive periods. The analysis states that “***If construction occurred at night***, noise levels would exceed the District nighttime limit (65 dBA [Lmax]) at all locations within approximately 500 feet from construction activities.” DEIS at 13-13 (emphasis added). Elsewhere in this Chapter, the DEIS acknowledges that there are important receptors within 500 feet of the rights of way where construction will occur, including the Mandarin Oriental Hotel and the Portals V Residences. In order to ensure minimal interruptions to track operations, much of the construction will need to occur at night. The FEIS should, therefore, acknowledge the potential for more temporary night noise impacts than are currently discussed.
4. The DEIS concludes that use of a wayside top-of-rail friction modifier system and gauge-face lubrication will “eliminat[e] the presence of wheel squeal.” DEIS at 13-15. The use of the word “eliminating” in this discussion is inappropriate as these systems have been shown only to reduce the impacts of wheel squeal.
5. The DEIS concludes that the wheel squeal mitigation measures will result in a 12 dBA reduction at the Mandarin Oriental Hotel and a 10 dBA reduction at the Portals V Residences. These conclusions are uncited and CSXT is unaware of support for

them. The FEIS should provide citations and data to support these conclusions. It is likely also appropriate to provide approximate ranges of anticipated reductions, rather than definitive amounts of dBA reduction.

6. The FEIS should clarify that under the no action alternative, noise related to individual freight trains will not change and that any increased noise resulting from freight trains is a result of increased market demand for freight services. The DEIS concludes that under the No Action Alternative, noise at the Mandarin Oriental Hotel and Portals V Residences will increase by 3.9 dBA by 2040. DEIS at 13-7. This conclusion is driven, in large part, by the fact that the DEIS projects an increase in the number of CSXT trains travelling through the corridor per day from 18 to 42 by 2040. DEIS at 3-29. The conclusion that CSXT will increase its daily traffic by 24 trains, or 130% over existing levels, was drawn from the Environmental Impact Statement for the DC2RVA project. However, as noted in the DC2RVA FEIS, “CSXT actual freight growth may be greater or less than the projected growth rates based on market demands.” DC2RVA FEIS at 2-49. There is significant uncertainty in projecting the actual volume of freight train traffic in the No Action Alternative because it is driven by unknowable future market conditions. Whether or not the associated noise impacts will occur is similarly uncertain. The FEIS should acknowledge this uncertainty.
7. The DEIS should clarify that an increase in number of trains, resulting in an increase in noise impacts, is far more certain under the selected action alternative than under the no action alternative. As discussed above, the predicted increase in freight traffic is subject to significant uncertainty. On the other hand, that the number of passenger rail trains will increase under the selected action alternative is a certainty and the primary goal of the Project. That noise impacts will increase under the selected action alternative is far more likely than that noise impacts will increase under the no action alternative. As such, the conclusion that the selected action alternative results in lesser noise impacts than the no action alternative should be reevaluated to take into account the relative likelihood of increased impacts in each scenario. This in no way alters CSXT’s support for the selected alternative. Rather, we raise this simply to inform the discussion regarding appropriate mitigation.

V. Appendix B5 Must be Updated

As noted in the DEIS, “Amtrak, VRE, and DRPT have agreed to 14-foot track centers with 7.5 feet of minimum lateral clearance” for the challenging tunnel area below Maryland Avenue in the District. DEIS at 3-28. DDOT and FRA have also endorsed this approach, including in the Appendix B6 Conceptual Engineering Plans. Appendix B5, however, reflects an old DDOT and FRA proposal for Option 2, the selected Option, that relies on 13-foot track centers and 8.5 foot minimum lateral clearances. DEIS Appendix B5 at p. 5. The Appendix should be corrected to reflect DDOT and FRA’s current proposal for the area, a proposal that has garnered more stakeholder report than that set forth in the current version of Appendix B5.

CONCLUSION

CSXT supports DDOT and FRA's selection of alternatives in the DEIS and is providing these comments with a view to addressing important gaps and deficiencies in the analysis. We look forward to further discussion with DDOT and FRA regarding these issues and to further progress toward realizing the proposal set forth in the DEIS.

Farmer, Lee

From: Judd Isbell <lumberjackcycles@gmail.com>
Sent: Monday, October 28, 2019 10:44 PM
To: info@longbridgeproject.com
Subject: [External] Alexandria BPAC Comments on Draft EIS

The Alexandria Bicycle and Pedestrian Advisory Committee is writing to express support for the proposed pedestrian and bicycle bridge that is described in the Long Bridge Project's Draft Environmental Impact Statement. The Alexandria Bicycle and Pedestrian Advisory Committee (BPAC) is a 501(c)3 nonprofit that promotes walking, biking, and other active transportation, and advocates for infrastructure, policy, and cultural changes that create a safe, accessible, and livable city for all.

The Long Bridge Project will provide significant benefit to residents of Alexandria by providing additional rail travel options to Alexandria residents who use VRE, Amtrak and MARC trains. The proposed pedestrian and bicycle bridge will provide significant benefit to the large number of Alexandria residents who use the Mount Vernon Trail for fitness, recreation and transportation. Many of the existing pedestrian and bicycle bridges across the Potomac River are either dangerously narrow, difficult to get to, or already near capacity during peak travel hours. A new pedestrian and bicycle bridge will give trail users another option to reach DC and likely increase the number of Alexandria residents who walk and bike instead of drive, consistent with Alexandria's Environmental policies and plans.

We hope that the final Environmental Impact Statement will consider suggestions for improving the proposed pedestrian and bicycle bridge such as increasing platform size to accommodate a wider variety of bikes. The platforms on the ramp between the Mount Vernon Trail and the bridge are not wide enough to adequately accommodate all trail users such as those riding cargo bikes or tandem bikes, or pulling bike trailers or trail-a-bikes. The pedestrian and bicycle bridge should be built at the same time as the rail bridge to reduce the amount of time that the Mount Vernon Trail will be impacted. The project should include construction of the Gravelly Point bypass which is currently in the National Park Service's Paved Trails Plan. This bypass would help mitigate the risks associated with increased trail traffic. The bridge should incorporate railing design that does not reduce the effective bridge width, which occurs when users avoid proximity to a vertical barrier.

Thank you for your consideration of our comments. We look forward to the positive impacts that the new Long Bridge rail, pedestrian and bicycle bridges will bring to our region's transportation network.

Judd Isbell
Member
On Behalf of the Alexandria Bicycle and Pedestrian Advisory Committee

Long Bridge Project
Comments regarding
Draft Environmental Impact Statement (DEIS)

Audubon Naturalist Society
Comments Emailed by Renee Grebe
Monday, October 28, 2019

The Audubon Naturalist Society (ANS) is the Washington, D.C. region's oldest independent environmental organization, with a long history in Northern Virginia and Fairfax County. As ANS's Northern Virginia Conservation Advocate, and on behalf of our over 10,000 members and supporters in the greater Washington, D.C. region, I hereby submit comments in regards to the Long Bridge Project's Draft Environmental Impact Statement (DEIS).

Support for a new two-track bridge with a separate bike-pedestrian bridge crossing

We strongly support the Preferred Alternative for a new two-track bridge and a separate bike-pedestrian bridge. As our region deals with the challenges of reducing both traffic congestion and greenhouse gas emissions, having alternative means of transportation is key to ensuring we can reach these goals.

A new two-track rail bridge will better connect the communities across the Potomac River by significantly increasing VRE capacity (from 34 to 92 trains per day). This increased capacity means a more highly functioning regional transit network, allowing more flexibility and reliability of transit options for commuters. The increased rail capacity will allow significantly more freight, from 18 to 48 trains per day.

