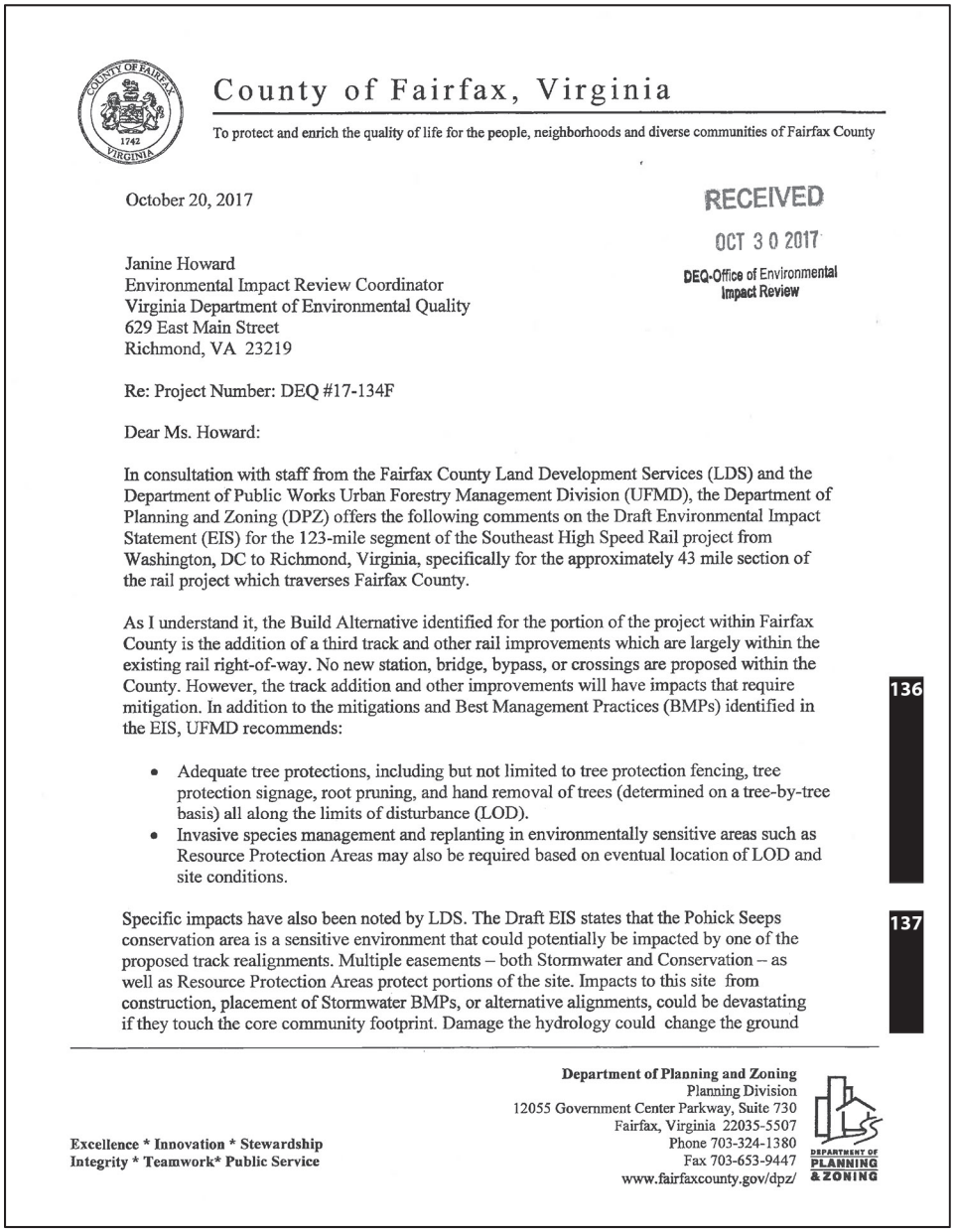

County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

October 20, 2017

RECEIVED
OCT 3 0 2017
DEQ-Office of Environmental Impact Review

Janine Howard
Environmental Impact Review Coordinator
Virginia Department of Environmental Quality
629 East Main Street
Richmond, VA 23219

Re: Project Number: DEQ #17-134F

Dear Ms. Howard:

In consultation with staff from the Fairfax County Land Development Services (LDS) and the Department of Public Works Urban Forestry Management Division (UFMD), the Department of Planning and Zoning (DPZ) offers the following comments on the Draft Environmental Impact Statement (EIS) for the 123-mile segment of the Southeast High Speed Rail project from Washington, DC to Richmond, Virginia, specifically for the approximately 43 mile section of the rail project which traverses Fairfax County.

As I understand it, the Build Alternative identified for the portion of the project within Fairfax County is the addition of a third track and other rail improvements which are largely within the existing rail right-of-way. No new station, bridge, bypass, or crossings are proposed within the County. However, the track addition and other improvements will have impacts that require mitigation. In addition to the mitigations and Best Management Practices (BMPs) identified in the EIS, UFMD recommends: 136

- Adequate tree protections, including but not limited to tree protection fencing, tree protection signage, root pruning, and hand removal of trees (determined on a tree-by-tree basis) all along the limits of disturbance (LOD).
- Invasive species management and replanting in environmentally sensitive areas such as Resource Protection Areas may also be required based on eventual location of LOD and site conditions.

Specific impacts have also been noted by LDS. The Draft EIS states that the Pohick Seeps conservation area is a sensitive environment that could potentially be impacted by one of the proposed track realignments. Multiple easements – both Stormwater and Conservation – as well as Resource Protection Areas protect portions of the site. Impacts to this site from construction, placement of Stormwater BMPs, or alternative alignments, could be devastating if they touch the core community footprint. Damage the hydrology could change the ground 137

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Planning Division
12055 Government Center Parkway, Suite 730
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Fax 703-653-9447
www.fairfaxcounty.gov/dpz/

DEPARTMENT OF PLANNING & ZONING

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VIRGINIA DEQ (continued)

136. As indicated in Section 5.10.1.4 of the Final EIS, minimization and mitigation measures could include minimizing clearing and grubbing (including tree removal), development of a mitigation plan that includes landscaping and planting detail for onsite replacement of any trees removed, and native revegetation, including native shrub plantings and native reseeding of disturbed areas to prevent the spread of invasive species. Construction contract documents will include appropriate measures to protect trees along the limits of disturbance. These minimization and mitigation measures will be applicable to all vegetation communities within the limits of disturbance, not just environmentally sensitive areas.

137. Fairfax County submitted comments directly to DRPT on November 6, 2017, which included comments on Pohick Seeps; refer to Fairfax County's letter, which is included as part of the agency responses in the Final EIS, for DRPT responses to their comments.

Janine Howard
October 20, 2017
Page 2

water base flow conditions, cause excessive surface flow with erosion and deposition of sediment, or fragmentation which could in turn result in changes to the plant community structure. Conversion of the community would be almost impossible to mitigate since these mid-Atlantic coastal plain seepage communities are specific to geography and soils and take decades or centuries to develop. 137

The rail project should continue to coordinate with the Fairfax County Stormwater Planning Division as the primary agency for resource condition and impact assessment. In addition, coordination with Virginia Natural Heritage Program is also recommended to address mitigation, restoration, federal regulatory compliance and other related areas. The UFMD should also be included for review, of canopy and forest stand valuation and regulatory enforcement in terms of local and state codes. In terms of land rights, the Fairfax County Facilities Management Division is the land manager and the Fairfax County Land Acquisition Division would need to guide the legal aspects of the easements and property rights of the Pohick Seeps. More specific information is needed regarding the LOD for the project as a whole and the design(s) and placement of stormwater management facilities. Comments from the Fairfax County Park Authority are provided under separate cover. 138

Thank you for the opportunity to provide comments regarding this important project. If you have any questions about our comments, please do not hesitate to contact Erin M. Haley of my staff at 703-324-1380.

Sincerely,

Marianne Gardner

Marianne Gardner, Director, Planning Division
Department of Planning and Zoning

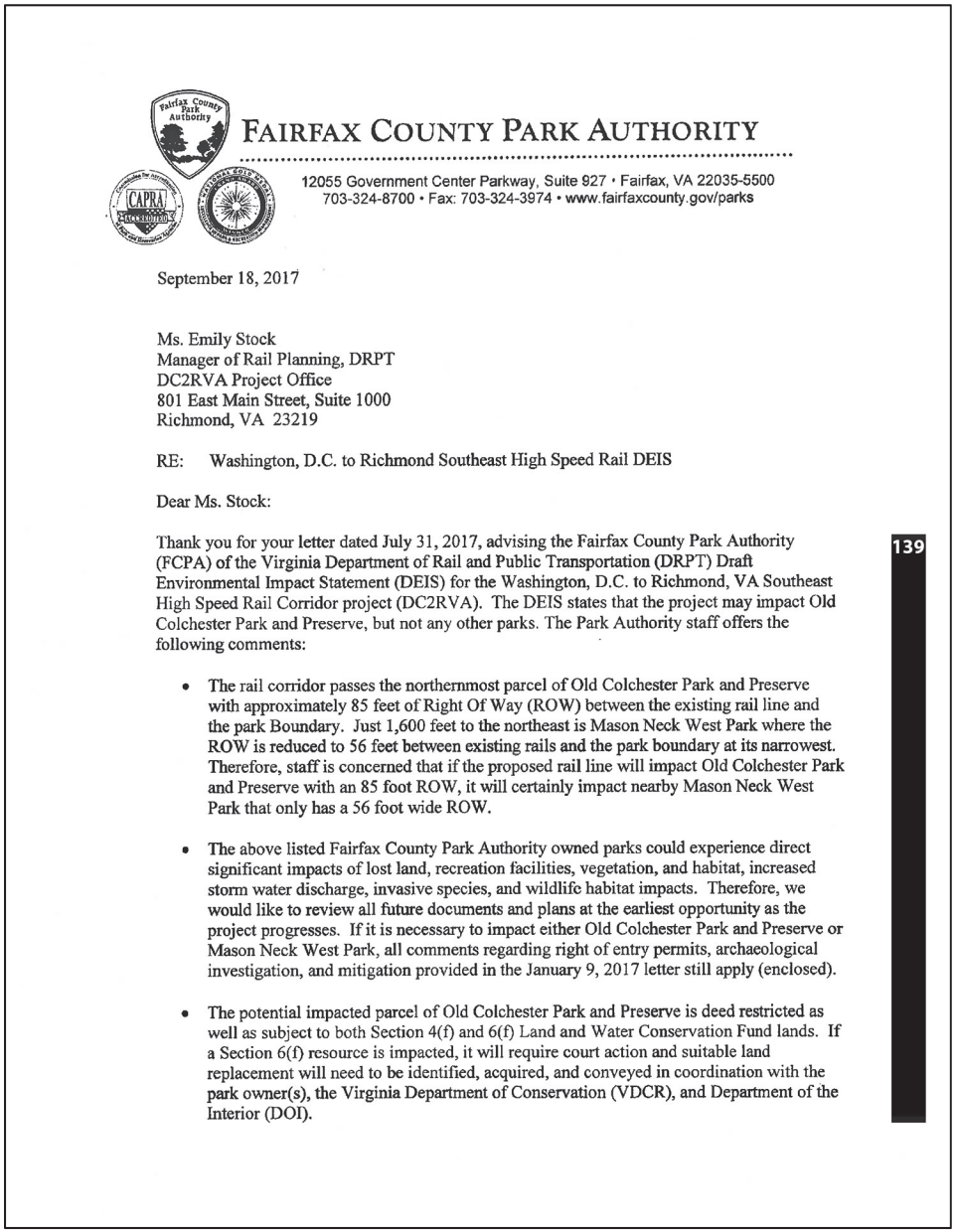
MG: EMH

cc:
Board of Supervisors
Kirk Kincannon, Acting County Executive
Robert A. Stalzer, Deputy County Executive
Fred Selden, Director, DPZ
Denise James, Chief, Environment and Development Review Branch, DPZ
Shannon Curtis, Watershed Planning and Assessment Branch, LDS
Erin M. Haley, DPZ
Andrea Dorlester, Fairfax County Park Authority
Leonard Wolfenstein, Fairfax County Department of Transportation

VIRGINIA DEQ (continued)

(Response to comment 137 on previous page)

138. DRPT will continue to coordinate with federal, state, and local agencies, including Fairfax County, during final design and Project permitting, in accordance with federal, state, and local laws and regulations.



FAIRFAX COUNTY PARK AUTHORITY

12055 Government Center Parkway, Suite 927 • Fairfax, VA 22035-5500
703-324-8700 • Fax: 703-324-3974 • www.fairfaxcounty.gov/parks

September 18, 2017

Ms. Emily Stock
Manager of Rail Planning, DRPT
DC2RVA Project Office
801 East Main Street, Suite 1000
Richmond, VA 23219

RE: Washington, D.C. to Richmond Southeast High Speed Rail DEIS

Dear Ms. Stock:

Thank you for your letter dated July 31, 2017, advising the Fairfax County Park Authority (FCPA) of the Virginia Department of Rail and Public Transportation (DRPT) Draft Environmental Impact Statement (DEIS) for the Washington, D.C. to Richmond, VA Southeast High Speed Rail Corridor project (DC2RVA). The DEIS states that the project may impact Old Colchester Park and Preserve, but not any other parks. The Park Authority staff offers the following comments:

139

- The rail corridor passes the northernmost parcel of Old Colchester Park and Preserve with approximately 85 feet of Right Of Way (ROW) between the existing rail line and the park Boundary. Just 1,600 feet to the northeast is Mason Neck West Park where the ROW is reduced to 56 feet between existing rails and the park boundary at its narrowest. Therefore, staff is concerned that if the proposed rail line will impact Old Colchester Park and Preserve with an 85 foot ROW, it will certainly impact nearby Mason Neck West Park that only has a 56 foot wide ROW.

- The above listed Fairfax County Park Authority owned parks could experience direct significant impacts of lost land, recreation facilities, vegetation, and habitat, increased storm water discharge, invasive species, and wildlife habitat impacts. Therefore, we would like to review all future documents and plans at the earliest opportunity as the project progresses. If it is necessary to impact either Old Colchester Park and Preserve or Mason Neck West Park, all comments regarding right of entry permits, archaeological investigation, and mitigation provided in the January 9, 2017 letter still apply (enclosed).

- The potential impacted parcel of Old Colchester Park and Preserve is deed restricted as well as subject to both Section 4(f) and 6(f) Land and Water Conservation Fund lands. If a Section 6(f) resource is impacted, it will require court action and suitable land replacement will need to be identified, acquired, and conveyed in coordination with the park owner(s), the Virginia Department of Conservation (VDCR), and Department of the Interior (DOI).

VIRGINIA DEQ (continued)

139. Fairfax County submitted comments directly to DRPT on November 6, 2017, which included these same topics on Parks; refer to Fairfax County's letter, which is included as part of the agency responses in the Final EIS, for DRPT responses to their comments.

Ms. Emily Stock
DC2RVA Draft EIS Recommendations
September 18, 2017
Page 2

- Requests for land rights on Park Authority owned property are necessary in order to perform any surveying, test boring, wetland flagging, utility relocation, clearing, grading, construction or other activity, even within an easement of any sort. Please advise any contractors and subcontractors of this requirement. The applicant must first acquire a Right of Entry License, Easement and / or Construction Permit from the Easement Coordinator, Fairfax County Park Authority, Planning and Development Division, 12055 Government Center Parkway, Suite 406, Fairfax, Virginia 22035. The main telephone number is (703) 324-8741. Because of restrictive covenants on some of the Park Authority properties, it may not be possible to approve easements on the park property. Conditions and/or fees may be required for Park Authority permits or easements.

- There is a high potential for impacts to numerous Native American, Historical, and Environmental resources within Old Colchester Park that should be incorporated into the scope of work. The Park Authority will require consultation with the Virginia Department of Heritage Resource (VDHR), as will any federal permitting or funding which will trigger Section 106.

- As this is a known historic site, the Park Authority will require a Phase I archaeological survey. If significant sites are found, Phase II archaeological testing is recommended in order to determine if sites are eligible for inclusion on the National Register of Historic Places. If sites are found eligible, avoidance or Phase III archaeological data recovery is recommended.

- To ensure that the project keeps moving forward with the least disturbance to parkland, the Park Authority requests to review all future plans as soon as they are available.

Our point of contact for this project is Andy Galusha, Senior Landscape Architect, who can be reached at 703-324-8755 or Andrew.Galusha@fairfaxcounty.gov. Thank you for the opportunity to comment on this EIS scope. We look forward to participating in the study as it moves forward.