A separate bike-pedestrian bridge crossing will allow more mobility options for crossing the Potomac and contribute to a rich network of walking and biking trails in the DC area. This connection can serve as yet another safe alternative to driving, not only for commuters in the region, but also for recreational activities as well.

Restore impacted areas to a higher ecological function than were previously, when possible

ANS understands that projects like this will come with environmental impacts. However, this project also has the opportunity to plan for restoration of impacted areas with an eye towards enhancing the impacted property over what currently exists today. For example, the staging areas in the clover

leaves¹ should be restored with native trees, with a plan to sustain them for up to a year following the replanting, with regular watering and invasive plant controls. A restoration approach should be considered for all environmentally impacted areas.

We appreciate your consideration of our comments. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Renee Grebe". The signature is written in a cursive, flowing style.

Renee Grebe
Northern Virginia Conservation Advocate
Audubon Naturalist Society

¹ Figure 5-4 http://longbridgeproject.com/wp-content/uploads/2019/09/Chapter05_NaturalEcologicalSystemsEndangeredSpecies_LongBridgeDEIS.pdf



**Comments Concerning the
Long Bridge Project
Draft Environmental Impact Statement**

October 28, 2019

The Committee of 100 on the Federal City (Committee) is pleased to submit these comments regarding the Long Bridge Draft Environmental Impact Study. We hope that the new two-track bridge being proposed to link the District with Virginia will eliminate the current bottleneck and provide for separating passenger and freight traffic as the Committee has requested before. However, we are surprised and disappointed by the significant errors that confuse the track spacing in the Maryland Avenue SW Corridor by showing it at 13 feet in some tables and diagrams, and 14 feet in the text and other diagrams. Detailed examples are presented below.

The potential solution as described for the design restrictions of the Maryland Avenue SW Corridor will enable four tracks to be installed. Their construction, along with improvements proposed for the L'Enfant Plaza VRE Commuter Rail Station (under a separate project), offers the opportunity to significantly improve commuter rail service through the corridor. But the confusion in the document, 13-foot track centers or 14-foot, raises other questions about what else may be wrong.

Maryland Avenue SW Corridor

The Committee appreciates the efforts to examine the feasibility of widening the Maryland Avenue SW Corridor to allow for 15-foot track centers to meet CSX specifications. It is unfortunate that such an effort would cost \$250 million and add five years to the project, not to mention the disruptions to the local businesses and roadway users.

However, there are errors in the presentation. Initially, CSXT requested their minimum 15-foot track spacing design standard be maintained for freight tracks. However, CSXT, Amtrak, VRE, and DRPT all requested the analysis to evaluate 13-foot spacing for passenger trains. As stated on page 3-28 and later on page 18-9, CSXT and operators Amtrak, VRE, and DRPT have agreed to accept 14-foot track centers. But examining the plans and tables of Appendix B5 (Clearance Assessment), track centers of 13 feet with a minimum of 8.5 feet lateral clearance are given as the preferred design. This will fit four tracks underneath Maryland Avenue, between the existing buildings and retaining walls with minimal or no significant obstacles. These dimensions have been identified as the minimum acceptable geometry by current operators. Support letters have been received from Amtrak, VRE, and DRPT, which are included in the appendix, but only one, VRE, specifically supports the 8.5-foot lateral clearance. Additional inconsistencies are found in other chapters, such

as page 9-31 that states 14-foot track centers. Then Appendix B6 shows 14-foot centers as well on the conceptual engineering plans. There are no letters of support from MARC and NS. Although not listed, the Committee assumes that MARC and NS have been involved in these discussions. They should be added to the list of stakeholders involved.

The track spacing in the Maryland Avenue SW Corridor needs to be clarified – will it be 14-foot track centers or 13-foot track centers? What will be the lateral clearances? How will the 14-foot track centers impact the estimated costs for structural improvements in the Maryland Avenue Corridor as shown in Table 1-1 for Option 2, with 13-foot track centers? Option 2 is the preferred option to minimize structural improvement costs. As the DEIS states, proceeding with any option other than Option 2 presents a significant risk to public financing for the project. How will 14-foot track centers impact this financing?

Cross Section of Maryland Avenue SW

Cross Section A-A of Figure 3-12, page 3-24, illustrates the required lowering of the tracks through the Maryland Avenue SW Corridor to provide the increased overhead clearances needed for freight and passenger service. Later, on page 3-27 (line 450) it states that the preliminary design should not preclude future electrification along passenger tracks. So, will the tracks in the Maryland Avenue SW Corridor be lowered to the depth needed so that future electrification can be installed? Or will that additional excavation wait until there is a funded plan for electrifying the passenger route to Richmond? Future electrification is discussed in Appendix B2, Structures Study Report, Section 7.2 Future Electrification, but no details regarding Maryland Avenue SW are given.

Also, Appendix B2, Sections 7.1 Bike-Pedestrian Crossing and 7.2 are discussed on page 27, not page 28 as shown in the Table of Contents.

L’Enfant Plaza VRE Station

Although not a part of the Long Bridge Project, the importance of coordinating the adjacent L’Enfant Plaza VRE Station improvements with the construction of the four tracks and establishing a direct connection to the L’Enfant Plaza Metro station below (with its five routes – Orange, Blue, Silver, Green and Yellow) cannot be stressed enough. This will make a joint L’Enfant Plaza VRE/Metro station a major transportation hub in SW DC.

DC Department of Energy and Environment

At the Public Meeting on October 22, Committee members discussed with DDOT staff details about the safety of the Maryland Avenue SW Corridor. One question concerned the DC Department of Energy and the Environment (DOEE) and whether they had been involved since that office is responsible for investigative and surveillance activities related to the safety of facilities, equipment, rolling stock, and operations of railroads and railroad carriers operating in the District.

DC Law 21-254. *Rail Safety and Security Amendment Act of 2016*, Section 108c (c) states:

"The Director may engage in investigative and surveillance activities related to the safety of facilities, equipment, rolling stock, and operations of railroads and railroad carriers operating in the District and may take enforcement actions, to the extent permissible under 49 U.S.C. § 20101 *et seq.*), or any regulation issued thereunder,"

The Virginia DRDT is an active participant, but there is no description of DOEE's participation in evaluating the safety of what is being proposed. We were assured that DOEE staff had attended several meetings, and DOEE is listed as a Participating Agency in Table 25-2. What comments or input did they have when reviewing the safety of what is being proposed?

Train Volume Estimates for 2040 and Bridge Capacity

The Committee has raised questions in the past as to the accuracy of the 2040 train volume estimates. It appears that the latest projections reflect the most up to date data available from all railroads involved. As passenger demand and freight traffic grow, the train volumes for all rail users will eventually reach the projected 2040 volumes as presented in various tables. Have any estimates been made as to what the actual capacity of the 4-track Long Bridge will be?

Bicycle-Pedestrian Crossing

Although not required for the Long Bridge Project, the pedestrian and bicycle bridge examined as mitigation for loss of parkland presents an opportunity to provide an important connection within the regional trail system, linking Crystal City and the District. As explained in the Executive Summary, the bridge would connect Long Bridge Park with NPS Parking Lot C in East Potomac Park. Ramps would connect the crossing with a path just north of the new Long Bridge Park Aquatic Center, the Mount Vernon Trail, and East Potomac Park. The Committee hopes that the design effort will examine additional connections to bicycle paths in the District and Virginia, such as to Washington Marina or the Mandarin Oriental Hotel pedestrian bridge to improve capacity and safety for bicyclists and pedestrians alike.