Sincerely,

Sara Baldwin, Acting Executive Director

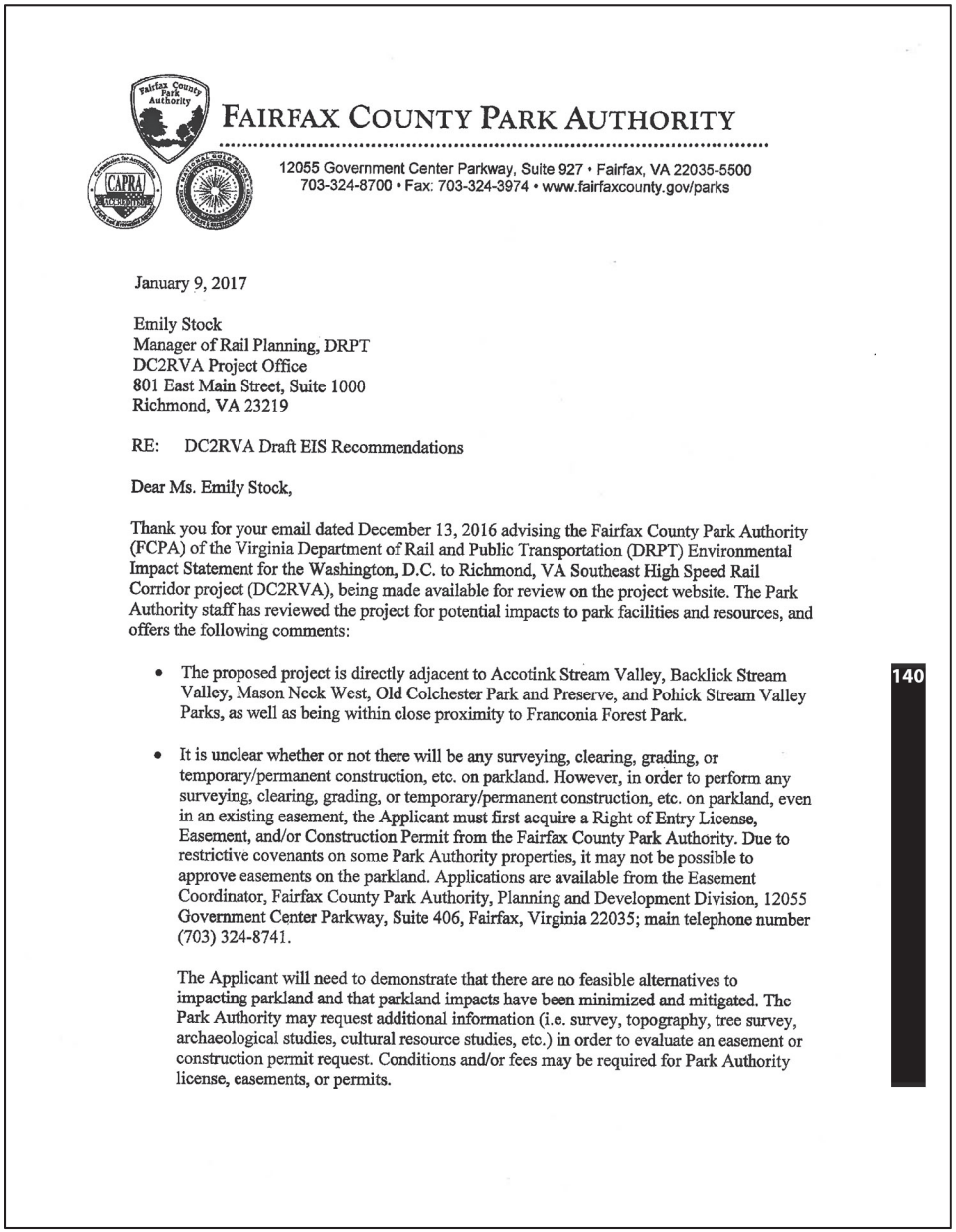
Enclosure

E-copy: Sara Baldwin, Deputy Director/COO
David Bowden, Director, Planning & Development Division (PDD)
Andrea L. Dorlester, AICP, Manager, Park Planning Branch, PDD
Andy Galusha, Senior Landscape Architect, PDD
Cindy Walsh, Director, Resource Management Division (RMD)
Elizabeth Crowell, Ph.D., Manager, Archaeology & Collections Branch, RMD
John Stokely, Manager, Natural Resources Management & Protection Branch, RMD

139

VIRGINIA DEQ (continued)

(Response to comment 139 on previous page)



FAIRFAX COUNTY PARK AUTHORITY

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703-324-8700 • Fax: 703-324-3974 • www.fairfaxcounty.gov/parks

January 9, 2017

Emily Stock
Manager of Rail Planning, DRPT
DC2RVA Project Office
801 East Main Street, Suite 1000
Richmond, VA 23219

RE: DC2RVA Draft EIS Recommendations

Dear Ms. Emily Stock,

Thank you for your email dated December 13, 2016 advising the Fairfax County Park Authority (FCPA) of the Virginia Department of Rail and Public Transportation (DRPT) Environmental Impact Statement for the Washington, D.C. to Richmond, VA Southeast High Speed Rail Corridor project (DC2RVA), being made available for review on the project website. The Park Authority staff has reviewed the project for potential impacts to park facilities and resources, and offers the following comments:

- The proposed project is directly adjacent to Accotink Stream Valley, Backlick Stream Valley, Mason Neck West, Old Colchester Park and Preserve, and Pohick Stream Valley Parks, as well as being within close proximity to Franconia Forest Park.

- It is unclear whether or not there will be any surveying, clearing, grading, or temporary/permanent construction, etc. on parkland. However, in order to perform any surveying, clearing, grading, or temporary/permanent construction, etc. on parkland, even in an existing easement, the Applicant must first acquire a Right of Entry License, Easement, and/or Construction Permit from the Fairfax County Park Authority. Due to restrictive covenants on some Park Authority properties, it may not be possible to approve easements on the parkland. Applications are available from the Easement Coordinator, Fairfax County Park Authority, Planning and Development Division, 12055 Government Center Parkway, Suite 406, Fairfax, Virginia 22035; main telephone number (703) 324-8741.

  The Applicant will need to demonstrate that there are no feasible alternatives to impacting parkland and that parkland impacts have been minimized and mitigated. The Park Authority may request additional information (i.e. survey, topography, tree survey, archaeological studies, cultural resource studies, etc.) in order to evaluate an easement or construction permit request. Conditions and/or fees may be required for Park Authority license, easements, or permits.

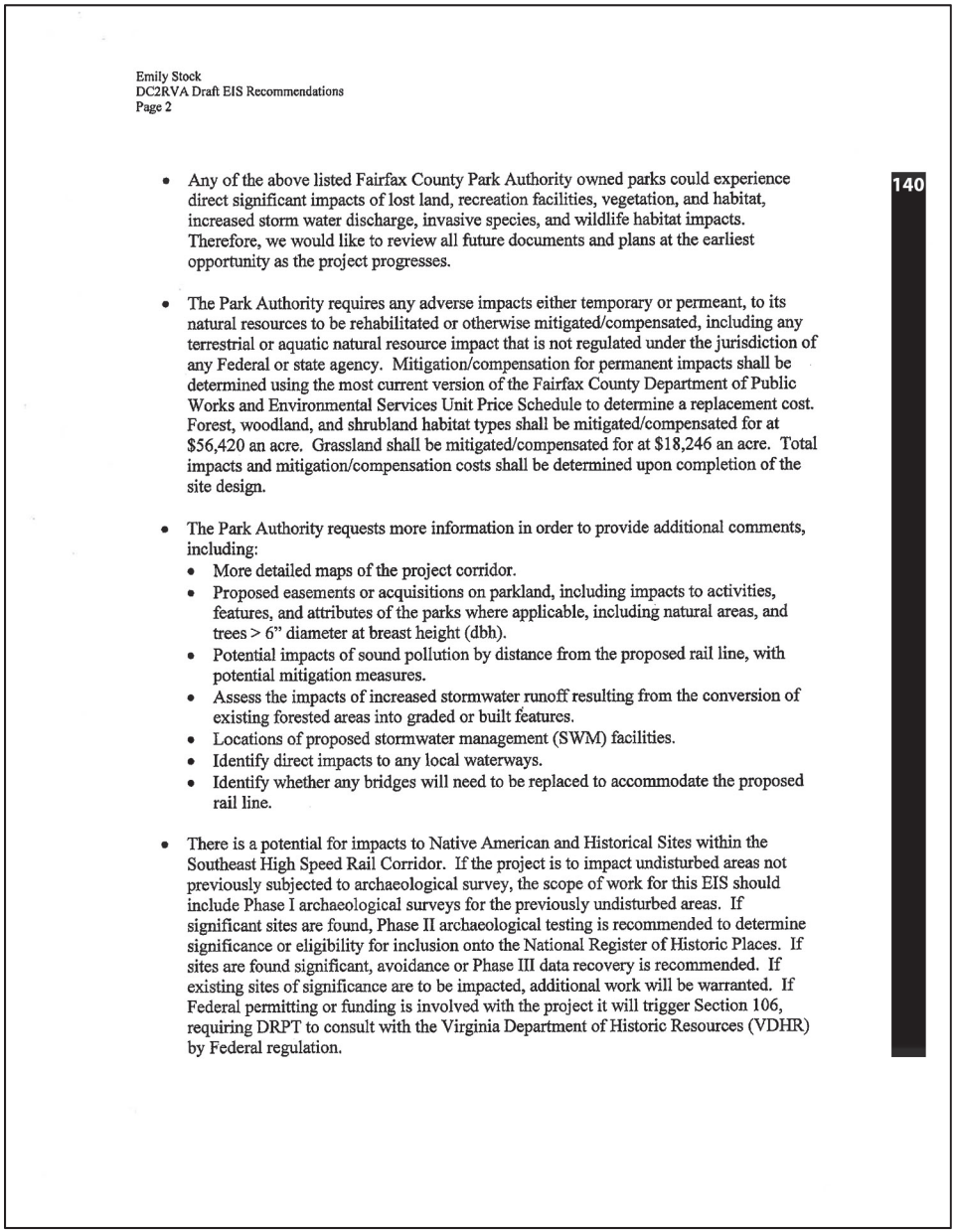
140

VIRGINIA DEQ (continued)

140. This letter was provided to DRPT after the preliminary alternative recommendations were made to the Commonwealth Transportation Board in December of 2016, which was ten months prior to the publication of the Draft EIS (on September 8, 2017), and are not specific comments on the content of the Draft EIS. Between receiving this letter and publishing the Draft EIS, DRPT coordinated with Fairfax County, and their comments, including those contained within this letter, are addressed in the analyses and documentation included in the Draft EIS. Detailed mapping of the Project corridor was included in Appendices C through H of the Draft EIS. There will be no acquisitions or easements on Fairfax County Park Authority lands.

    The Project requires compliance with the National Historic Preservation Act of 1966. Since 2014, DRPT has been complying with this legislation, including Project initiation, determination of an area of potential effects (APE), reconnaissance archaeological studies with predictive model, and architectural identification- and evaluation-level surveys of the APE. All studies have been coordinated with DHR and details on these studies and the ensuing coordination can be found in Final EIS Appendix D. National Register of Historic Places (NRHP)-eligible resources recorded to date in the Project APE in Fairfax County include the RF&P Railroad Corridor, Mount Vernon Parkway, Old Colchester Road and Colchester Arms. The FRA has determined that the Project will have an adverse effect on the RF&P Railroad Corridor, no adverse effect on the Mount Vernon Parkway and Colchester Arms, and no effect on Old Colchester Road. The DHR concurred with these determinations. Steps that will be taken to mitigate the adverse effects to the RF&P Railroad Corridor have been outlined in the Section 106 Draft Memorandum of Agreement (Appendix K of the Final EIS).

(Responses are continued on next page)



Emily Stock
DC2RVA Draft EIS Recommendations
Page 2

140

- Any of the above listed Fairfax County Park Authority owned parks could experience direct significant impacts of lost land, recreation facilities, vegetation, and habitat, increased storm water discharge, invasive species, and wildlife habitat impacts. Therefore, we would like to review all future documents and plans at the earliest opportunity as the project progresses.

- The Park Authority requires any adverse impacts either temporary or permeant, to its natural resources to be rehabilitated or otherwise mitigated/compensated, including any terrestrial or aquatic natural resource impact that is not regulated under the jurisdiction of any Federal or state agency. Mitigation/compensation for permanent impacts shall be determined using the most current version of the Fairfax County Department of Public Works and Environmental Services Unit Price Schedule to determine a replacement cost. Forest, woodland, and shrubland habitat types shall be mitigated/compensated for at $56,420 an acre. Grassland shall be mitigated/compensated for at $18,246 an acre. Total impacts and mitigation/compensation costs shall be determined upon completion of the site design.

- The Park Authority requests more information in order to provide additional comments, including:
  - More detailed maps of the project corridor.
  - Proposed easements or acquisitions on parkland, including impacts to activities, features, and attributes of the parks where applicable, including natural areas, and trees > 6" diameter at breast height (dbh).
  - Potential impacts of sound pollution by distance from the proposed rail line, with potential mitigation measures.
  - Assess the impacts of increased stormwater runoff resulting from the conversion of existing forested areas into graded or built features.
  - Locations of proposed stormwater management (SWM) facilities.
  - Identify direct impacts to any local waterways.
  - Identify whether any bridges will need to be replaced to accommodate the proposed rail line.

- There is a potential for impacts to Native American and Historical Sites within the Southeast High Speed Rail Corridor. If the project is to impact undisturbed areas not previously subjected to archaeological survey, the scope of work for this EIS should include Phase I archaeological surveys for the previously undisturbed areas. If significant sites are found, Phase II archaeological testing is recommended to determine significance or eligibility for inclusion onto the National Register of Historic Places. If sites are found significant, avoidance or Phase III data recovery is recommended. If existing sites of significance are to be impacted, additional work will be warranted. If Federal permitting or funding is involved with the project it will trigger Section 106, requiring DRPT to consult with the Virginia Department of Historic Resources (VDHR) by Federal regulation.

VIRGINIA DEQ (continued)

Specifically related to subsurface impacts, DRPT carefully evaluated the archaeological APE throughout the corridor, including Fairfax County. Based on DRPT's predictive model and Project plans in the county, no impacts are planned outside of CSXT right-of-way in areas that have the potential to contain archaeological sites. Details on this mapping were discussed with the Fairfax County Parks Authority (FCPA) via telephone and email in October 2015 and careful attention has been rendered to assure that no changes to the area of impact have been made that require additional archaeological study.

Thank you for the opportunity to comment on this EIS scope. We look forward to participating in the study as it moves forward. Our point of contact for this project is Andy Galusha, Park Planner, who can be reached at 703-324-8755 or Andrew.Galusha@fairfaxcounty.gov. 140

Sincerely,

Andrea L. Dorlester, AICP, Manager
Park Planning Branch
Planning and Development Division

cc: Cindy Walsh, Director, Resource Management Division
Elizabeth Crowell, Ph.D, Manager, Cultural Resources Management & Protection Branch
John Stokely, Manager, Natural Resources Management & Protection Branch

VIRGINIA DEQ (continued)

(Response to comment 140 on previous page)

Howard, Janine (DEQ)

From: Erik Nelson <enelson@fredericksburgva.gov>
Sent: Tuesday, September 12, 2017 3:34 PM
To: Howard, Janine (DEQ)
Subject: RE: DEIS for rail project

Ms. Howard,
Thanks for your quick response. Our schedule is going to be dictated by our City Council's schedule. We are going to brief them in September and ask them to take action on some specific mitigation factors in October. We thought we would submit them directly to the federal agency, but we can certainly keep you apprised of what we do as well. 141

Erik F. Nelson
Transportation Administrator
City of Fredericksburg
540 372-1080

From: Howard, Janine (DEQ) [mailto:Janine.Howard@deq.virginia.gov]
Sent: Tuesday, September 12, 2017 3:24 PM
To: Erik Nelson
Subject: FW: DEIS for rail project

Good Afternoon Mr. Nelson,

The DEQ Office of Environmental Impact Review received a copy of the DEIS for the DC to Richmond High Speed Rail project yesterday and is performing a coordinated review of the document in accordance with Virginia Code § 10.1-1183 which requires us to coordinate the Commonwealth's response to documents submitted under the National Environmental Policy Act. Our process is outlined at the following webpage: http://www.deq.virginia.gov/Programs/EnvironmentalImpactReview/NEPADocumentReviews.aspx.

We will submit a report of the Commonwealth's comments to the Federal Railroad Administration by the November 7, 2017 that the federal agency has set. As part of the coordinated review DEQ requests comments from affected localities and regional planning district commissions which is why the City Manager received an email from us today (attached). In order to allow us time to finalize our report we typically request comments back in 30 days. If you would like your comments included in the Commonwealth's report and need more time, I am happy to work with you and will continue to accept comments up until a few days before the report is finalized. You can also opt to send your comments to the federal agency directly.

Please feel free to reach out with any additional questions you may have.

Janine Howard
Environmental Impact Review Coordinator

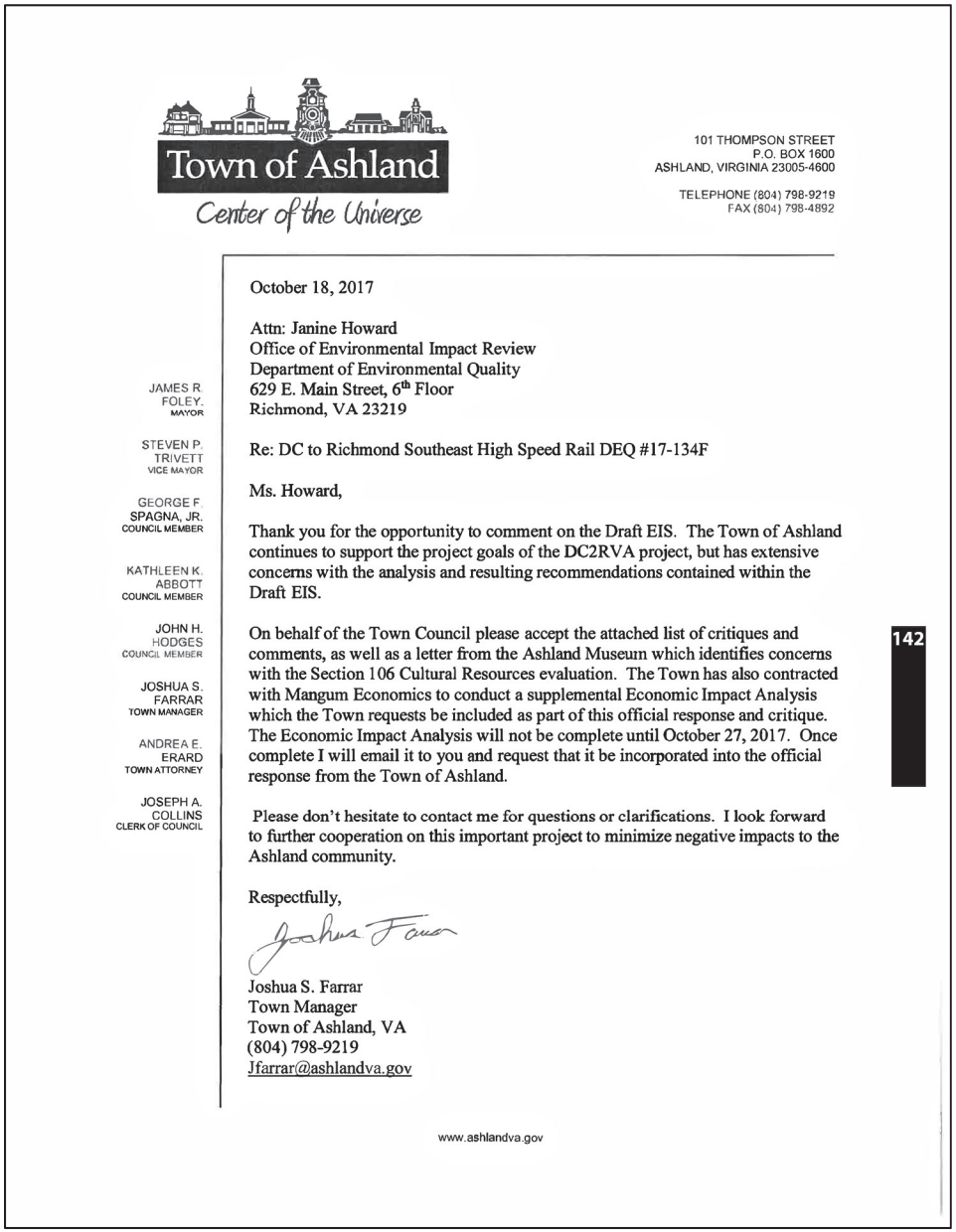
Office of Environmental Impact Review
Division of Environmental Enhancement
Virginia Department of Environmental Quality
629 E. Main Street
Richmond, VA 23219

t: (804) 698-4299
f: (804) 698-4032

1

VIRGINIA DEQ (continued)

141. The City of Fredericksburg submitted comments directly to DRPT; refer to the City's letter, which is included as part of the agency responses in the Final EIS, for DRPT responses to their comments.



Town of Ashland
Center of the Universe

101 THOMPSON STREET
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TELEPHONE (804) 798-9219
FAX (804) 798-4892

JAMES R. FOLEY, MAYOR
STEVEN P. TRIVETT, VICE MAYOR
GEORGE F. SPAGNA, JR., COUNCIL MEMBER
KATHLEEN K. ABBOTT, COUNCIL MEMBER
JOHN H. HODGES, COUNCIL MEMBER
JOSHUA S. FARRAR, TOWN MANAGER
ANDREA E. ERARD, TOWN ATTORNEY
JOSEPH A. COLLINS, CLERK OF COUNCIL

October 18, 2017

Attn: Janine Howard
Office of Environmental Impact Review
Department of Environmental Quality
629 E. Main Street, 6th Floor
Richmond, VA 23219

Re: DC to Richmond Southeast High Speed Rail DEQ #17-134F

Ms. Howard,

Thank you for the opportunity to comment on the Draft EIS. The Town of Ashland continues to support the project goals of the DC2RVA project, but has extensive concerns with the analysis and resulting recommendations contained within the Draft EIS.

On behalf of the Town Council please accept the attached list of critiques and comments, as well as a letter from the Ashland Museum which identifies concerns with the Section 106 Cultural Resources evaluation. The Town has also contracted with Mangum Economics to conduct a supplemental Economic Impact Analysis which the Town requests be included as part of this official response and critique. The Economic Impact Analysis will not be complete until October 27, 2017. Once complete I will email it to you and request that it be incorporated into the official response from the Town of Ashland.

Please don't hesitate to contact me for questions or clarifications. I look forward to further cooperation on this important project to minimize negative impacts to the Ashland community.

Respectfully,

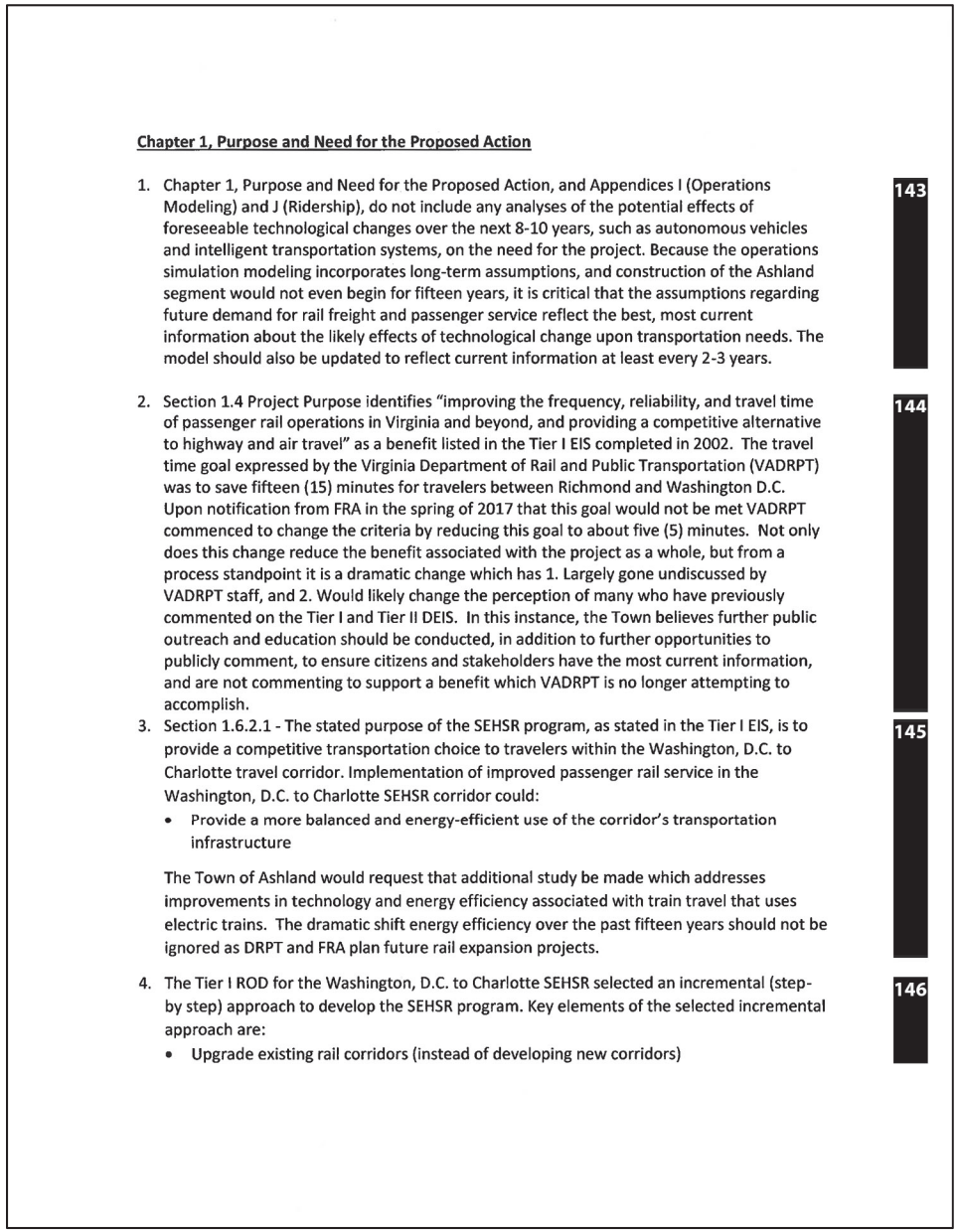
Joshua S. Farrar
Town Manager
Town of Ashland, VA
(804) 798-9219
Jfarrar@ashlandva.gov

www.ashlandva.gov

142

VIRGINIA DEQ (continued)

142. DRPT has reviewed all attachments provided by Town of Ashland, including the Ashland Museum and Mangum Economics report, and responded to comments within each attachment; refer to DRPT-numbered statements #143 through #236.



Chapter 1, Purpose and Need for the Proposed Action

1. Chapter 1, Purpose and Need for the Proposed Action, and Appendices I (Operations Modeling) and J (Ridership), do not include any analyses of the potential effects of foreseeable technological changes over the next 8-10 years, such as autonomous vehicles and intelligent transportation systems, on the need for the project. Because the operations simulation modeling incorporates long-term assumptions, and construction of the Ashland segment would not even begin for fifteen years, it is critical that the assumptions regarding future demand for rail freight and passenger service reflect the best, most current information about the likely effects of technological change upon transportation needs. The model should also be updated to reflect current information at least every 2-3 years. 143

2. Section 1.4 Project Purpose identifies "improving the frequency, reliability, and travel time of passenger rail operations in Virginia and beyond, and providing a competitive alternative to highway and air travel" as a benefit listed in the Tier I EIS completed in 2002. The travel time goal expressed by the Virginia Department of Rail and Public Transportation (VADRPT) was to save fifteen (15) minutes for travelers between Richmond and Washington D.C. Upon notification from FRA in the spring of 2017 that this goal would not be met VADRPT commenced to change the criteria by reducing this goal to about five (5) minutes. Not only does this change reduce the benefit associated with the project as a whole, but from a process standpoint it is a dramatic change which has 1. Largely gone undiscussed by VADRPT staff, and 2. Would likely change the perception of many who have previously commented on the Tier I and Tier II DEIS. In this instance, the Town believes further public outreach and education should be conducted, in addition to further opportunities to publicly comment, to ensure citizens and stakeholders have the most current information, and are not commenting to support a benefit which VADRPT is no longer attempting to accomplish. 144

3. Section 1.6.2.1 - The stated purpose of the SEHSR program, as stated in the Tier I EIS, is to provide a competitive transportation choice to travelers within the Washington, D.C. to Charlotte travel corridor. Implementation of improved passenger rail service in the Washington, D.C. to Charlotte SEHSR corridor could: 145
   - Provide a more balanced and energy-efficient use of the corridor's transportation infrastructure

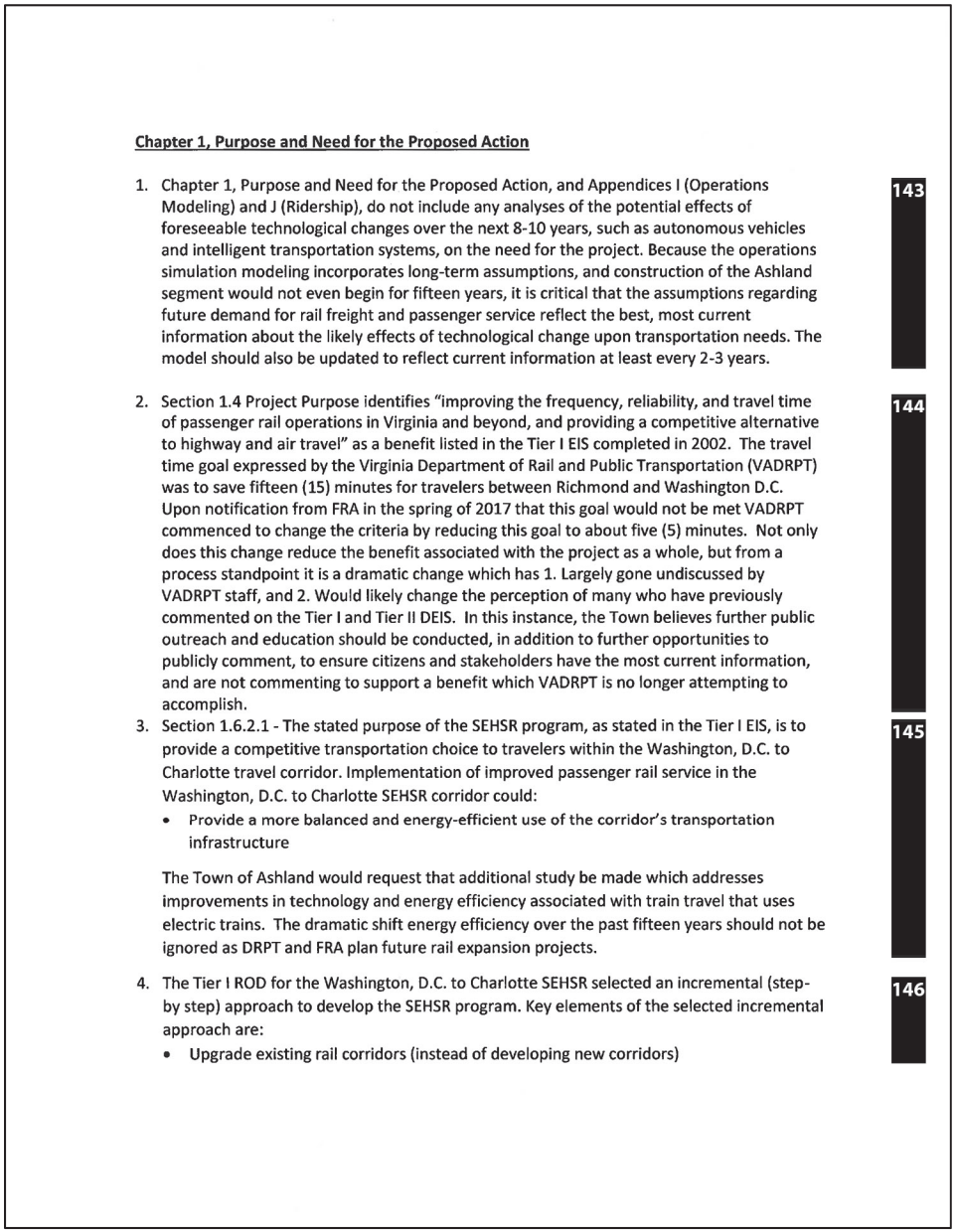
   The Town of Ashland would request that additional study be made which addresses improvements in technology and energy efficiency associated with train travel that uses electric trains. The dramatic shift energy efficiency over the past fifteen years should not be ignored as DRPT and FRA plan future rail expansion projects.