Noise and Vibration Studies

The Executive Summary, on page 26, states that noise and vibration levels will increase under the preferred alternative as more trains begin operations. For example, increased noise levels are expected to exceed FRA severe noise criteria at the Portals V Residences, the Mandarin Oriental Hotel and parts of Long Bridge Park. Noise would also exceed FRA moderate noise criteria in other parts of Long Bridge Park.

The only reference to vibration impacts occurs when construction activities are discussed, but no mention of increased vibrations due to the increase in train traffic is mentioned for any location. However, Appendix D1: Methodology Report, Section 11, Noise and Vibration, explains the need for noise and vibration studies for both construction monitoring and train vibrations. These details should be added to the Executive Summary. Before construction begins, vibration data from train operations should be recorded to enable appropriate before/after studies to be conducted.



October 28, 2019

Long Bridge Project
Att: Anna Chamberlain

Re: Draft EIS for Long Bridge Project

The Crystal City Civic Association has long been supportive of the plans to enlarge the Long Bridge to accommodate four train tracks and a pedestrian/bike bridge, in particular Alternative A. To this end, we have participated in the working group meetings to the extent possible. At the most recent meeting, we were represented by Eric Cassel, also President of the Friends of Long Bridge Park, who commented on the recent EIS draft. We are only now becoming aware of potential problems of impact on Crystal City residents.

We agree in general with the concerns about potential impact of the work proposed in the draft EIS on Long Bridge Park, as expressed by Mr. Cassel and the Friends of Long Bridge Park, who have submitted their concerns in writing. We are interested in all of the assessment areas dealt with in the draft EIS, and impressed with the thought and effort reflected in the document. However, because of time limitations, we are focusing our comments here primarily on issues that directly affect human beings in Crystal City.

As we understand the draft EIS, the baseline for determining the impacts of the LBP and other projects is the No Action Alternative – a projection of the existing situation to 2040. The impact that is measured for each project is an increment to or from the baseline. The majority of the EIS deals with assessments of the impacts of the projects per se, with one chapter dealing with cumulative effects.

We understand that the 1.8 mile Long Bridge Project is a project in itself, but it also is a piece of a multi-project initiative called DC2RVA. It is not clear to us whether and/or how the increments of all of the various projects are added together. For example, the draft EIS states that Long Bridge Project assessments are made for trains going 90 MPH or less. However, DC2RVA is designed to be for trains traveling at higher MPHs. **If speed of trains has any influence on the assessment subjects, it would be useful to indicate what they might be.**

We are particularly interested in the assessments being made on increments because residents live not far from the south end of the LBP and also are directly affected by the VRE Crystal City Station project. The VRE project begins where the LBP project ends. Taken together, the two projects have impacts extending the length of Crystal City, and include, for example, the curve on Crystal Drive where wheel screech and other noise is a problem. **We would like to understand the impact of the two projects taken together and how mitigation during construction and subsequent operations applies to the two.**

We would also like to express our concerns about the proposed “Temporary Land Use and Impact” on Crystal City at the southern end of Long Bridge Park. The EIS states in chapter 12, line 98, that “The southernmost part of the Local Study Area includes private commercial, residential, and mixed uses in the Crystal City area.” It further states in lines 355-356 that “Open space at the south end of Long Bridge Park (negligible adverse direct impact, as park uses would remain undisturbed).” However, Figure 12-12 “Temporary Land Use and Property Impacts – Crystal City” clearly shows that the area of temporary impact would include the entrance to Long

Bridge Park at 12th Street and Crystal Drive that belongs to Arlington County, as well as the small park belonging to JBG Smith that borders several residential buildings. This is a lovely, calm area used extensively by local residents as well as by visitors to Long Bridge Park.

It is unclear from the EIS what this “temporary impact” might be. However, if it becomes an active staging area for construction, it would greatly impact residents and visitors to the Park and quickly become a negative issue for all concerned. We agree with the Friends of Long Bridge Park that this would not be an acceptable use of this space. **We hope that you will identify and utilize an alternative staging location that does not affect public space in Crystal City.**

We are concerned about noise impacts and some of the data provided about them. For the Long Bridge Project, there is a cumulative assessment for noise that is important on two counts. In the EIS, a distinction is made between direct and indirect impacts. Direct effects occur at the same time and place as the project action; indirect, later in time and farther removed in distance. The cumulative assessment, reflecting indirect impacts, states, “The permanent impacts of Alternative A when combined with the permanent impacts of other past, present and reasonably foreseeable future projects would result in an overall moderate to major adverse cumulative impact on noise. This is because of the cumulative increase in noise from Action Alternative A and the DC OAPM project....” (Section 21.3.2.1.) For many, the direct impacts may seem quite limited, especially the size of the area studied. This **information is useful and lends credence to the analysis.**

However, the areas considered for assessments of “noise” and “public health” are different. No residential buildings are included in the noise assessment. In the public health section, the study area includes 4 residential buildings that are close to the southern end of the project site. The EIS describes noise in terms of degrees of “annoyance.” However, science increasingly indicates that noise pollution can create both physical and mental health problems. Given the proximity of the noise study area to the public health area, it appears likely that more-than-minor adverse effects could affect residents, not just potential visitors to Long Bridge Park.

The EIS inclusion of possible noise mitigations, including but not limited to, at least two available rail systems that dampen noise is encouraging and useful. **Especially because a large increase of the number of residents in Crystal City is expected from recently completed and planned residential units, we hope these and other possible mitigations will be put in place.**

We recognize that resources and time are limited. But we hope that we can work with you to mitigate impact on Crystal City residents in the productive way we have done with CSX in the past, with developers, and in welcoming of Amazon to our area.

Regards,



Carol Fuller
President, CCCA

Cc: Arlington County Board
Arlington County Board Manager
JBG Smith – Andrew Van Horn



To: The Long Bridge Project
From: The Friends of Long Bridge Park
Date: October 28, 2019
Subject: Draft EIS for the Long Bridge

Overall the Friends of Long Bridge Park support Alternative A for the Long Bridge Project. At the Project Hearing, the President, Eric Cassel, did present comments to the hearing. At that time, we were unaware of three elements of the EIS that present problems.

First, we do not support a particular part of the EIS proposal. In Chapter 12, lines 355-356 propose using the south part of Long Bridge Park for construction activities. This is NOT an acceptable use of the space. This part of Crystal City is in the CIP for Arlington County for park development and this would prevent any development of the park. In addition, it would prevent usage of elements of the park, hinder entrance to the park and be an eyesore.

Second, in lines 359-360 there is also usage of the park for construction. It is not clear if this is for the actual railroad bridge or the Pedestrian Bridge. Clearly to connect Long Bridge Park to the Pedestrian Bridge requires work in Long Bridge Park and we approve of such actions. If the plan is to use part of the park for other purposes, then we would want additional information.

Third, Taking of land at the North End of the park (285-289 Chapter 12) is also not recommended. We understand the amount of land is small, but still there may be legal problems and we dislike any parkland permanently changed to Railroad right of way. This decreases the amount of parkland in the area and is not recommended.

While the overall project is acceptable, these small parts of the EIS are not acceptable.

Farmer, Lee

From: Mount Vernon Trail <mtvernontrail@gmail.com>
Sent: Monday, October 28, 2019 6:46 PM
To: info@longbridgeproject.com
Subject: [External] Draft EIS Comments From the Friends of the Mount Vernon Trail

The Friends of the Mount Vernon Trail support the pedestrian and bicycle bridge included in the Long Bridge project, which is proposed as a mitigation for the impacts that the rail bridge will have on the George Washington Memorial Parkway and users of the Mount Vernon Trail. As the Draft Environmental Impact Statement noted, construction of the bridge will have multiple impacts on Mount Vernon Trail including significant detours and noise during construction, a tripling of rail usage, impacts to views, loss of park land, loss of mature vegetation and possible increased trail traffic. We agree with the Draft EIS that these impacts are significant and require a mitigation.

The proposed pedestrian and bicycle bridge is the appropriate mitigation for these impacts. We also suggest that the final Environmental Impact Statement considering the following:

1. The pedestrian and bike bridge should be built concurrently to reduce prolonged construction on the trail and provide a more timely mitigation.
2. The bridge should be made as wide as possible and consideration should be given to installing railing that does not limit the effective width of the bridge. Bicycle users tend to stay two feet away from vertical structures, which can remove four feet of effective width from a bridge.
3. The platforms on the switchbacks between the trail should be enlarged to ensure accessibility for all trail users including children, wheel chairs, cargo bikes and tandem bikes.
4. The trail in the construction area will likely be damaged by construction. As part of the mitigation, the section of trail from Gravelly Point to the 14th Street Bridge should be resurfaced.

The Friends of the Mount Vernon Trail is a 501(c)3 nonprofit that supports the Mount Vernon Trail for all users by increasing safety, promoting access, improving facilities and creating stewards.

Thank you for your time and attention.

Judd Isbell
President
Friends of the Mount Vernon Trail

October 28, 2019

Anna Chamberlin, AICP
Long Bridge Project
55 M Street, SE
Suite 400
Washington, DC 20003-3515

Dear Ms. Chamberlin:

The Greater Washington Partnership (the Partnership) is a team of civic-minded CEOs, drawing from leading employers and entrepreneurs, who are committed to making the Capital Region of Baltimore, Washington, and Richmond one of the world's best places to live, work and build a business. The 26 leaders that make up the Partnership, employ more than 200,000 people in the region, and represent a wide range of innovative organizations across industries, including Capital One, Dominion Energy, Johns Hopkins University, Northrop Grumman, and MedStar Health. The Partnership supports the Draft Environmental Impact Statement identification of Action Alternative A as the preferred alternative, because it best fulfills the purpose and need of the Long Bridge project to expand the capacity of rail services to the regional transportation network.

The Partnership's Blueprint for Regional Mobility, released in November 2018, recommends several specific action steps to modernize our region's intercity and commuter rail, including the removal of bottlenecks limiting the rail system's speed, frequency, reliability, and growth. This includes Long Bridge.

Long Bridge was constructed in 1904 and is a two-track freight and passenger rail crossing over the Potomac River connecting the District of Columbia to Virginia. The bridge is at capacity during peak period today, and it must be expanded in order to meet the estimated 150 percent growth in passenger and freight service over the next 20 years from 76 trains today to more than 190 trains. Doing so will enable bi-direction VRE service seven days a week, allow more Amtrak trains to extend into Virginia, and unlock the opportunity for run-through service of MARC and VRE beyond Union Station, enabling a true regional commuter rail system.

On September 5, 2019, the District Department of Transportation (DDOT) and the Federal Railroad Administration (FRA) released the Draft Environmental Impact Statement as part of the National Environmental Policy Act (NEPA) process of evaluating potential environmental and human impacts of the Long Bridge Project alternatives. Construction of a new, two-track bridge proposed under Action Alternative A would reduce disruption to ongoing VRE services and adjacent transportation links during construction, which are essential to the connectivity of the region. It would also provide a critical new multimodal bike and pedestrian connection across the Potomac River.

For these reasons, the Greater Washington Partnership fully supports the Draft Environmental Impact Statement identification of Action Alternative A as the preferred alternative.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason S. Miller", with a long horizontal flourish extending to the right.

Jason S. Miller
CEO, Greater Washington Partnership



National Ferry Corporation

October 28, 2019

Anna Chamberlin
District Department of Transportation
55 M Street, SE
Suite 400
Washington, DC 20003

RE: Long Bridge Project, Public Comment

Dear Anna Chamberlin,

Our company, National Ferry Corporation (“NFC”), operates a waterborne sightseeing business from the Washington Marina. Marina management recently notified me of the subject DDOT Long Bridge Project (the Project) and informed me that public comments concerning the Project can be submitted to your office through today. Of concern is that the Project currently incorporates a prospective plan to take over our contracted parking lot within the Washington Marina for the duration of the project. That parking lot is home to our ticket booth and our customer and staff parking, and is the secure access point to our docks and vessels. I have included an excerpt from your Project Chapter 12, Land Use and Property Section, which highlights the lot planned for closure. That excerpt provides a clear visual demonstrating that our entire operation would be crippled by a take-over of that lot by DDOT.

NFC has been a faithful tenant of The Washington Marina Company since 2015 when we first contracted with the marina for three commercial docks. That Agreement also provides for the housing of our ticket booth and parking for our crew at the marina’s west parking lot. The Agreement also provided that we could offer necessary customer parking for our public cruises and charters. Over the past 5 years, NFC has provided a safe and memorable cruise experience from The Washington Marina to over 500,000 passengers and provided jobs and career training to 100 past and present employees. The lot closure would mean the end to our company and the loss of jobs for local residents, and we beg you to reconsider and modify your plan for staging your vehicles for the project.

With your esteemed history and expertise in mobilization and staging effort similar to the Long Bridge Project, I am certain that you could modify your plan to incorporate a different area other than the west parking lot in the Washington Marina to park Project vehicles, rather than permanently closing down our company and putting DC residents out of work.

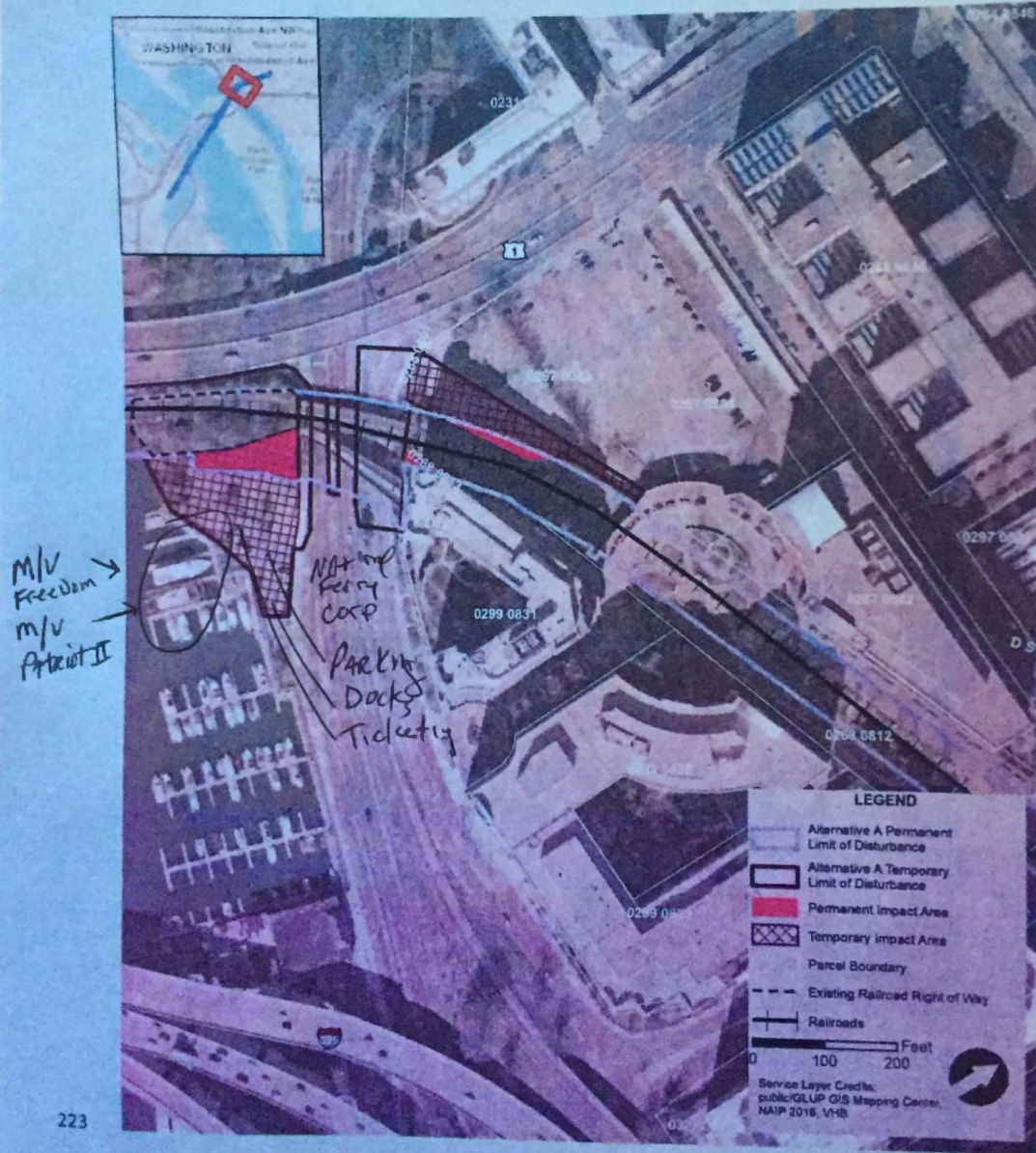
If wish to discuss any of the foregoing or desire any additional information, please feel free to contact me directly at 703.851-8644 or kmoran@nationalferry.com. Thank you.