4. The Tier I ROD for the Washington, D.C. to Charlotte SEHSR selected an incremental (step-by step) approach to develop the SEHSR program. Key elements of the selected incremental approach are: 146
   - Upgrade existing rail corridors (instead of developing new corridors)

VIRGINIA DEQ (continued)

143. In 2002, the FRA completed the Tier I EIS for the Southeast High Speed Rail corridor that established the overall purpose and defined the route for providing a competitive transportation choice for travelers within the Washington, D.C. to Richmond, Raleigh, and Charlotte travel corridor. The DC2RVA Tier II EIS carries forward the purpose of the 2002 Tier I EIS within the Washington, D.C. to Richmond portion of the larger SEHSR corridor by identifying the infrastructure improvements necessary to provide a competitive transportation choice for current and future conditions; refer to Section 1.2 of the Final EIS for additional clarification since the Draft EIS FRA projected passenger, commuter, and freight train levels for 20 years (2045) to ensure the proposed infrastructure improvements will be sufficient to meet the Project's Purpose and Need. The DC2RVA Project does not preclude adoption of, or adjustment for, future technological changes. Developing the corridor incrementally based on market demand and/or funding availability allows flexibility to accommodate future technological changes in final design.

(Responses are continued on next page)



Chapter 1, Purpose and Need for the Proposed Action

1. Chapter 1, Purpose and Need for the Proposed Action, and Appendices I (Operations Modeling) and J (Ridership), do not include any analyses of the potential effects of foreseeable technological changes over the next 8-10 years, such as autonomous vehicles and intelligent transportation systems, on the need for the project. Because the operations simulation modeling incorporates long-term assumptions, and construction of the Ashland segment would not even begin for fifteen years, it is critical that the assumptions regarding future demand for rail freight and passenger service reflect the best, most current information about the likely effects of technological change upon transportation needs. The model should also be updated to reflect current information at least every 2-3 years.

143

2. Section 1.4 Project Purpose identifies "improving the frequency, reliability, and travel time of passenger rail operations in Virginia and beyond, and providing a competitive alternative to highway and air travel" as a benefit listed in the Tier I EIS completed in 2002. The travel time goal expressed by the Virginia Department of Rail and Public Transportation (VADRPT) was to save fifteen (15) minutes for travelers between Richmond and Washington D.C. Upon notification from FRA in the spring of 2017 that this goal would not be met VADRPT commenced to change the criteria by reducing this goal to about five (5) minutes. Not only does this change reduce the benefit associated with the project as a whole, but from a process standpoint it is a dramatic change which has 1. Largely gone undiscussed by VADRPT staff, and 2. Would likely change the perception of many who have previously commented on the Tier I and Tier II DEIS. In this instance, the Town believes further public outreach and education should be conducted, in addition to further opportunities to publicly comment, to ensure citizens and stakeholders have the most current information, and are not commenting to support a benefit which VADRPT is no longer attempting to accomplish.

144

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   - Provide a more balanced and energy-efficient use of the corridor's transportation infrastructure

   The Town of Ashland would request that additional study be made which addresses improvements in technology and energy efficiency associated with train travel that uses electric trains. The dramatic shift energy efficiency over the past fifteen years should not be ignored as DRPT and FRA plan future rail expansion projects.

145

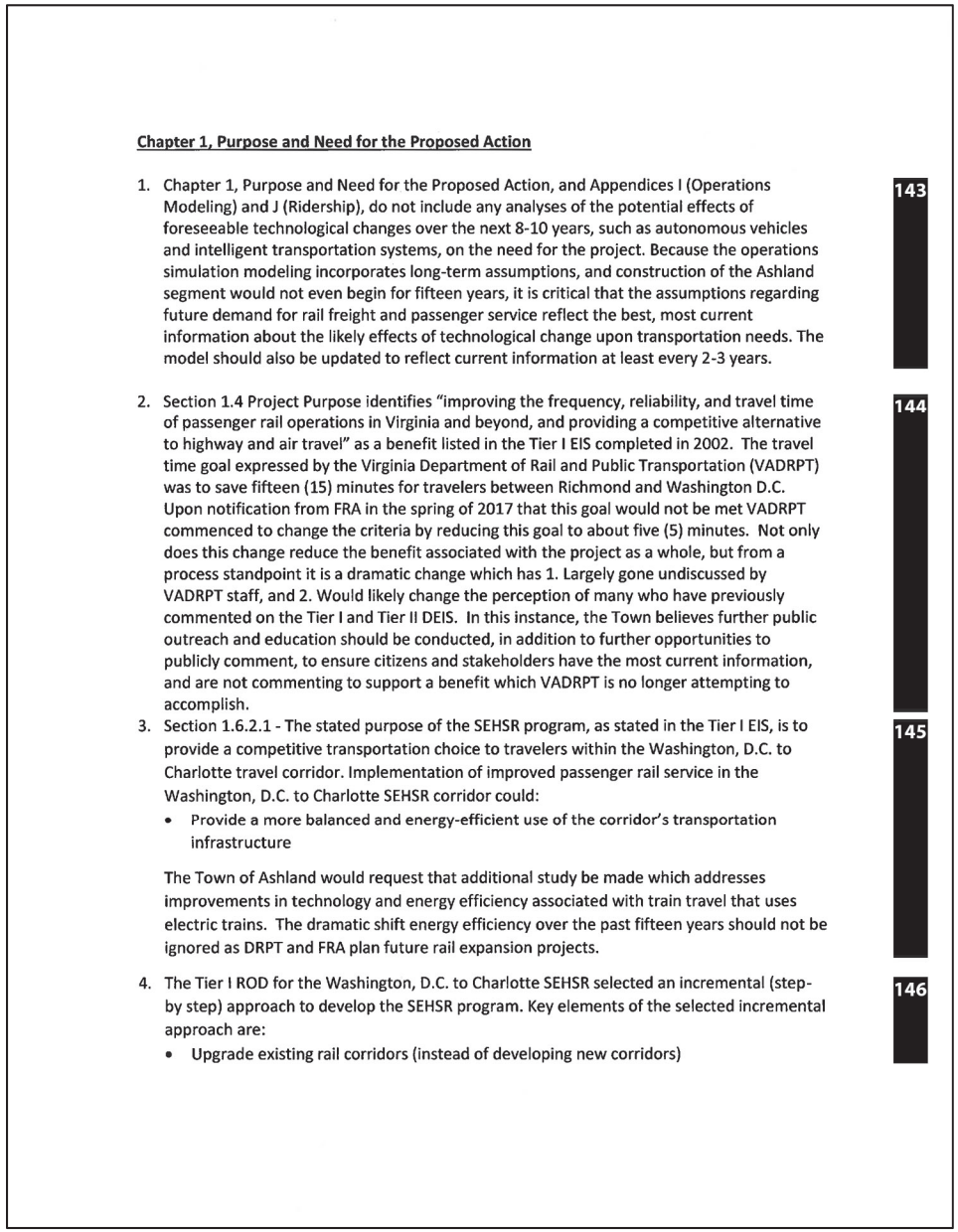
4. The Tier I ROD for the Washington, D.C. to Charlotte SEHSR selected an incremental (step-by step) approach to develop the SEHSR program. Key elements of the selected incremental approach are:
   - Upgrade existing rail corridors (instead of developing new corridors)

146

VIRGINIA DEQ (continued)

144. The 2002 Tier I EIS established the overall purpose for the SEHSR program, which, as stated in the Tier I EIS, is to provide a competitive transportation choice to travelers within the Washington, D.C. to Richmond, Raleigh, and Charlotte travel corridor. The Tier I EIS recognizes that travel time and service reliability are key factors affecting the traveling public's choice of transportation mode. Neither FRA nor DRPT have set a specific goal for reductions in travel time for the Project, nor has a reduction in travel time been applied as a criterion during alternatives screening or other evaluation. Reductions in travel time are anticipated to vary among different trains based on their respective schedules and station stops, as well as the Project's final design. While preparing the Draft EIS, DRPT conducted a survey of rail, bus, air, and automobile passengers traveling between Richmond, Virginia and points north (see Appendix J of the Draft EIS). The central purpose of the survey was to better understand the behavior of travelers along the DC2RVA corridor. Data collected from the survey were used to estimate an initial set of passenger sensitivities to changes in fare, travel time, and other service attributes. DRPT found that the traveling public (e.g., number of riders) was directly responsive to improved reliability and frequency of passenger rail service. Reduced travel time, while a benefit, had less effect on ridership.

(Responses are continued on next page)



Chapter 1, Purpose and Need for the Proposed Action

1. Chapter 1, Purpose and Need for the Proposed Action, and Appendices I (Operations Modeling) and J (Ridership), do not include any analyses of the potential effects of foreseeable technological changes over the next 8-10 years, such as autonomous vehicles and intelligent transportation systems, on the need for the project. Because the operations simulation modeling incorporates long-term assumptions, and construction of the Ashland segment would not even begin for fifteen years, it is critical that the assumptions regarding future demand for rail freight and passenger service reflect the best, most current information about the likely effects of technological change upon transportation needs. The model should also be updated to reflect current information at least every 2-3 years. 143

2. Section 1.4 Project Purpose identifies "improving the frequency, reliability, and travel time of passenger rail operations in Virginia and beyond, and providing a competitive alternative to highway and air travel" as a benefit listed in the Tier I EIS completed in 2002. The travel time goal expressed by the Virginia Department of Rail and Public Transportation (VADRPT) was to save fifteen (15) minutes for travelers between Richmond and Washington D.C. Upon notification from FRA in the spring of 2017 that this goal would not be met VADRPT commenced to change the criteria by reducing this goal to about five (5) minutes. Not only does this change reduce the benefit associated with the project as a whole, but from a process standpoint it is a dramatic change which has 1. Largely gone undiscussed by VADRPT staff, and 2. Would likely change the perception of many who have previously commented on the Tier I and Tier II DEIS. In this instance, the Town believes further public outreach and education should be conducted, in addition to further opportunities to publicly comment, to ensure citizens and stakeholders have the most current information, and are not commenting to support a benefit which VADRPT is no longer attempting to accomplish. 144

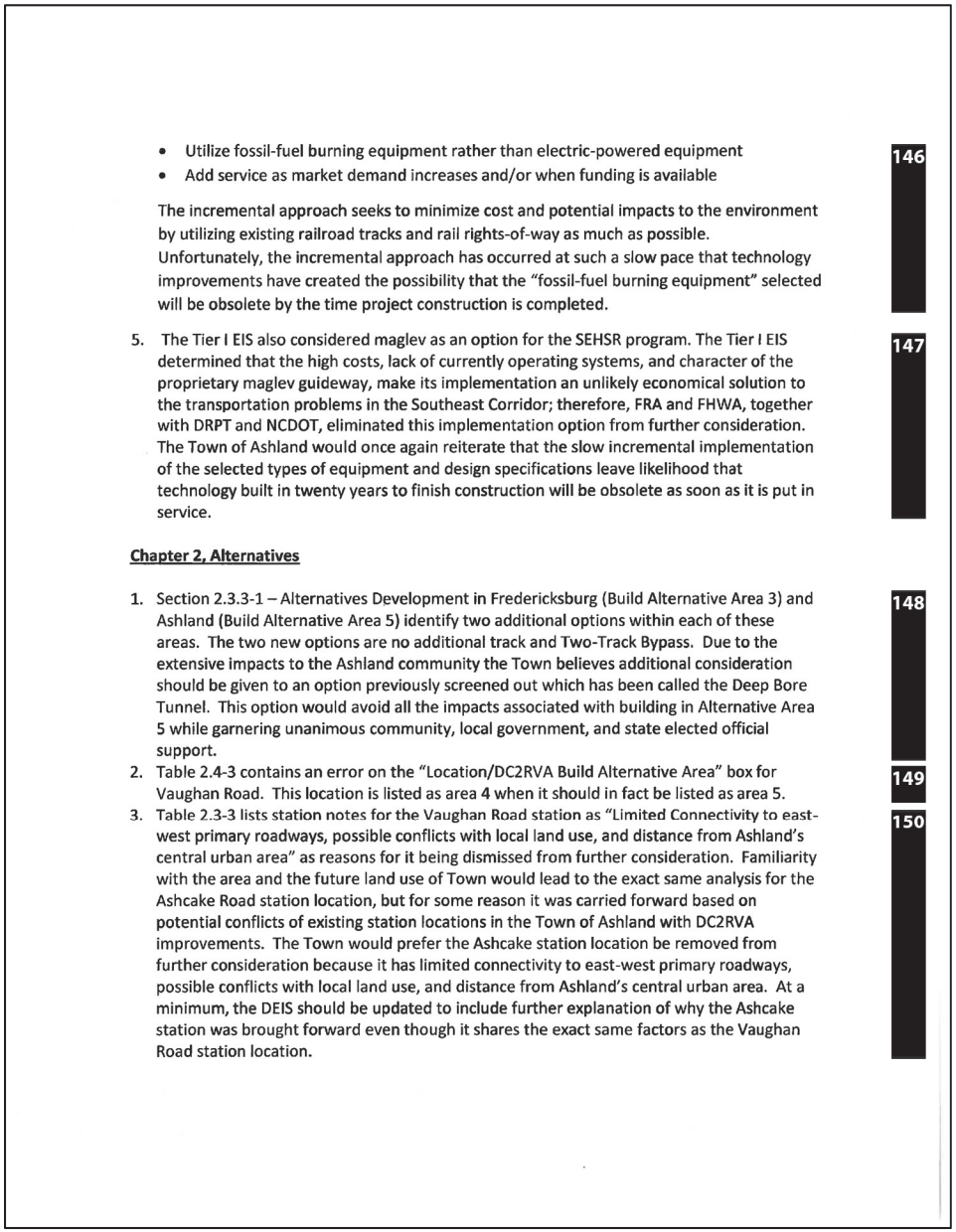
3. Section 1.6.2.1 - The stated purpose of the SEHSR program, as stated in the Tier I EIS, is to provide a competitive transportation choice to travelers within the Washington, D.C. to Charlotte travel corridor. Implementation of improved passenger rail service in the Washington, D.C. to Charlotte SEHSR corridor could: 145
   - Provide a more balanced and energy-efficient use of the corridor's transportation infrastructure

   The Town of Ashland would request that additional study be made which addresses improvements in technology and energy efficiency associated with train travel that uses electric trains. The dramatic shift energy efficiency over the past fifteen years should not be ignored as DRPT and FRA plan future rail expansion projects.

4. The Tier I ROD for the Washington, D.C. to Charlotte SEHSR selected an incremental (step-by step) approach to develop the SEHSR program. Key elements of the selected incremental approach are: 146
   - Upgrade existing rail corridors (instead of developing new corridors)

VIRGINIA DEQ (continued)

145. and 146. The DC2RVA Tier II EIS continues the incremental approach approved in the SEHSR Tier I ROD in the Washington, D.C. to Richmond, VA corridor along the existing rail corridor owned and operated by CSXT. Consistent with FRA's decision in the SEHSR Tier I ROD, DRPT identified and evaluated alternatives to improve and add capacity to the existing rail corridor which utilize fossil-fuel burning equipment. Alternative technologies (such as Maglev or hyperloop technologies or use of electric locomotives) are not consistent with the Purpose and Need defined in the 2002 Tier I EIS and ROD, so do not meet the Purpose and Need of the DC2RVA Project. DRPT does recognize that technologies are changing, and new transportation modes and options may be available in the future. The Project's Basis of Design allows for sufficient clearance on new grade-separated roadway crossings so as not to preclude a potential future electric catenary system. Advancing the DC2RVA Project along the incremental approach selected by FRA does not preclude future applications of hyperloop or other new technologies if or when they become viable, which would be subject to separate environmental documentation at that time.



- Utilize fossil-fuel burning equipment rather than electric-powered equipment
- Add service as market demand increases and/or when funding is available

The incremental approach seeks to minimize cost and potential impacts to the environment by utilizing existing railroad tracks and rail rights-of-way as much as possible. Unfortunately, the incremental approach has occurred at such a slow pace that technology improvements have created the possibility that the "fossil-fuel burning equipment" selected will be obsolete by the time project construction is completed.

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5. The Tier I EIS also considered maglev as an option for the SEHSR program. The Tier I EIS determined that the high costs, lack of currently operating systems, and character of the proprietary maglev guideway, make its implementation an unlikely economical solution to the transportation problems in the Southeast Corridor; therefore, FRA and FHWA, together with DRPT and NCDOT, eliminated this implementation option from further consideration. The Town of Ashland would once again reiterate that the slow incremental implementation of the selected types of equipment and design specifications leave likelihood that technology built in twenty years to finish construction will be obsolete as soon as it is put in service.

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Chapter 2, Alternatives

1. Section 2.3.3-1 – Alternatives Development in Fredericksburg (Build Alternative Area 3) and Ashland (Build Alternative Area 5) identify two additional options within each of these areas. The two new options are no additional track and Two-Track Bypass. Due to the extensive impacts to the Ashland community the Town believes additional consideration should be given to an option previously screened out which has been called the Deep Bore Tunnel. This option would avoid all the impacts associated with building in Alternative Area 5 while garnering unanimous community, local government, and state elected official support.