Respectfully yours,

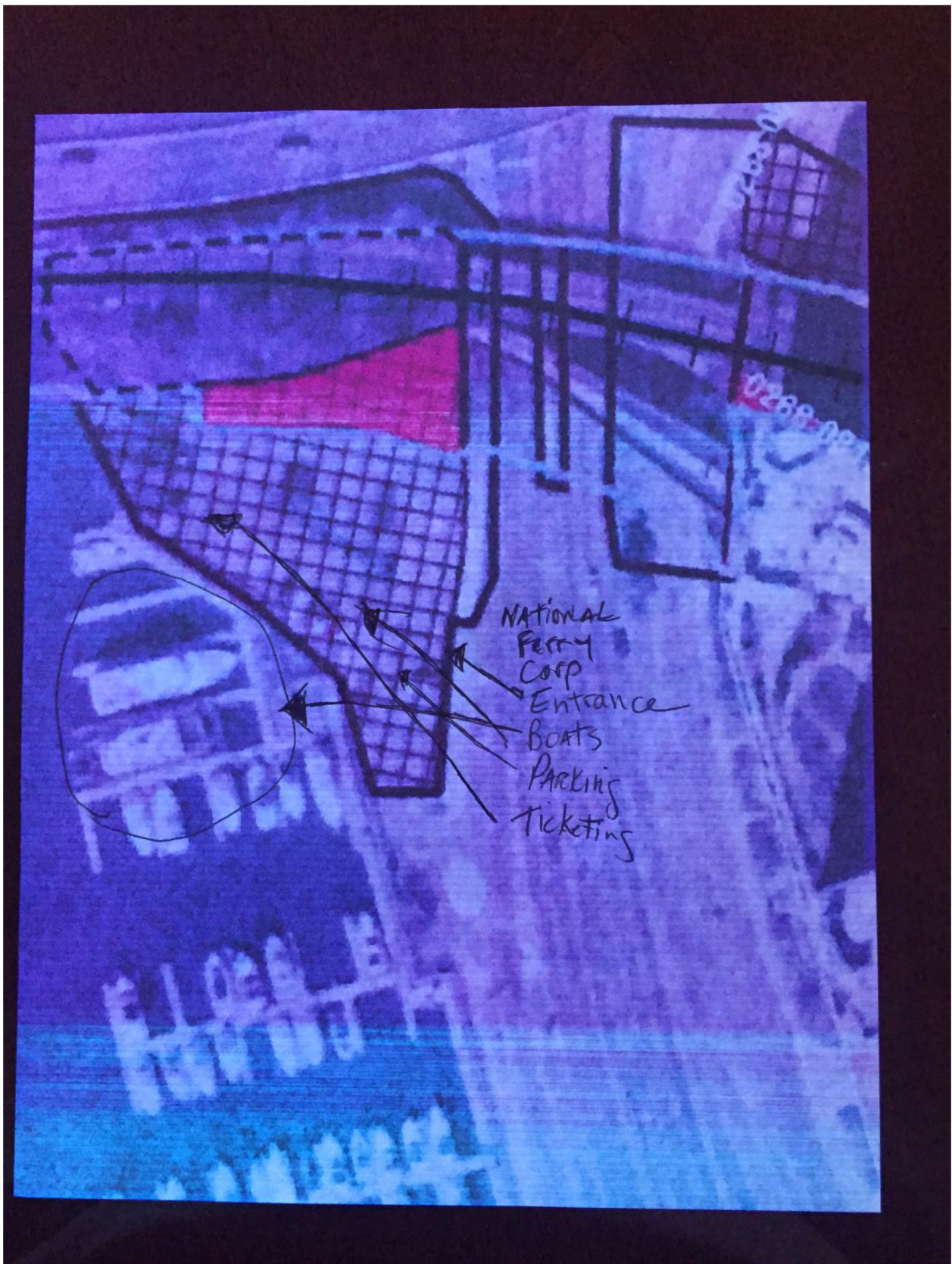
Kevin Moran
President & CEO
National Ferry Corporation

Cc: Mayor Murial Bowser

221 **Figure 12-9 | Permanent and Temporary Land Use and Property Impacts – Washington Marina and**
 222 **Portals Development (Action Alternative A)**



223



Farmer, Lee

From: Milazzo II, Joe <Joe@letsgetmoving.org>
Sent: Friday, October 25, 2019 11:52 PM
To: info@longbridgeproject.com
Cc: Chamberlin, Anna (DDOT)
Subject: [External] RTA (N.C.) comments on Long Bridge DEIS
Attachments: ref -- NCDOT - DEIS Comment Letter - FINAL SIGNED.pdf

TO:
Ms. Anna Chamberlin, AICP
Ref: Long Bridge Project
55 M Street, SE
Suite 400
Washington, DC 20003-3515

--

Dear Anna and colleagues,

Thank you for the opportunity to comment on the subject [DEIS for the Long Bridge project](#).

The Regional Transportation Alliance is the voice of the regional business community in the Research Triangle area of North Carolina, serving Raleigh, Durham, Chapel Hill, Cary, and nearby communities.

We recognize that [proposed improvements to the Long Bridge](#) are essential for improved rail travel between Washington, D.C. and the southern mid-Atlantic area, including Virginia and North Carolina.

We echo several of the comments submitted under separate cover by Mr. James Bridges with NCDOT (dated 10/24/19, **attached** for ease of reference), including a request for clarification and inclusion of the Raleigh-Richmond tier II environmental documents as well as the existing and proposed trains that extend into or through North Carolina.

We applaud the leadership of the District Department of Transportation and USDOT/FRA for coordinating this important study effort, which will better connect north and south through the nation's capital.

Please let me know if you have questions.

Joe

Joe Milazzo II, PE
Executive Director
Regional Transportation Alliance
The voice of the regional business community on transportation

w 919.664.7065
m 919.389.9285
joe@letsgetmoving.org

[Leadership Team](#) | [Chairs Council](#) | ["Thursday Thoughts at 3" blog](#)

October 25, 2019

Ms. Anna Chamberlin
District Department of Transportation
55 M Street, SE, Suite 400
Washington, DC

BY EMAIL

Re: Comments on Long Bridge Project Draft Environmental Impact Statement

Dear Ms. Chamberlin:

The Southern Environmental Law Center would like to provide the following comments on the Draft Environmental Impact Statement (DEIS) for the Long Bridge Project. SELC is a non-partisan, non-profit organization that works throughout the Southeast to promote transportation and land use decisions that strengthen our communities, protect our natural resources, and improve our quality of life. For over two decades, we have worked to advance policies and projects that enhance freight and passenger rail throughout our region.

The expansion of Long Bridge has been a primary focus of our recent rail advocacy efforts. The Long Bridge Project would alleviate a critical bottleneck in our region's rail network—the most severe bottleneck for freight and passenger rail service between North Carolina and Washington, DC. As the only railroad bridge connecting Virginia and Washington, DC, Long Bridge's two tracks currently serve all CSX freight, Amtrak, and Virginia Railway Express trains crossing the Potomac River between these jurisdictions. Significant increases in these services are planned for the coming years to meet growing demand,¹ which is almost certain to cause severe reliability, performance, and safety issues unless this facility is significantly upgraded.²

In addition to meeting future demands for rail service, the Long Bridge Project offers many other important economic and community benefits, including expanding travel and shipping options, mitigating traffic congestion in some of our region's most heavily-traveled corridors, reducing transportation-related emissions of greenhouse gases and other air pollutants, and encouraging more efficient land development patterns. Moreover, a number of these benefits could be augmented by the construction of the proposed new bicycle and pedestrian bridge running parallel to the project.

Despite the multiple benefits of the proposed project, Long Bridge is located in an area with significant environmental, historic, and community resources. Although the current Preferred Alternative will result in fewer impacts than the other Build Alternatives that have been studied, it is imperative that opportunities to further avoid and minimize impacts to these

¹ Federal Railroad Administration & District Department of Transportation, *Long Bridge Project Draft Environmental Impact Statement and Draft Section 4(f) Evaluation* at 2-4 to 2-5 (Sept. 2019) (hereinafter *Long Bridge DEIS*).

² *Id.* at 2-7 to 2-10.

resources are carefully considered and incorporated into the project as the design process continues. In addition, given the project's location along the Potomac River, we believe the DEIS's analysis of potential climate change-related impacts on the project and its surroundings should be strengthened. Analysis of the potential vulnerability and resiliency of the project to climate impacts is crucial to help ensure that Long Bridge will remain a viable transportation link well into the future.

Benefits of the Long Bridge Project

According to the DEIS, the proposed doubling of rail capacity will enable Long Bridge to accommodate an anticipated 153% increase in the number of trains using this facility each day—from 76 trains today to 192 trains per day in 2040.³ This includes significant increases planned for each of Long Bridge's commuter, passenger, and freight operators.⁴ Expanding these rail services can provide many important benefits, including enhancing mobility and reducing congestion along major highway corridors—such as I-66 and I-95 in Northern Virginia—by providing drivers with alternative travel options. Expanding these services will also contribute to Virginia's goals of shifting toward a cleaner transportation system.

Continued growth in the Washington region means there will be more demand for public transportation and intercity passenger rail services, and improvements to the Long Bridge corridor will allow for the expansion of existing, and the introduction of new, passenger rail service. These new and expanded services are expected to provide over \$17 million in annual travel time savings for rail passengers by 2040, and between \$24 and \$59 million in annual time savings for road users.⁵ Moreover, rail commuters currently contribute about \$6.25 billion annually to the region, and the expansion of Long Bridge is expected to double that contribution to over \$12 billion by 2040.⁶ The improvements to freight service will also allow for more efficient transport of goods in one of the nation's busiest transportation corridors.

Another key benefit of the enhanced rail service the Long Bridge Project would enable is the reduction in transportation-related emissions of greenhouse gases (GHG) and other air pollutants. The transportation sector is the largest source of carbon pollution both nationwide and in Virginia, and increasing rail's modal share would help to address this problem. As noted in the recent *Virginia Statewide Rail Plan*, railroads are on average four times more fuel efficient than trucks, with freight moved by rail generating 75% less GHG pollution.⁷ Although we were pleased to see that the DEIS addresses some GHG emissions that will result from the project,⁸ the analysis lacks an examination of the project's anticipated benefits in reducing GHG emissions by encouraging drivers to shift from highway use to take advantage of new passenger

³ *Id.* at 2-4 to 2-5.

⁴ By 2040, VRE service in the Long Bridge Corridor is expected to grow from 34 to 92 trains per day, Amtrak from 24 to 44 trains per day, and CSX from 18 to 42 trains per day. In addition, MARC plans to expand service to Alexandria, Virginia, which would introduce another 8 passenger trains per day to the corridor. Norfolk Southern also does not currently operate any trains in the Long Bridge Corridor, but expects to operate 6 trains per day. *Id.*

⁵ Randy Selleck, Virginia Department of Rail and Public Transportation, Presentation to the Commonwealth Transportation Board, "The Economic Impact of the Proposed Long Bridge Expansion and Associated Corridor Projects and the Role of Rail Commuting in the Economy" at 11 (Oct. 16, 2019).

⁶ *Id.* at 9.

⁷ Virginia Department of Rail and Public Transportation, *Virginia Statewide Rail Plan 2* (Dec. 6, 2017).

⁸ The DEIS provides analysis of the GHG emissions associated with construction and post-construction operations. *Long Bridge DEIS*, at App. D3, 7-3.

and freight rail services. These benefits can be further increased by designing the project so that it can easily accommodate, or be retrofitted to accommodate, future electrification of rail lines. The final EIS should include further analysis of this option, including preliminary cost estimates.

Preferred Alternative

The DEIS's proposed Preferred Alternative (Action Alternative A) to build a new two-track crossing appears to have a number of advantages over Action Alternative B (which also includes rebuilding the existing Long Bridge), as well as other Build Alternatives previously considered for the project. The Preferred Alternative would have fewer impacts on natural and community resources, largely due to its smaller footprint. And while the Preferred Alternative provides the same level of benefits as Action Alternative B, it has a much shorter construction timetable (approximately 5 years versus 8 years and 3 months) and a much lower price tag (an estimated \$1.9 billion versus \$2.8 billion).⁹ This means the benefits of the project will be available to the public more quickly and for a lower cost through the implementation of the Preferred Alternative, without compromising on the purpose and need of the project or increasing impacts to the surrounding environmental and community resources.

We also appreciate that the Preferred Alternative has been located and designed to minimize impacts to the significant resources in the vicinity of the project, such as Roaches Run Waterfowl Sanctuary, Long Bridge Park, East Potomac Park, and the George Washington Memorial Parkway. As this project moves forward, we encourage you to carefully consider further design changes and mitigation options to minimize any remaining impacts on these and other resources in the project area as part of the DEIS process and related historic and cultural resource reviews.

Climate Change and Resiliency

Given this project's location crossing the Potomac River, it is important that the Preferred Alternative be designed to ensure resiliency in the face of future climate change impacts. The project area falls largely within existing floodplains and in an area of the Potomac subject to storm surges and tidal changes.¹⁰ Although we are pleased to see that the Preferred Alternative has been designed to avoid impacts to natural resiliency features such as wetlands associated with the Roaches Run Waterfowl Sanctuary, we are concerned with the lack of analysis in the DEIS about anticipated future climate change effects in the project area. Among other things, this analysis could help inform additional design changes to ensure the project remains resilient to these effects and does not exacerbate the impacts of climate change on surrounding communities and resources. The final EIS should include such analysis.