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2. Table 2.4-3 contains an error on the "Location/DC2RVA Build Alternative Area" box for Vaughan Road. This location is listed as area 4 when it should in fact be listed as area 5.

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3. Table 2.3-3 lists station notes for the Vaughan Road station as "Limited Connectivity to east-west primary roadways, possible conflicts with local land use, and distance from Ashland's central urban area" as reasons for it being dismissed from further consideration. Familiarity with the area and the future land use of Town would lead to the exact same analysis for the Ashcake Road station location, but for some reason it was carried forward based on potential conflicts of existing station locations in the Town of Ashland with DC2RVA improvements. The Town would prefer the Ashcake station location be removed from further consideration because it has limited connectivity to east-west primary roadways, possible conflicts with local land use, and distance from Ashland's central urban area. At a minimum, the DEIS should be updated to include further explanation of why the Ashcake station was brought forward even though it shares the exact same factors as the Vaughan Road station location.

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VIRGINIA DEQ (continued)

(Response to comment 146 on previous page)

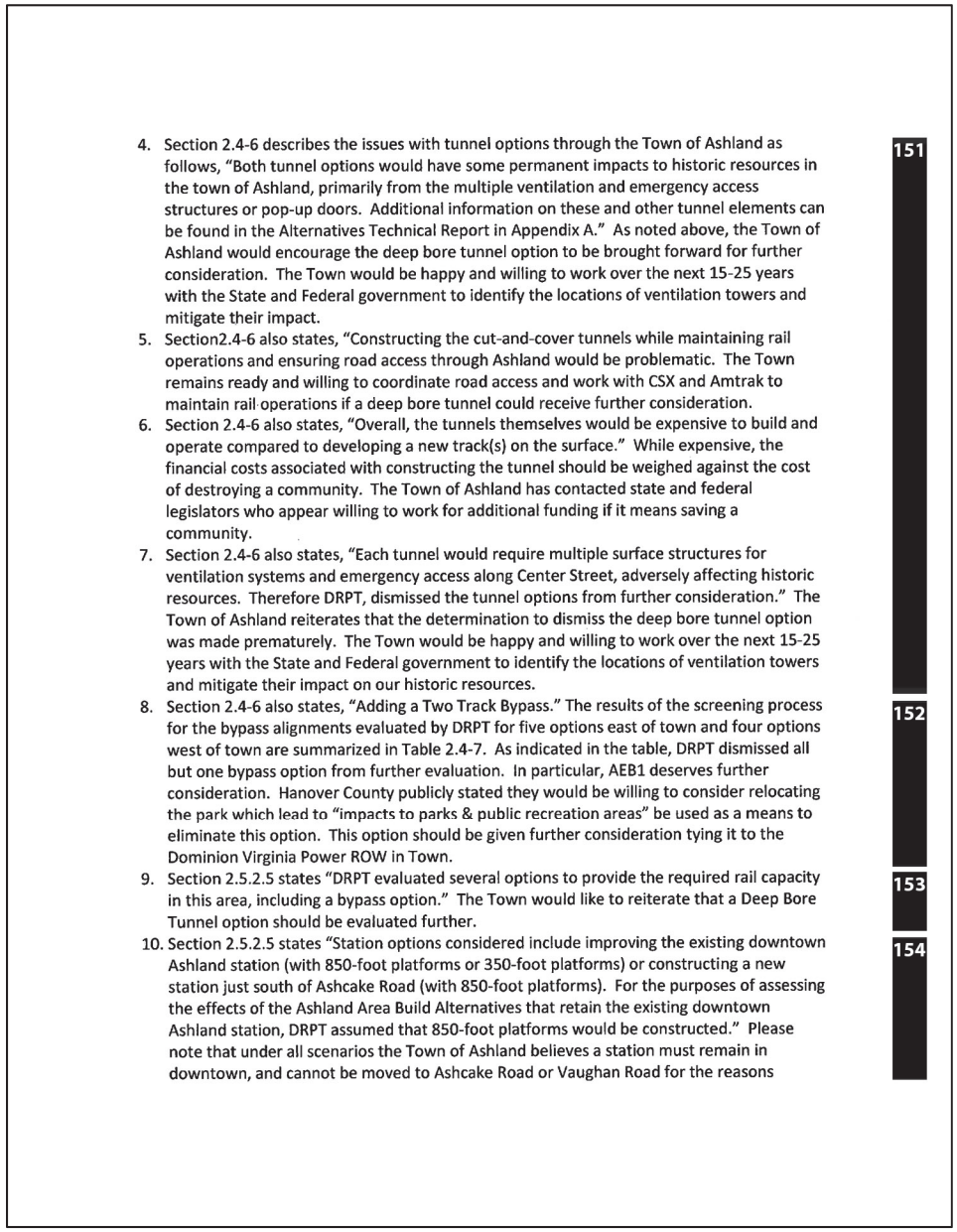
147. Refer to DRPT-numbered statement #143 for response.

148. Refer to DRPT-numbered statement #151 for more Town comments on a deep bore tunnel and DRPT response.

149. The requested correction has been addressed in the errata table for the Draft EIS, which is Appendix A of the Final EIS.

150. DRPT and FRA initially focused review of Ashland Station alternatives on the existing downtown station, which is centrally located to serve Ashland and the Randolph-Macon College campus, and provides easy access to Route 54, the primary east-west road connecting Ashland to Route 1 and I-95 to the east and Hanover County's residential areas to the west. Based on comments from area stakeholders, DRPT conducted a screening evaluation of three alternate station locations: south of Ashcake Road; North of Vaughan Road; and adjacent to Patrick Street. The location adjacent to Patrick Street is reasonably close to downtown Ashland and Randolph-Macon's campus, but would have similar property and traffic impacts to expanding the downtown station and require acquisition of parkland. For these reasons, the Patrick Street location was eliminated from further consideration. Neither the station location north of Vaughan Road nor the location south of Ashcake Road are centrally located to serve downtown Ashland or the campus. The location north of Vaughan Road, while having reasonable road access to the east towards the Route 1 and I-95 corridors, has limited access to the west on narrow roads through a largely residential area before linking to Route 54. In contrast, the location south of Ashcake will have reasonable access to both the east and west via Ashcake Road, the area's other primary east-west corridor. Therefore, a potential station location south of Ashcake Road was carried forward for further consideration as an alternative to developing the downtown station to serve three tracks with 850 feet platforms.

DRPT notes that there are no improvements to the existing or alternate station location as part of the Preferred Alternative (see Section 4.3.5 of the Final EIS). Refer to DRPT-numbered statement #154.



4. Section 2.4-6 describes the issues with tunnel options through the Town of Ashland as follows, "Both tunnel options would have some permanent impacts to historic resources in the town of Ashland, primarily from the multiple ventilation and emergency access structures or pop-up doors. Additional information on these and other tunnel elements can be found in the Alternatives Technical Report in Appendix A." As noted above, the Town of Ashland would encourage the deep bore tunnel option to be brought forward for further consideration. The Town would be happy and willing to work over the next 15-25 years with the State and Federal government to identify the locations of ventilation towers and mitigate their impact.
5. Section2.4-6 also states, "Constructing the cut-and-cover tunnels while maintaining rail operations and ensuring road access through Ashland would be problematic. The Town remains ready and willing to coordinate road access and work with CSX and Amtrak to maintain rail operations if a deep bore tunnel could receive further consideration.
6. Section 2.4-6 also states, "Overall, the tunnels themselves would be expensive to build and operate compared to developing a new track(s) on the surface." While expensive, the financial costs associated with constructing the tunnel should be weighed against the cost of destroying a community. The Town of Ashland has contacted state and federal legislators who appear willing to work for additional funding if it means saving a community.
7. Section 2.4-6 also states, "Each tunnel would require multiple surface structures for ventilation systems and emergency access along Center Street, adversely affecting historic resources. Therefore DRPT, dismissed the tunnel options from further consideration." The Town of Ashland reiterates that the determination to dismiss the deep bore tunnel option was made prematurely. The Town would be happy and willing to work over the next 15-25 years with the State and Federal government to identify the locations of ventilation towers and mitigate their impact on our historic resources.
8. Section 2.4-6 also states, "Adding a Two Track Bypass." The results of the screening process for the bypass alignments evaluated by DRPT for five options east of town and four options west of town are summarized in Table 2.4-7. As indicated in the table, DRPT dismissed all but one bypass option from further evaluation. In particular, AEB1 deserves further consideration. Hanover County publicly stated they would be willing to consider relocating the park which lead to "impacts to parks & public recreation areas" be used as a means to eliminate this option. This option should be given further consideration tying it to the Dominion Virginia Power ROW in Town.
9. Section 2.5.2.5 states "DRPT evaluated several options to provide the required rail capacity in this area, including a bypass option." The Town would like to reiterate that a Deep Bore Tunnel option should be evaluated further.
10. Section 2.5.2.5 states "Station options considered include improving the existing downtown Ashland station (with 850-foot platforms or 350-foot platforms) or constructing a new station just south of Ashcake Road (with 850-foot platforms). For the purposes of assessing the effects of the Ashland Area Build Alternatives that retain the existing downtown Ashland station, DRPT assumed that 850-foot platforms would be constructed." Please note that under all scenarios the Town of Ashland believes a station must remain in downtown, and cannot be moved to Ashcake Road or Vaughan Road for the reasons

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154

VIRGINIA DEQ (continued)

151. DRPT and FRA considered a deep bore tunnel during the alternatives development and evaluation process, and dismissed the concept from further consideration during screening of potential alternatives (as reported in Alternatives Technical Report, Appendix A of the Draft EIS) due to high costs and potential impacts within the Town of Ashland. The concept of a deep bore tunnel – both a deep hard-rock version and a shallower soft-earth version – was further evaluated and considered by the Town of Ashland/Hanover County Community Advisory Committee (CAC) process (refer to Section 3.3 of the Final EIS for CAC details). The CAC members dismissed the deep bore tunnel as an unlikely alternative due to its anticipated cost, impacts to the Town from ventilation towers and other structures, and potential operational concerns.

152. The FRA and DRPT have identified Alternative 5A, which will maintain two tracks through Ashland, as the Preferred Alternative (refer to Section 4.3.5 of the Final EIS for details on the selection process). DRPT and FRA considered several eastern bypass alignments during the alternatives development and evaluation process, and dismissed the concept from further consideration during screening of potential alternatives (as reported in Alternatives Technical Report, Appendix A of the Draft EIS) due to high costs and potential impacts to parks, property, infrastructure (including Route 1 and I-95), and wetlands. Concept AEB1, in particular would have required additional right-of-way through an existing park. The concept of an eastern bypass, including AEB 1 through the park was further evaluated and considered by the CAC process (refer to Section 3.3 of the Final EIS for CAC details). The CAC dismissed the eastern bypass alternatives due to their high costs and impacts to property, infrastructure, and the park, and identified a western bypass alternative, known as AWB 1, as their "least objectionable" bypass alternative.

153. Refer to DRPT-numbered statement #151 for response.

(Responses are continued on next page)

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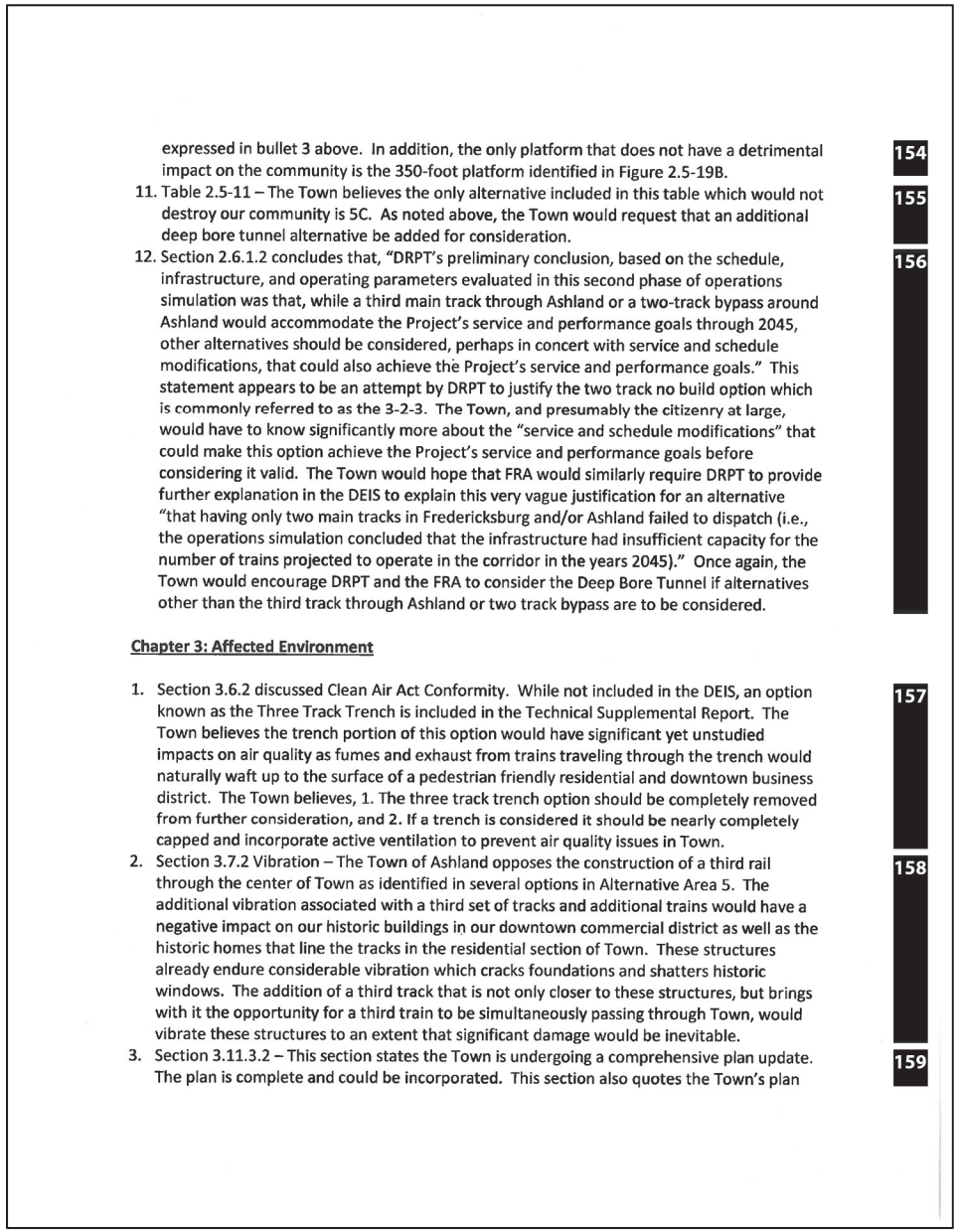
VIRGINIA DEQ (continued)

154. The Town of Ashland has stated a preference for maintaining the existing station location and improving the station with 350 feet platforms. The FRA and DRPT have identified Alternative 5A, which will maintain two tracks through Ashland, as the Preferred Alternative (refer to Section 4.3.5 of the Final EIS for details on the selection process). No roadway or station improvements will occur as part of the DC2RVA Project between Vaughan Road and Ashcake Road as part of Alternative 5A. Station platform improvements, unrelated to the DC2RVA Project, are being separately negotiated between the Town of Ashland and Amtrak. In this separate ongoing project, Amtrak is working with the Town of Ashland and FRA to improve the existing station platforms to meet ADA requirements. These improvements are independent of the DC2RVA Project and are likely to be in place before construction would start on the DC2RVA Project.



expressed in bullet 3 above. In addition, the only platform that does not have a detrimental impact on the community is the 350-foot platform identified in Figure 2.5-19B. 154

11. Table 2.5-11 – The Town believes the only alternative included in this table which would not destroy our community is 5C. As noted above, the Town would request that an additional deep bore tunnel alternative be added for consideration. 155
12. Section 2.6.1.2 concludes that, "DRPT's preliminary conclusion, based on the schedule, infrastructure, and operating parameters evaluated in this second phase of operations simulation was that, while a third main track through Ashland or a two-track bypass around Ashland would accommodate the Project's service and performance goals through 2045, other alternatives should be considered, perhaps in concert with service and schedule modifications, that could also achieve the Project's service and performance goals." This statement appears to be an attempt by DRPT to justify the two track no build option which is commonly referred to as the 3-2-3. The Town, and presumably the citizenry at large, would have to know significantly more about the "service and schedule modifications" that could make this option achieve the Project's service and performance goals before considering it valid. The Town would hope that FRA would similarly require DRPT to provide further explanation in the DEIS to explain this very vague justification for an alternative "that having only two main tracks in Fredericksburg and/or Ashland failed to dispatch (i.e., the operations simulation concluded that the infrastructure had insufficient capacity for the number of trains projected to operate in the corridor in the years 2045)." Once again, the Town would encourage DRPT and the FRA to consider the Deep Bore Tunnel if alternatives other than the third track through Ashland or two track bypass are to be considered. 156

Chapter 3: Affected Environment

1. Section 3.6.2 discussed Clean Air Act Conformity. While not included in the DEIS, an option known as the Three Track Trench is included in the Technical Supplemental Report. The Town believes the trench portion of this option would have significant yet unstudied impacts on air quality as fumes and exhaust from trains traveling through the trench would naturally waft up to the surface of a pedestrian friendly residential and downtown business district. The Town believes, 1. The three track trench option should be completely removed from further consideration, and 2. If a trench is considered it should be nearly completely capped and incorporate active ventilation to prevent air quality issues in Town. 157
2. Section 3.7.2 Vibration – The Town of Ashland opposes the construction of a third rail through the center of Town as identified in several options in Alternative Area 5. The additional vibration associated with a third set of tracks and additional trains would have a negative impact on our historic buildings in our downtown commercial district as well as the historic homes that line the tracks in the residential section of Town. These structures already endure considerable vibration which cracks foundations and shatters historic windows. The addition of a third track that is not only closer to these structures, but brings with it the opportunity for a third train to be simultaneously passing through Town, would vibrate these structures to an extent that significant damage would be inevitable. 158
3. Section 3.11.3.2 – This section states the Town is undergoing a comprehensive plan update. The plan is complete and could be incorporated. This section also quotes the Town's plan 159

VIRGINIA DEQ (continued)

(Response to comment 154 on previous page)

155. Refer to DRPT-numbered statement #151 for response.

156. FRA and DRPT, and the Ashland/Hanover CAC, considered and eliminated a deep bore tunnel alternative for achieving additional rail capacity in Area 5 (see response to DRPT-numbered statement #151). The FRA and DRPT have concluded that Alternative 5A, in which a third track is added north and south of downtown Ashland and two tracks are maintained through Ashland, has sufficient capacity to meet the Project's Purpose and Need. The ability of this alternative, with its reduced footprint and lower impacts to the community, to meet Project performance goals has been established by FRA and DRPT refined operations analysis modeling, as reported in Section 3.2 of the Final EIS.

157. The FRA and DRPT have identified Alternative 5A, which will maintain two tracks through Ashland, as the Preferred Alternative (refer to Section 4.3.5 of the Final EIS for details on the selection process). Trench options were considered during the alternatives development process, but were not carried forward as candidate Build Alternatives in the Draft EIS. A trench option was also considered by the Ashland/Hanover CAC process. The CAC determined a three-track trench through the Town of Ashland would be the "least objectionable" option for adding capacity through town below-grade.

(Responses are continued on next page)

expressed in bullet 3 above. In addition, the only platform that does not have a detrimental impact on the community is the 350-foot platform identified in Figure 2.5-19B. 154

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Chapter 3: Affected Environment

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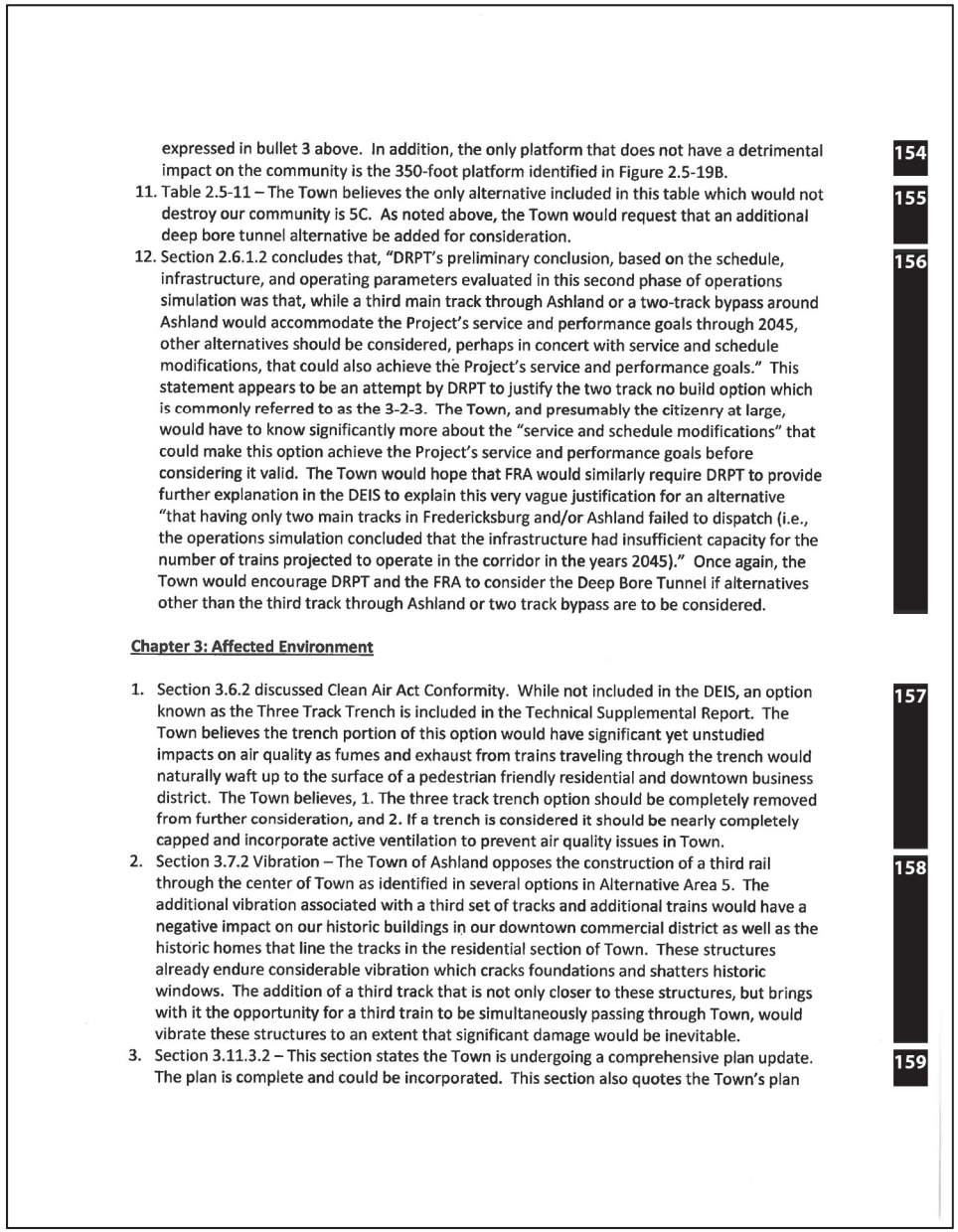
3. Section 3.11.3.2 – This section states the Town is undergoing a comprehensive plan update. The plan is complete and could be incorporated. This section also quotes the Town's plan 159

VIRGINIA DEQ (continued)

158. The FRA and DRPT have selected Build Alternative 5A: Maintain Two Tracks Through Town, which will maintain the existing two track railroad through Ashland, as the Preferred Alternative (refer to Section 4.3.5 of the Final EIS for details on the selection process). DRPT has followed FRA guidance for assessing potential ground-borne vibration associated with the proposed intercity passenger trains in the preparation of the Draft and Final EIS. The vibration assessment also followed precedent recently established by the Richmond to Raleigh (R2R) EIS, which was also approved by FRA. Per FRA, train-induced ground-borne vibration is assessed using a threshold for human perception of vibration. The threshold for human perception is much lower than the threshold for structural damage to fragile buildings, so this assessment approach is somewhat conservative with respect to potential building damage due to train-induced ground-borne vibration. Vibration is assessed on a per-event basis, not on a cumulative basis. Therefore, only the highest levels of vibration need to be studied, not the total amount of vibration occurring over a 24-hour period. On that basis, the vibration level from one of the proposed passenger trains is projected to be the same as the vibration level from all of the proposed passenger trains (9 new daily round-trip trains (18 total trains per day) for the Project). The most common source of ground-borne vibration in the study area is freight trains, which operate and may increase or decrease independently of the proposed DC2RVA Project. Freight trains generally produce higher levels (or more) ground-borne vibration than passenger trains because they are heavier. Preferred Alternative 5A will not involve any new tracks or the relocation of the existing tracks through Ashland and therefore vibration levels are expected to be similar to current levels as a result of the DC2RVA Project.

(Responses are continued on next page)



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Chapter 3: Affected Environment

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VIRGINIA DEQ (continued)

159. Comment noted. FRA and DRPT began preparing the Tier II Draft EIS for the DC2RVA Project in 2014, and the alternatives development process was underway in December 2016, when the 5-year review of the comprehensive plan was adopted by the Town Council. References to the Town's plan have been modified to address the Comprehensive Plan as of December 2016, and quoted language from the previous plan has been removed in the Final EIS; refer to the errata table for the Draft EIS, which is Appendix A.

stating, "The presence of the rail service 'contributes to the unique character of the Town, enhances local economy, and provides a service to the citizens of the Town and Hanover County.'" The plan also states that the Town "supports the Southeast High Speed Rail Corridor Initiatives" and "shall work with the federal, state and regional partners to ensure the success and development of this initiative." To be clear, the Town is supportive of the initiative, but would obviously not be supportive if the initiative were to implement an alternative in Town (5a, 5b, or 5d) that destroyed all the other things described in the Comprehensive Plan which make the Town so unique. The above quoted sections also support the fact that the Town would like to avoid, as noted in bullets above, any scenario which moves the Ashland Station from downtown. To conclude, VADRPT or FRA should not try to pick and choose language from the Town's Comprehensive Plan where we identify our relationship with the railroad as it exists today, and try to imply that description is an endorsement for additional rail capacity to be built through Town. 159

4. Table 3.11-5: Community Facilities and Services – This table identifies community facilities within 500 feet of the DC2RVA rail line. The Town of Ashland requests that the Ashland/Hanover Visitor Center, located in the Ashland Depot Train Station, be considered a community facility for the purposes of this table and for the purposes of all other sections of the DEIS study. 160
5. Section 3.13.2.1 – Buildings, Districts, Structures and Objects – The Town of Ashland would like the comments and suggestions provided by the members of the Ashland Museum to be incorporated into this section. In particular, the fencing required at the Ashland Station upon construction of a third rail through Town and any potential movement of the Ashland Station should be considered diminishing aspects of the resource and prevent a third rail from being considered. 161
6. Table 3.14-7 lists Section 4(f) Resources. North Ashland Park, Railside Park, and Carter Park should be listed as Town of Ashland and not Hanover County. 162

Chapter 4: Environmental Consequences

1. Section 4.9.1.5 describes the visual impacts of alternatives 5B and 5D through the Town of Ashland as medium. The Town of Ashland requests that these impacts be changed to "High" as the visual impact from a store, like Cross Brothers at 107 S. Railroad Avenue, would be dramatically impacted by having a rail a mere few feet from their front door. This analysis minimizes the visual impact in Town by assuming that having two tracks already running through Town makes adding a third a limited impact. That analysis is incorrect. These alternatives would have a high visual impact on downtown Ashland. 163
2. Section 4.9.2 states that "constructing tracks adjacent to the existing tracks would also minimize visual impacts and would occur for the Build Alternatives through most of the DC2RVA corridor". As noted above, this scenario would not limit visual impacts in Ashland, but would instead dramatically worsen them. 164
3. Section 4.11.1 – Economic Effects identifies only 1 business commercial relocation necessary in the Ashland area alternatives. This analysis is incorrect, specifically with reference to alternative 5B which adds an eastern track on Center Street in Ashland. The 165

VIRGINIA DEQ (continued)

(Response to comment 159 on previous page)

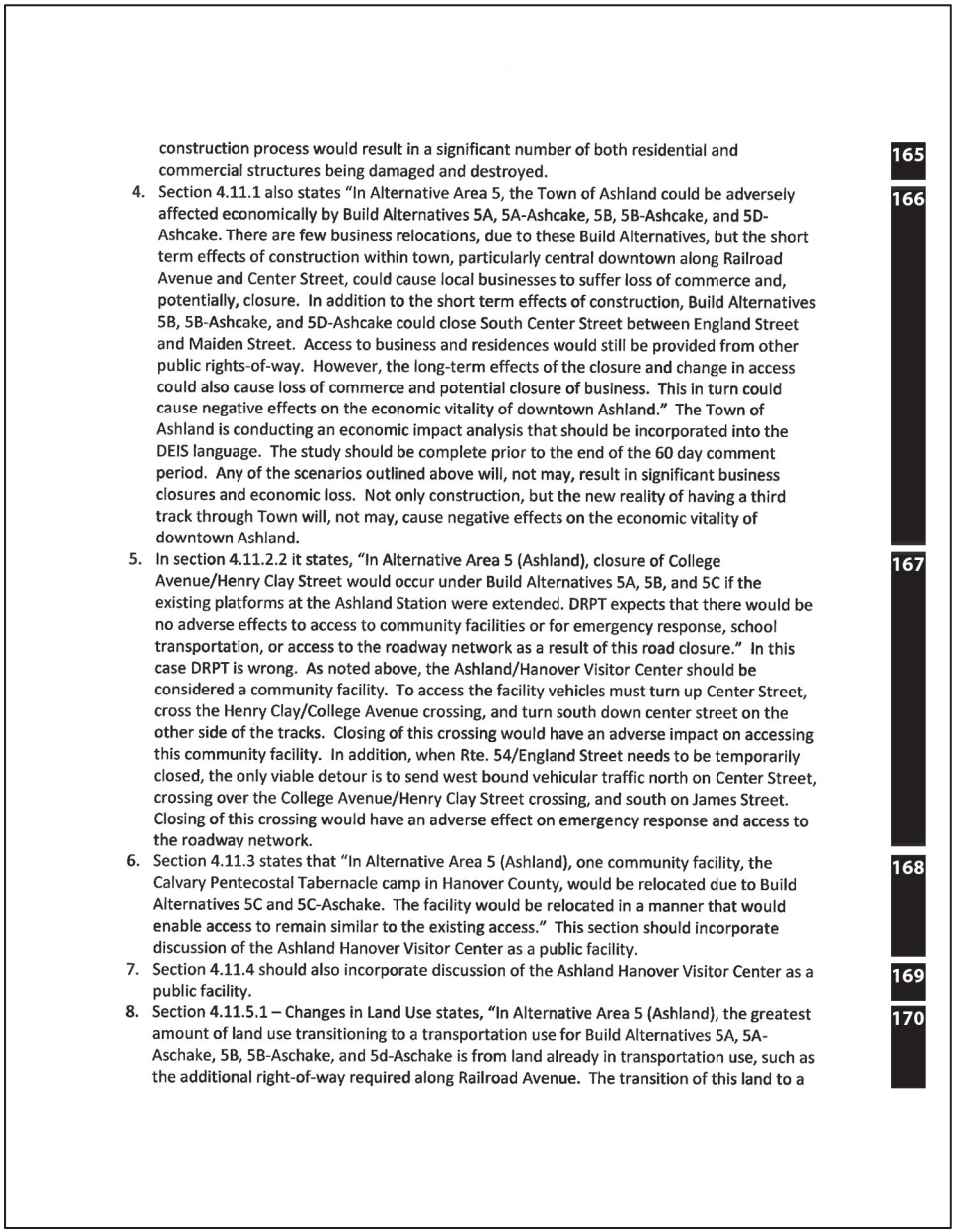
160. The designation of the Ashland/Hanover Visitor Center to a community facility has been corrected; refer to the errata table for the Draft EIS, which is Appendix A to the Final EIS. The FRA and DRPT have selected Alternative 5A: Maintain Two Tracks Through Town, which would will maintain the existing two track railroad through Ashland, as the Preferred Alternative (refer to Section 4.3.5 of the Final EIS for details on the selection process). The Preferred Alternative does not impact this community facility.

161. DRPT has responded to the Ashland Museum comments that the Town provided; refer to DRPT-numbered statements #197 through #235.

162. The requested corrections have been addressed in the errata table for the Draft EIS, which is Appendix A to the Final EIS.

163. and 164. FRA and DRPT have identified Alternative 5A, which will maintain two tracks through Ashland, as the Preferred Alternative (refer to Section 4.3.5 of the Final EIS for details). Section 4.9.1 of the Draft EIS describes the visual assessment methodology. While DRPT understands the Town of Ashland's concern with Build Alternatives 5B and 5D, the "High" visual impact rating does not apply as per the visual assessment methodology because the railroad tracks are already a predominant visual feature through town.