Bicycle and Pedestrian Crossing

Finally, SELC continues to support the potential construction of a separate new bicycle and pedestrian bridge at this crossing. This new bridge would provide another important connection to the heavily-used trail networks on either side of the Potomac River, as well as a

⁹ *Id.*, 3-45 to 3-46.

¹⁰ *Id.* at 6-15 to 6-16. *See, e.g.*, National Oceanic and Atmospheric Administration, National Storm Surge Hazard Maps, available at <https://noaa.maps.arcgis.com/apps/MapSeries/index.html?appid=d9ed7904dbec441a9c4dd7b277935fad&entry=1>.

safer alternative to the popular existing crossings at the Key Bridge and the 14th Street Bridge.¹¹ It would also provide yet another travel option for residents and commuters in this densely populated area, contributing to further reductions in traffic congestion and transportation-related emissions of GHGs and other pollutants.

Thank you for your consideration of these comments, and we urge the federal, state, regional, and local entities involved in the Long Bridge Project to prioritize efforts to fund these critical improvements so that they can be promptly implemented once a Record of Decision is issued.

Sincerely,

Handwritten signature of Trip Pollard in black ink.

Trip Pollard
Senior Attorney

Handwritten signature of Carroll Courtenay in black ink.

Carroll Courtenay
Associate Attorney

¹¹ Bicycle advocates have long pushed for a crossing at this location due to the safety and traffic issues involved with the existing crossings at the Key Bridge and 14th Street Bridge. *See, e.g.*, Edward Russel, "The 14th Street Bridge Will Get Better For Cyclists, But First...Construction," DCIST (Sept. 15, 2018); Edward Russel, "To Bike Across the Potomac, Most Use the 14th Street Bridge or Key Bridge," GREATER GREATER WASHINGTON (Aug. 19, 2015); David Alpert & Adam Froehlig, "14th Street Bridge Area Needs a Good Bicycle Connection," GREATER GREATER WASHINGTON (Mar. 13, 2012).



WABA

WASHINGTON AREA
BICYCLIST ASSOCIATION

Oct. 28, 2018

District Department of Transportation (DDOT)
Attn: Anna Chamberlin, AICP
55 M St, SE
Washington, DC 20003

Dear Ms. Chamberlin,

Washington Area Bicyclist Association (WABA) strongly supports the bike-pedestrian crossing mitigation measure for the Long Bridge Project, as is included in the Draft Environmental Impact Statement (EIS). The bike-pedestrian crossing needs to remain part of the Long Bridge Project, be fully funded, and built in a timely manner.

The bike-pedestrian crossing will have beneficial effects by increasing access to parks and open spaces, improving personal mobility, increasing the connectivity of the active transportation network, improving public health, and advancing the transportation equity and environmental goals of DC, Arlington County, and the City of Alexandria. This is a once-in-a-generation opportunity to improve the connectivity between jurisdictions.

The Long Bridge bike-pedestrian crossing is also part of the regional trail network as defined by the Capital Trails Coalition and adopted by the Transportation Planning Board as one of the seven initiatives of Visualize 2045, the regional long-range transportation plan.

Thank you,

Katie Harris
Trails Coalition Manager
Washington Area Bicyclist Association



The Washington Marina Company
1300 Maine Avenue SW
Washington, DC 20024
202-554-0222
www.washingtonmarina.com

October 28, 2019

VIA EMAIL AND VIA USPS

Ms. Anna Chamberlin, AICP
Manager, Project Review Planning and Sustainability Division
District Department of Transportation - Long Bridge Project
55 M Street, SE
Suite 400
Washington, DC 20003

Re: Comments to September, 2019 Draft Environmental Impact Statement and Draft Section 4(F) Evaluation – Long Bridge Project

Dear Ms. Chamberlin:

While The Washington Marina Company (“WMC”) supports continued improvement to the infrastructure of our nation’s railways, WMC has a number of concerns about the DEIS and the conclusions therein, and the potential impact of the Long Bridge Project on WMC. Please accept this letter as the comments of The Washington Marina Company to the above-referenced draft Environmental Impact Statement and draft Section 4(f) Evaluation (DEIS). These comments are equally applicable to both the preferred Alternative Action A and Alternative Action B:

- (1) Interference with Pedestrian Access to WMC: The DEIS indicates the Project will include a proposed 4+ year closure of Maine Avenue pedestrian bridge, walkways and sidewalk, dramatically affecting pedestrian access to WMC and the Southwest Waterfront as a whole. The impacts include a doubling of pedestrian walk times from the Maine Ave. traffic circle to WMC. See Section 6.3 of the Environmental Consequences report [the “EC Report”] at Appendix D-3 of the DEIS.

While the construction of a new, ADA-compliant pedestrian ramp seems positive, we have seen first-hand that there is an existing set of steps and bridge leading to the Mandarin Hotel which is hardly used. Further, there was a handicapped stair lift installed when the steps were finished but it was hardly ever used and eventually removed because it was vandalized. The DEIS itself acknowledges that an elevator

in this location is out of service because it hasn't been maintained, and we have no reason to believe the use or maintenance will improve in the future. What the DEIS appears to ignore is that there is no direct ADA-accessible connection from the Mandarin Bridge into the Mandarin Hotel or the Portals. Mandarin guests have to have a room card to go through a locked gate and go up two flights of stairs to enter the Hotel and pedestrians wishing to go into the Portals have to go up two long flights of stairs to the main concourse area. What is the sense of putting in a ADA-accessible ramp on a portion of our property when there is no ADA accessible connection on the other side and the current Mandarin Bridge and steps are hardly used? This is a waste of taxpayer money;

- (2) Interference with Private/Police Vehicle Access to WMC: Similarly, the DEIS reflects that there will be intermittent traffic controls and lane closures (more specifically discussed in Sections 6.3.3.2 and 6.3.4.2 of the EC Report, including major temporary adverse impacts on traffic. The recited impacts include "direct impacts to public safety due to lane closures on Maine Avenue SW, which could inhibit or cause delays for police, fire, and emergency services." See Section 15.4.2.2. of the EC Report. With the expanding development of the Southwest Waterfront, and particularly its residential population, any steps which will impede police, fire or emergency services should be avoided by all reasonable means;
- (3) Interference with Public Transportation Access to WMC: The DEIS advises that the Project will create an adverse impact on Maine Avenue Metrobus, Loudoun County Transportation, and Potomac and Rappahannock Transit Commission bus service to Maine Avenue, SW. See Section 6.3.2.3 of the EC Report;
- (4) Interference with River Access to WMC: The DEIS states the Project will include periodic closure of the main navigation channel of the Potomac River. See discussion in Section 6.3.7.2 of the EC report. We anticipate this will lead mariners to avoid this area and WM for the 40-month anticipated duration of such potential closures, yet there is no mention of such impact in the DEIS; and
- (5) Interference with Visibility of WMC: Visibility of construction (including cranes and barges) and reduced visibility of the Washington Marina will both adversely impact the Washington Marina. Per Section 11.4.2.5 of the EC Report, "Construction activities would be highly visible, disrupting views from both lower elevations, such as the waterfront, and higher elevations, such as Maryland Avenue SW. Several views would be altered and, potentially, partially obstructed, including views from both the Maryland and Maine Avenues SW toward the monuments, toward and from the Washington Marina, and toward the Portals development from 14th and D Streets NW. This would reduce the cultural order of the visual environment in this area. Construction activities in these areas would cause temporary major adverse impacts to visual quality...."

In addition to the foregoing direct impacts to the public's ability to access WMC, the following additional matters adversely affecting the operation of WMC appear highly probable:

- (6) Vibration/noise resulting from construction activities. It does not appear from the DEIS that the effect of noise or vibration on WMC or the piers or sea walls forming part of the WMC facility does not appear to have been considered;
- (7) Additional piers (navigation obstructions) and sedimentation in the river, resulting in loss of habitat and potential impact on migratory species. A significant portion of the WMC's clientele is engaged in recreational fishing, so additional negative impacts on WMC's business are expected; and
- (8) Perhaps most importantly, the DEIS reflects several inconsistent references to scope and impact of temporary and permanent loss of parking at WMC. Per Section 6.3.5.2 of the EC Report, "Loss of surface parking at Washington Marina would be considered a major impact because it constitutes the entirety of the marina's parking" (see also, Section 9.4.1.2 of the report).

Characterization of a portion of this as "temporary" appears misleading as the 4+ year duration should reasonably be anticipated to lead to permanent loss of business to the Washington Marina as slip rentals likely shift to other marinas on a permanent basis. The EC Report later appears to acknowledge this when it recites in Section 14.4.2.2: "Temporary parking for Washington Marina would be established off site for the duration of construction (the location of temporary parking for the marina will be identified later in the planning process as final design progresses and in coordination with the marina). Construction would have a potentially major direct impact to Washington Marina considering both the temporary loss of parking and the inconvenience of the temporary removal of the pedestrian bridge for approximately 5 years. These impacts would be inconvenient for Washington Marina and its patrons and could result in the loss of patrons."

Section 12.4.1.2 of the DEIS incorrectly states this will not affect the function of the land use. This is patently untrue. First, WMC now understands we will temporarily lose our entire parking areas for construction staging as the Project is currently proposed. Nothing in the DEIS shows consideration of any alternative locations for construction staging.

Second, absent long-term parking for boat slip renters, rentals of the boat slips at Washington Marina will not be economically viable, rendering the slips provided at taxpayers' expense basically unusable. This appears to be acknowledged in Section 12.5.1.2, where the DEIS again characterizes such loss of parking as "major adverse direct impact, as temporary loss of parking would impact the use and operation of the business."

Further, approximately one-third of all Washington Marina parking would be permanently lost to relocation of the pedestrian bridge, as acknowledged in Section 6.2.5.2 of the EC Report (see also, Section 18.3.5.1, reflecting loss of 1/3 of such parking). In addition to servicing our recreational and commercial slip customers, the WMC west parking lot provides space for monthly parking and WMC derives significant revenue from these monthly contracts. We currently have approximately 85 parking customers for such spaces, the majority of which are government employees that work at the Treasury building, yet this does not appear to have been considered in the DEIS.

We also note that Section 9.3.1.2 of the EC Report has a different “take” on the impact on the WMC parking, stating “The reconstruction of the pedestrian ramp and the right-of-way needed for the additional tracks would result in minor adverse direct impacts on the western side of the Washington Marina parking lot, causing a loss or relocation of several parking spaces, but still allowing approximately 80 percent of the lot to continue to function as it does in the existing condition.” In section 14.3.2.2, the report states the Washington Marina “would permanently lose approximately 20 parking spaces out of 88 existing spaces [23%]. The exact number of spaces to be removed, and the exact impacts to Washington Marina, would be determined as final design advances and through further coordination with Washington Marina. The loss of parking spaces would constitute a moderate direct adverse impact on Washington Marina without mitigation measures. It is anticipated that with mitigation measures, including reconfiguration of the existing surface parking area after the replacement pedestrian bridge is constructed, the net loss of parking spaces would be negligible.” For WMC, the loss of even 20 parking spaces used for long-term boat slip renters is likely to erase the profitability of such operations.

Any loss of parking, temporary or permanent would have a devastating impact, not only to our business, but also to the three riverboat companies that currently rent dock space from WMC. If this Project moves forward with taking the WMC parking, we estimate that this alone will cause the loss of 40-50 jobs as a result.

We find it incomprehensible that evaluation of the Project has been going on for years but we were not informed until March, 2019 that a portion of our parking lot would be affected (and then we were led to believe this was only due to the construction of a new pedestrian ramp, not a 4-5 year taking of the parking). It seems clear to us that analysis of the ramifications of taking WMC parking is both incomplete and inconsistent.

Beyond the WMC itself, the DEIS details a variety of impacts to the community at large. Of particular note is the failure of Alternative Actions A or B to comply with the NCPC Extending the Legacy and the Monumental Core Framework Plan, the Federal Elements of the Comprehensive Plan of the National Capital, and the Southwest Ecodistrict Plan, each of which recommend decking over the existing CSXT railroad tracks to enhance

the streetscape, allow for the creation of new development parcels, and restore views along Maryland Avenue SW.

In addition, “Yacht Basin One”, established by President Roosevelt and the first model marina in Washington, DC, has been home to the Washington Marina Company since 1951 and the facility in continuous operation since 1941. Neither the historical basis, nor the long-term dedication to this use appears to have been properly considered.

Finally, we note Section 14.5.2 of the EC Report states “The Virginia Department of Rail and Public Transportation, the project sponsor for final design and construction, would *continue* to coordinate with the Washington Marina and NPS to develop appropriate mitigation for adverse temporary and permanent impacts, including potential loss of revenue and patrons due to the temporary and permanent removal of parking, to these establishments due to the Project” (emphasis added). To date, we are unaware of any effort by DRPT to contact the Washington Marina regarding such mitigation for parking or any of the other impacts cited above. Indeed, it does not appear to use that any alternative approaches to minimize such impacts have been considered. This appears to be contrary to both the spirit and letter of the NEPA process.

If you have any questions or concerns regarding this matter, please contact me.

Very truly yours,

THE WASHINGTON MARINA COMPANY

By: _____



R.L. (“Bob”) Stickell,
President and General Manager

October 28, 2019

Ms. Anna Chamberlin, AICP
Long Bridge Project
55 M Street, SE -- Suite 400
Washington, DC 20003-3515
info@longbridgeproject.com

Dear Ms. Chamberlin:

On behalf of the board of directors and members of Virginians for High Speed Rail (VHSR), I am submitting our public comments pertaining to the Draft Environmental Impact Statement for the Long Bridge expansion project.

Simply put, this project is vital to the sustainability, connectivity, and mobility of millions of Virginians who travel along the I-95 corridor every day. VHSR encourages this project to move forward in an expedited manner.

We strongly support "Action Alternative A" to expand the crossing to four tracks because this alternative is 32 percent cheaper than Alternative B, it can be completed over 3 years sooner, and it has far less impact on our environment. We also believe that there needs to be a continued effort to avoid natural and community resources in the project area where feasible.

Expanding the Long Bridge will allow for the addition of 12 Virginia Amtrak Regional trains, 66 commuter rail trains, eight Southeast Regional trains; adding to the 24 Amtrak trains that use Long Bridge and the Washington to Richmond corridor today. These additional intercity and commuter rail trains will take over 689 million passenger miles off our roads, eliminate the need to burn 20.2 million gallons of gas, and prevent the release of over 180,000 metric tons of greenhouse gas emissions every year. This project will also greatly benefit our economy. The construction of this project will generate \$2.9 billion in economic benefits for the Commonwealth and over \$306 million annually in total output from the increased intercity and commuter rail service which will create/sustain thousands of jobs.

Our primary requests are to make sure that the new Long Bridge corridor is engineered for electrification and to provide cost estimates to electrify the segment in the final EIS.

If I can be of any further assistance, please let me know.

Regards,


Danny Plaughter
Executive Director