165. DRPT reviewed the business relocation analysis and concluded that the information as presented in Section 4.11.1 of the Draft EIS is correct. However, because Build Alternative 5A: Maintain Two Tracks Through Town was selected as the Preferred Alternative, there will be no permanent or temporary construction impacts to the businesses; refer to Final EIS Section 5.11 for details.



construction process would result in a significant number of both residential and commercial structures being damaged and destroyed. 165

4. Section 4.11.1 also states "In Alternative Area 5, the Town of Ashland could be adversely affected economically by Build Alternatives 5A, 5A-Ashcake, 5B, 5B-Ashcake, and 5D-Ashcake. There are few business relocations, due to these Build Alternatives, but the short term effects of construction within town, particularly central downtown along Railroad Avenue and Center Street, could cause local businesses to suffer loss of commerce and, potentially, closure. In addition to the short term effects of construction, Build Alternatives 5B, 5B-Ashcake, and 5D-Ashcake could close South Center Street between England Street and Maiden Street. Access to business and residences would still be provided from other public rights-of-way. However, the long-term effects of the closure and change in access could also cause loss of commerce and potential closure of business. This in turn could cause negative effects on the economic vitality of downtown Ashland." The Town of Ashland is conducting an economic impact analysis that should be incorporated into the DEIS language. The study should be complete prior to the end of the 60 day comment period. Any of the scenarios outlined above will, not may, result in significant business closures and economic loss. Not only construction, but the new reality of having a third track through Town will, not may, cause negative effects on the economic vitality of downtown Ashland. 166
5. In section 4.11.2.2 it states, "In Alternative Area 5 (Ashland), closure of College Avenue/Henry Clay Street would occur under Build Alternatives 5A, 5B, and 5C if the existing platforms at the Ashland Station were extended. DRPT expects that there would be no adverse effects to access to community facilities or for emergency response, school transportation, or access to the roadway network as a result of this road closure." In this case DRPT is wrong. As noted above, the Ashland/Hanover Visitor Center should be considered a community facility. To access the facility vehicles must turn up Center Street, cross the Henry Clay/College Avenue crossing, and turn south down center street on the other side of the tracks. Closing of this crossing would have an adverse impact on accessing this community facility. In addition, when Rte. 54/England Street needs to be temporarily closed, the only viable detour is to send west bound vehicular traffic north on Center Street, crossing over the College Avenue/Henry Clay Street crossing, and south on James Street. Closing of this crossing would have an adverse effect on emergency response and access to the roadway network. 167
6. Section 4.11.3 states that "In Alternative Area 5 (Ashland), one community facility, the Calvary Pentecostal Tabernacle camp in Hanover County, would be relocated due to Build Alternatives 5C and 5C-Aschake. The facility would be relocated in a manner that would enable access to remain similar to the existing access." This section should incorporate discussion of the Ashland Hanover Visitor Center as a public facility. 168
7. Section 4.11.4 should also incorporate discussion of the Ashland Hanover Visitor Center as a public facility. 169
8. Section 4.11.5.1 – Changes in Land Use states, "In Alternative Area 5 (Ashland), the greatest amount of land use transitioning to a transportation use for Build Alternatives 5A, 5A-Aschake, 5B, 5B-Aschake, and 5d-Aschake is from land already in transportation use, such as the additional right-of-way required along Railroad Avenue. The transition of this land to a 170

VIRGINIA DEQ (continued)

(Response to comment 165 on previous page)

166. DRPT acknowledges the economic impact analysis that was conducted by a third party at the request of the Town, which DEQ has provided as an attachment to this letter. Refer to DRPT-numbered statement #236 for response.

167. FRA and DRPT have identified Alternative 5A, which will maintain two tracks through Ashland, as the Preferred Alternative. As selected, it will not include any roadway or station modifications within downtown Ashland. Platform improvements at the Ashland Station are being negotiated between the Town of Ashland and Amtrak, with no proposed changes under the DC2RVA Project. Similarly, there will be no roadway improvements (including no modifications to existing at-grade crossing treatments) between Vaughan Road and Ashcake Road under the DC2RVA Project. Refer to Section 4.3.5 of the Final EIS for details of the Preferred Alternative in Area 5.

168. and 169. The Ashland/Hanover Visitor Center would be relocated under one option evaluated in the Draft EIS, Build Alternative 5D. However, Alternative 5A is the Preferred Alternative for Area 5, which will not affect the existing Ashland/Hanover Visitor Center.

170. and 171. DRPT acknowledges that the Town of Ashland finds the changes in land use from road to rail transportation to be an incompatible use.

transportation use would not be incompatible with the current use." This statement implies that turning a road into a railroad is an acceptable form of land use for the Town. That is incorrect. The transition from a one-way road with adjacent sidewalk to a railroad track with adjacent sidewalk in downtown Ashland is not a compatible use. Some roadways are built in such a way that transitioning to a railroad track may work, but in downtown Ashland the roadways are in a pedestrian and community setting which would not be compatible with additional railroad track. 170

9. Section 4.11.5.2 states "In Alternative Area 5 (Ashland), the Build Alternatives, other than the Ashland Bypass (build Alternative 5C and Alternative 5C-Ashcake), are compatible with future land use." The Town of Ashland would like further analysis, or at least some analysis of the statement. As stated in the prior bullets, adding an additional set of tracks through the Town is not compatible with our comprehensive plan, existing land use, or future land use plans of the Town. 171
10. Section 4.15.2.4 – DC2RVA Crossing Improvement Effects on the Total Daily Vehicle Delay refers to the Transportation Technical Report (Appendix S) for the details on the daily delay data. The referenced Appendix S Table 5-42 shows that the delay for England Street/Thompson Street is 23.67 hours in 2015 and 37.37 hours in 2025 (No Build). For Alternates 5A and 5B Build, the total delay at this crossing is 41.85 hours, which exceeds the 40-hour FHWA threshold. These dramatic increases under both Build and No Build conditions are due primarily to increased freight traffic, and will cause significant traffic backups for westbound vehicular traffic on England Street (which is State Route 54). The traffic backups will frequently be significant enough to interfere with traffic on US Route 1, which is 2750 feet east of the crossing. This is a significant safety concern and is not acceptable. 172
11. In the Summary of All Proposed Public Roadway Closures and Grade Separations it notes that "The Build Alternatives that include the addition of a track through town (Build Alternatives 5B, 5B-Aschake, and 5D-Aschake) require the closure of the eastern section of Center Street/Railroad Avenue between England/Thompson Street and Maiden Lane." The Town of Ashland finds this closure unacceptable due to the negative impacts to traffic safety, access associated with business, civic, and residential properties, and the negative economic impact of a reduction in parking and access to downtown properties. We would also incorporate this analysis to Table 4.15-11 which says this closing would have a "minimal effect". The impact of this closing would be fair greater than "minimal". 173

Chapter 5: Section 4(f) Evaluation

1. Section 5.5.1 Summary of Preliminary Section 4(f) Use Determinations states, "Two resources along Build Alternatives 5B, 5B-Aschake, and 5D-Ashcake have a potential Section 4(f) use. Build Alternatives 5A, 5A-Aschake, 5C, 5C-Ashcake would not result in a Section 4(f) use and, as such, would be the avoidance alternatives within this area." The Town of Ashland would like additional consideration given to contributing structures as identified by the Ashland Museum and Town of Ashland's Section 106 response. In addition, the Town would like to concur with support of alternative 5C as the best avoidance alternative within Alternative Area 5. 174

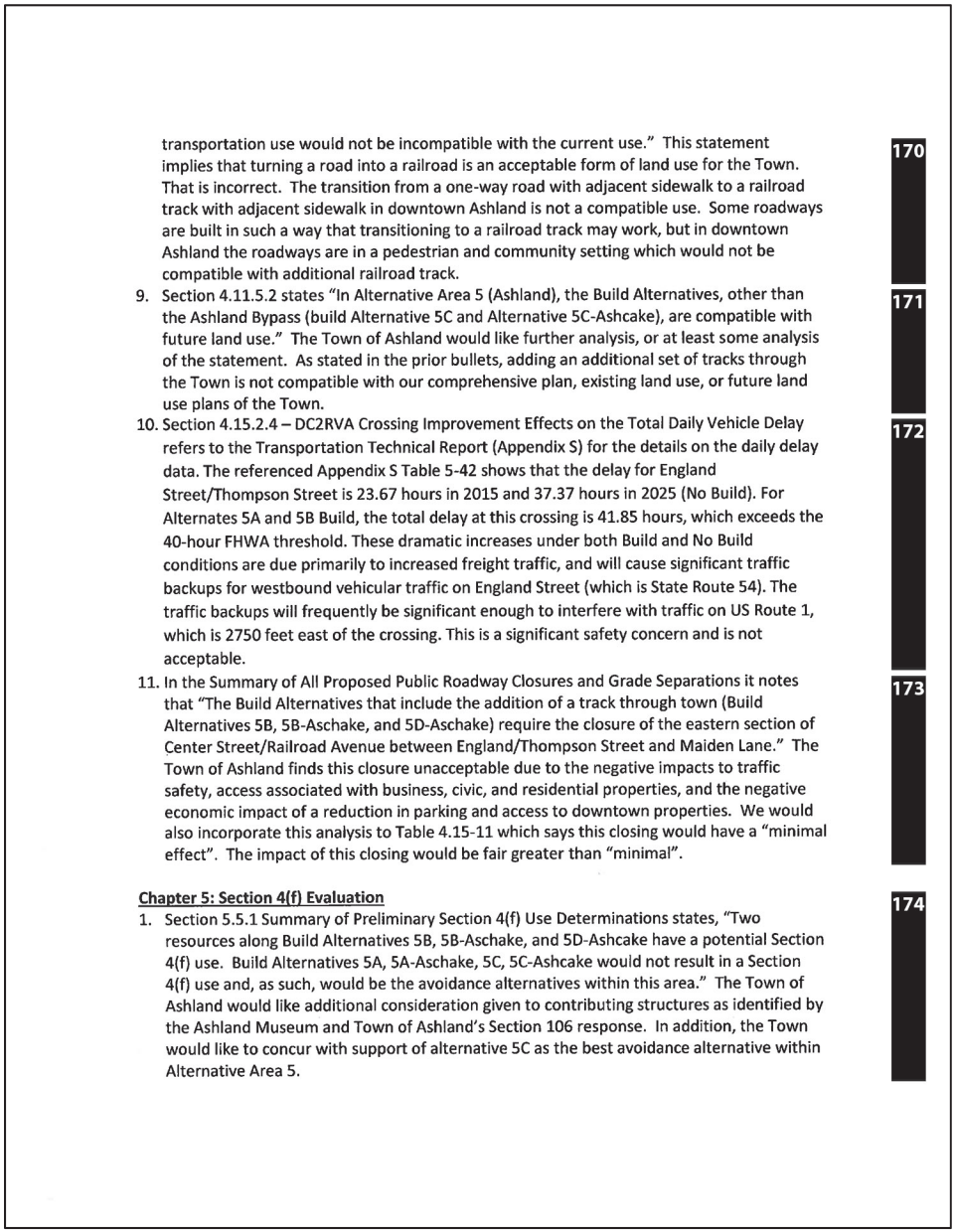
VIRGINIA DEQ (continued)

(Response to comments 170 and 171 on previous page)

172. The comment cites the calculated estimates of daily motor vehicle delay at the England Street/Thompson Street intersection for 2015 and 2025 No-Build, and for Alternatives 5A/5B Year 2025 Build conditions (from Tables 5-41 and 5-42 of Appendix S: Transportation Technical Report of the Draft EIS). As noted in the Draft EIS and reiterated in the comment, there are increases in delays between 2015 and 2025 for both No-Build and Build conditions; it is important to note that the delay impacts of the Project are represented by the difference between the 2025 No-Build and the Alternative 5A/5B Year 2025 Build conditions. Three-quarters of the increased delay occurs based on anticipated changes between 2015 and 2025 No-Build (i.e., unrelated to the DC2RVA Project), with the remaining 25 percent attributable to Alternative 5A/5B. Additionally, these tables summarize vehicle-hours of delay on a daily basis (i.e., an average across an entire day) and are not reflective of delay experienced by a single vehicle. The majority of delay in the corridor is the result of freight trains. CSXT growth is independent of the DC2RVA Project and will occur regardless of whether or not the DC2RVA Project is implemented. An updated analysis of Total Daily Vehicle Delay for the Preferred Alternative is presented in Final EIS Section 5.15.2.4.

    The comment cites the "40-hour FHWA threshold"; this "threshold" is identified as one of 11 conditions for which public at-grade crossings "should be considered for grade separation or otherwise eliminated" in FHWA's Railroad-Highway Grade Crossing Handbook. While one of 11 conditions identified by FHWA for consideration, this 40-hour value is not a hard requirement for implementing any particular improvement or action at a grade-crossing. Additional clarification on this topic has been added to Final EIS Section 5.15.2.4.

(Responses are continued on next page)



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11. In the Summary of All Proposed Public Roadway Closures and Grade Separations it notes that "The Build Alternatives that include the addition of a track through town (Build Alternatives 5B, 5B-Aschake, and 5D-Aschake) require the closure of the eastern section of Center Street/Railroad Avenue between England/Thompson Street and Maiden Lane." The Town of Ashland finds this closure unacceptable due to the negative impacts to traffic safety, access associated with business, civic, and residential properties, and the negative economic impact of a reduction in parking and access to downtown properties. We would also incorporate this analysis to Table 4.15-11 which says this closing would have a "minimal effect". The impact of this closing would be fair greater than "minimal".

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VIRGINIA DEQ (continued)

173. Refer to DRPT-numbered statement #167. Preferred Alternative 5A will not require any closure of Center Street / Railroad Avenue in the Town of Ashland. All modifications to address necessary changes to traffic flow and operations resulting from the Preferred Alternative will conform to all applicable current AASHTO and VDOT standards.

174. Additional details on this comment are included in the attachment from the Ashland Museum. Refer to DRPT-numbered statements #201-235 for a detailed response.

2. Section 5.5.7 states, "This Draft EIS does not identify a recommended Preferred Alternative for Alternative Area 5; therefore, FRA will defer determination of use of the resources in this area to the Final EIS." The Town of Ashland believes this determination does not provide for sufficient community and stakeholder understanding and input on alternatives. Additional opportunities for public input are necessary once a preferred alternative for Alternative Area 5 is recommended. The Town of Ashland would once again recommend alternative 5C as the preferred alternative to avoid section 4(f) uses of historic resources in Town. 175

Chapter 6: Public Involvement and Agency Coordination

1. Section 6.2.4 Ashland Community Advisory Committee states, "As part of this community-based effort, DRPT established a Community Advisory Committee (CAC) to take a more intensive look at at previous options, identify any potential new options to meet the Purpose and Need of the DC2RVA Project, and suggest mitigation strategies to address Project Impacts. The first meeting of the CAC was held in May 2017." While the Town is appreciative of the efforts to create the CAC; the timing of their meetings did not allow for the results of the meetings to be considered as part of the DEIS. The Town of Ashland does not believe the recommendations of the CAC can be fully incorporated into a Final EIS without considerable additional opportunities for public input, DRPT and FRA engineering and analysis, and efforts to mitigate impacts of proposals generated through the CAC process. In particular, the CAC recommended two least objectionable alternatives which have only received limited study in the DEIS (AWB1) as a western bypass, and absolutely zero analysis in the DEIS (the three track trench). The Town of Ashland believes any consideration of the three track trench should be discontinued due to the fact that it was created by DRPT at the last CAC meeting, and has not been engineered or evaluated sufficiently to warrant moving forward in the DEIS or FEIS. In addition, the Town of Ashland was told that the deep bore tunnel would be unlikely to be built due to its cost even though cost is not supposed to be considered as part of the NEPA process. This fact is what led the Deep Bore Tunnel to be replaced by the Three Tract Trench as the least objectionable alternative "underground" by the CAC. The Town would like to reiterate that the deep bore tunnel would have not only been listed as a least objectionable alternative by the CAC, but would have received unanimous support as the Preferred Alternative for Alternative Area 5 had it not been for DRPT staff introducing cost as consideration. 176
2. Table 6.3-1 lists the Ashland Museum as the only consulting party listed for the Town of Ashland. It should be noted that the Town of Ashland was not notified about participating as a consulting party until late in 2016; over a year after all other consulting parties had been invited and participated in analysis. 177

Chapter 7: DRPT Recommended Preferred Alternative

1. Section 7.5 states, "DRPT has not identified a Recommended Alternative for the Ashland area of the DC2RVA corridor in this Draft EIS. DRPT recognizes that each of the proposed Build Alternatives would have adverse consequences on the citizens and resources of the 178

VIRGINIA DEQ (continued)

175. The Draft EIS, prepared by FRA and DRPT in accordance with the National Environmental Policy Act (NEPA) and its implementing regulations, describes the alternatives development process and for Area 5 (Ashland) evaluates in detail seven alternatives, including Alternative 5A, Maintain two Tracks through Town. While there is no requirement within NEPA to identify a preferred alternative as part of Draft EIS documentation, the Draft EIS for the Project identified DRPT's recommended preferred alternative for the corridor, but did not recommend a specific preferred alternative for Area 5 (Ashland). Instead, DRPT established a CAC to further review and inform the evaluation of alternatives for Area 5, which is summarized in Section 3.3 of the Final EIS. The CAC met five times in open public meetings to review Project alternatives and identified, from a community perspective, the least objectionable through Town, western bypass, and below-ground alternatives. After reviewing all the comments received on the Draft EIS and considering the input from the CAC process, on December 6, 2017, DRPT provided the CTB with a final recommendation for a Preferred Alternative. The CTB formally identified Alternative 5A - Maintain Two Tracks Through Town as the Commonwealth of Virginia's Preferred Alternative for Area 5. FRA has agreed with and confirmed DRPT's recommendation that Alternative 5A meets the Purpose and Need of the DC2RVA Project.

176. DRPT has conducted the public outreach for the Project in accordance with FRA's requirements under NEPA and its implementing regulations. Beginning in 2014, DRPT held 4 public scoping meetings (including one in Ashland), 3 public meetings to present alternatives development and screening criteria, 3 public meetings to review preliminary alternatives screening results, and 1 public meeting in Hanover County to review the Project, proposed bypass routes, and access to private property. DRPT also held multiple meetings with representatives of the Town and County since the Project inception.

(Responses are continued on next page)

2. Section 5.5.7 states, "This Draft EIS does not identify a recommended Preferred Alternative for Alternative Area 5; therefore, FRA will defer determination of use of the resources in this area to the Final EIS." The Town of Ashland believes this determination does not provide for sufficient community and stakeholder understanding and input on alternatives. Additional opportunities for public input are necessary once a preferred alternative for Alternative Area 5 is recommended. The Town of Ashland would once again recommend alternative 5C as the preferred alternative to avoid section 4(f) uses of historic resources in Town. 175

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VIRGINIA DEQ (continued)

The Ashland/Hanover CAC held five public meetings during the period May – September 2017, plus multiple community-led meetings to publicly evaluate Project alternatives in the Ashland/Hanover area. The Draft EIS described the CAC process, and all CAC presentations, questions/answers, and technical briefing materials were made public via the DC2RVA Project website.

DRPT held 5 public hearings, including one in the Ashland/Hanover area, in conjunction with the public release of the Draft EIS in September of 2017. FRA's Preferred Alternative, 5A, was evaluated in detail in the Draft EIS, and was identified by the CAC as the "least objectionable" through-town alternative. The deep bore tunnel alternative was considered and eliminated by FRA and DRPT during the initial alternatives screening process, and was considered and eliminated again by the CAC during the CAC process. The three-track trench alternative was considered by the CAC and identified as the "least objectionable" below-ground option.

177. The Ashland Museum elected to be a consulting party in January 2015. The Town of Ashland was invited to be a consulting party, and elected to participate, in February 2017. All consulting party materials (letters, emails, reports, etc.) were disseminated to the Town upon becoming a consulting party. Since February 2017, DRPT held two in-person meetings and two conference calls with the Town and the Ashland Museum specifically focused on cultural resources. DRPT is committed to continuing this dialogue through completion of the Tier II process, final design, and implementation (once funding becomes available) and will disseminate data as available, including any ensuing reports, eligibility determinations, Project effect, and Section 106 Memorandum of Agreement (MOA) production (the Section 106 Draft MOA is Appendix K of the Final EIS). Information and updates will be sent through several media outlets to ensure communication is open and informative.

(Responses are continued on next page)

2. Section 5.5.7 states, "This Draft EIS does not identify a recommended Preferred Alternative for Alternative Area 5; therefore, FRA will defer determination of use of the resources in this area to the Final EIS." The Town of Ashland believes this determination does not provide for sufficient community and stakeholder understanding and input on alternatives. Additional opportunities for public input are necessary once a preferred alternative for Alternative Area 5 is recommended. The Town of Ashland would once again recommend alternative 5C as the preferred alternative to avoid section 4(f) uses of historic resources in Town. 175

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VIRGINIA DEQ (continued)

178. As described in Section 2.1.4.3 of the Final EIS, the Ashland/Hanover CAC, composed of representatives of Hanover County, Town of Ashland, Randolph-Macon College, and CSXT, was asked to review all Project alternatives for the area and develop a local consensus that met the DC2RVA Purpose and Need. After holding 5 meetings reviewing alternatives for the Ashland/Hanover area, including the deep bore tunnel, the CAC was unable to reach consensus for a single alternative and instead identified a "least objectionable" alternative for a western bypass, a through town option (Alternative 5A, DRPT's Preferred Alternative), and a three-track trench (below grade option). During a CTB meeting in October 2017 to present the results of the CAC process, Town representatives spoke in favor of a western bypass and County representatives spoke in favor of a trench or other through Town option. The rationale for selecting 5A: Maintain Two Tracks Through Town is presented in Section 4.3.5 of the Final EIS.

Town of Ashland or Hanover County, and there is no local consensus or preference for a Build Alternative." As noted many times in prior comments, this notion that there is not local consensus is incorrect. The Town of Ashland and Hanover County, along with State and Federal legislatures would all unanimously support a Deep Bore Tunnel. 178

Appendix A: Alternatives Technical Report

1. Section 1.9 Alternatives Carried Forward identifies four alternatives carried forward for consideration. The Town of Ashland, as noted above, believes the Deep Bore Tunnel was eliminated from screening too early and should be brought forth for further study in the Alternatives Technical Report and DEIS itself. Of those options brought forward, the only one that is in the DEIS, recommended by the CAC, and recommended by the Town of Ashland is the Western Bypass alternative. 179
2. Section 3.2.4.5 states "The Amtrak station includes two side platforms facing Tracks 2 and 3. These platforms are insufficient to serve the full length of the trains stopping in Ashland. Both platforms fail to meet accessibility requirements due to heights that are below the top of rail, narrow in width, and have a rough brick surface." It should be noted in the DEIS and FEIS that the Town is working on a platform improvement project with Amtrak, CSX, and FRA that will begin construction in 2018 and fix/alleviate all the failings noted in the quoted description above. 180
3. Section 5.2.1 Previous Studies and Design references a document called *Decision Brief: Alternative Considered But Dismissed, Richmond to Doswell, VA* from 2009. It states, "The segment's use for intercity passenger rail service was inconsistent with local plans and was opposed by Henrico County, Hanover County, and the Town of Ashland." The Town of Ashland would like to make clear that it did, in fact, oppose use of BBRR for passenger service, but would like to not that the information provided by DRPT to reach that conclusion was insufficient in 2009. DRPT presented the case for use of BBRR in terms of keeping or foregoing passenger rail. The Town of Ashland obviously chose to support keeping passenger rail within the Town. Unfortunately, DRPT did not share with local governments that opposing use of BBRR for passenger rail service would inherently lead to the need for additional rail capacity through the existing ROW in the corridor. In this instance, the Town of Ashland may very well have been supportive of losing passenger rail to the BBRR if it meant additional rail capacity in the form of a third set of tracks through the Town was unnecessary. 181
4. Section 6.7.2 Ashland Area Alignment Screening states, "Overall, the tunnels themselves would be expensive to build and operate compared to developing a new track(s) on the surface. Each tunnel would require multiple surface structures and/or gates for ventilation systems and emergency access along Center Street, adversely affecting historic resources. Due to the impacts summarized above, DRPT dismissed the tunnel options form further consideration." As noted above, the Town of Ashland disagrees with dismissing the Deep Bore Tunnel and recommends it be brought forward in the DEIS and FEIS for further study. The Town will work with the State and Federal government to not only limit impacts to historic resources, but actively partner with Hanover County to mitigate wetland impacts associated with the Deep Bore Tunnel openings. As noted above, the Town and County will 182

VIRGINIA DEQ (continued)

(Response to comment 178 on previous page)

179. Subsequent to the Draft EIS alternatives development process, the concept of a deep bore tunnel – both a deep hard-rock version and a shallower soft-earth version – was further evaluated and considered by the Ashland/Hanover CAC process. The CAC members dismissed the deep bore tunnel as an unlikely Project alternative due to its anticipated cost, impacts to the Town from ventilation towers and other structures, and potential operation concerns; refer to Appendix G of the Final EIS for details.

180. Refer to DRPT-numbered statement #167 for response.

181. As noted by the Town of Ashland, the 2009 Decision Brief: Alternatives Considered but Dismissed, Richmond to Doswell, VA, was developed by DRPT and approved by FRA to evaluate using the Buckingham Branch Railroad for the proposed high speed passenger service, bypassing both Ashland and Staples Mill Road Stations. In 2009, Hanover County, Henrico County, the Town of Ashland, and Randolph-Macon College all opposed moving passenger service to the Buckingham Branch Railroad. In preparing the Draft EIS, FRA and DRPT reevaluated use of the Buckingham Branch Railroad, both as a potential passenger route and as a freight diversion route. FRA and DRPT dismissed alternatives using the Buckingham Branch Railroad from further consideration in the DC2RVA Draft EIS due to substantial impacts to wetlands, cultural resources, property, infrastructure, and rail operations. The Ashland/Hanover CAC also evaluated the Buckingham Branch Railroad for both passenger and/or freight diversion, and eliminated the use of the Buckingham Branch Railroad from their further consideration.

182. Refer to DRPT-numbered statement #179 for response.

work with State and Federal legislators to ensure the additional funding for this alternative is achieved. 182

5. Section 8.3.5.9 Vaughan Road (Ashland Station Replacement) states, "The existing Ashland station (see Section 8.3.5.11 below) lacks designated parking and other station facilities, and requires improvement to its platforms to comply with ADA and meet the DC2RVA Basis of Design for intercity passenger service." It should be noted in the DEIS and FEIS that the Town is working on a platform improvement project with Amtrak, CSX, and FRA that will begin construction in 2018 and fix/alleviate all the failings noted in the quoted description above. 183
6. Section 8.3.5.9 also states, "The site is currently undeveloped, but is zoned as a Neighborhood Commercial area along Archie Cannon Drive (an extension of Vaughan Road to the east, connecting to Route 1). The Town's Land Use Plan shows future use in the area to be medium and low density residential and neighborhood commercial." In the fall of 2016 the Town of Ashland rezoned the site away from neighborhood commercial and residential to light industrial. The site is now one of the top five economic development prospect sites in the State. The Town of Ashland therefore recommends the site remain dismissed from further consideration for a new Amtrak station. 184
7. Section 9.1 and 9.3.5 Suggests four alternatives be moved forward for the Ashland area. The Town would like the Deep Bore Tunnel added to those options brought forward for study, and would like to request the two options brought forth adding at grade track in Town be removed due to the overwhelming impacts they would have on the cultural, historic, and economic resources of the community. 185

Appendix G: Aerial Mapbooks of Build Alternatives Area 5 - Ashland

1. The maps associated with the "Maintain 2 Tracks Through Town" options show grade separated crossings at Vaughan and Ashcake. These improvements to the Vaughan Road Crossing re-orient the entrance to the Town Public Works facility and Hanover County Sewer Treatment plant in such a way that the new access road crosses through the Town owned land planned as "North Ashland Park". This park is incorrectly identified in Chapter 5: Section 4(f) Evaluation. The new entrance to the Town of Ashland Public Works facility would constitute a Section 4(f) use of the property planned for North Ashland Park. 186
2. The Aerial Mapbooks that show the grade separated crossing at Ashcake Road do not account for the Lance & Bridle development that has occurred along Giddy Up Lane. There appears to be at least one residential structure that would be a "take" if the grade separation were to occur has shown in the maps. This property should be identified throughout the DEIS under all options that include grade separation at Ashcake Road. 187
3. The Aerial Mapbooks for Option 5B which places an additional track to the east of the two existing railroad tracks shows a red track proposed and green permanent limits of disturbance line that would result in a substantial number of takings in downtown Ashland. The Town requests that these takings be represented through the DEIS to show the true impact in Alternative Area 5. 188

Appendix I: Operations Modeling

VIRGINIA DEQ (continued)

(Response to comment 182 on previous page)

183. Refer to DRPT-numbered statement #180 for response.

184. DRPT eliminated the area north of Vaughan Road for a new Ashland station as part of the alternatives analysis process and it was not considered as part of any of the Build Alternatives analyzed in the Draft EIS (refer to DRPT-numbered statement #150 for additional response). The Preferred Alternative for the Ashland Area is Build Alternative 5A: Maintain Two Tracks Through Town and, per the CTB resolution of December 6, 2017, will not include any modifications to the existing station location.

185. Refer to DRPT-numbered statement #179 for response. Build Alternatives 5B and 5D, each adding a track at grade through Ashland, have been evaluated in detail in the Draft EIS, and were not selected by FRA as the Preferred Alternative.

186. The North Ashland park polygon shown on Figure 3.14-1 in the Draft EIS was obtained from the VDOT CEDAR database – VA DCR "conservation land" dataset (July 2017). Section 4(f) applies when the land is one of the enumerated types of publicly owned lands and the public agency that owns the property has formally designated and determined it to be significant for park, recreation area, or wildlife and waterfowl refuge purposes. Evidence of formal designation would be the inclusion of the publicly owned land, and its function as a Section 4(f) property into a city or county Master Plan; an expression of interest or desire is not sufficient. While the North Ashland Park is included the Town of Ashland's Comprehensive Plan and Parks and Recreation Master Plan, the park location and boundaries are not clearly identified. Additional conversations in January 2018 with Mr. Joseph Collins, Town of Ashland Parks and Recreation Coordinator, indicate the development of North Ashland Park stalled several years ago due to the recession and the location for the development of the future park was never established. The future land use in this area is identified as a mix of government and open space. Given this information, this area would not be considered a Section 4(f) resource at this time. North Ashland Park has been removed as a Section 4(f) resource as indicated in the errata table for the Draft EIS, which is Appendix A of the Final EIS.

(Responses are continued on next page)

work with State and Federal legislators to ensure the additional funding for this alternative is achieved. 182

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Appendix I: Operations Modeling

VIRGINIA DEQ (continued)

187. The parcel affected in the vicinity of Giddy Up Lane is Parcel ID 7779-76-4998. It is the common area of the Lance and Bridle subdivision. There are no residential relocations in this area.

188. Partial parcel acquisition and one commercial relocation on Ashcake Road would occur under Build Alternative 5B as evaluated in the Draft EIS. However, Alternative 5A was selected as the Preferred Alternative for Area 5; refer to Final EIS Section 5.11 for impacts of the Preferred Alternative on Community Resources, including relocations.

1. Section 4.3 states, "DRPT's preliminary conclusion, based on the schedule, infrastructure, and operating parameters evaluated in this second phase of operations simulation was that, while a third main track through Ashland or a two-track bypass around Ashland would accommodate the Project's service and performance goals through 2045, other alternatives should be considered, perhaps in concert with service and schedule modifications, that could also achieve the Project's service and performance goals." This statement appears to be an attempt by DRPT to justify the two track no build option which is commonly referred to as the 3-2-3. The Town, and presumably the citizenry at large, would have to know significantly more about the "service and schedule modifications" that could make this option achieve the Project's service and performance goals before considering it valid. The Town would hope that FRA would similarly require DRPT to provide further explanation in the DEIS to explain this very vague justification for an alternative "that having only two main tracks in Fredericksburg and/or Ashland failed to dispatch (i.e., the operations simulation concluded that the infrastructure had insufficient capacity for the number of trains projected to operate in the corridor in the years 2045)." Once again, the Town would encourage DRPT and the FRA to consider the Deep Bore Tunnel if alternatives other than the third track through Ashland or two track bypass are to be considered. 189

Appendix Q: Community Impact Assessment Technical Report

1. Table 3-4: Community Facilities identifies zero (0) Community Center/Museum facilities in Hanover County. As noted above, the Town of Ashland requests that the Ashland Hanover Visitor Center be recognized throughout the DEIS and appendices as a community facility. 190
2. Section 4.2.1 states, "There would be no residential relocations, one commercial relocation, and partial acquisitions of parcels. The communities affected include downtown Ashland, southern Ashland, Gwathmey, and Elmont." The Town of Ashland requests that a more accurate count of relocations, closures and acquisitions occur within downtown Ashland to recognize the amount of "takes" and business closures that will occur with any option that brings additional rail capacity through downtown Ashland. 191
3. Section 4.2.2 states, "closure of College Avenue/Henry Clay Street would occur under Build Alternatives 5A, 5B, and 5C". The Town of Ashland requests that platforms in these scenarios only be considered as 350-foot so as to not close the College Avenue/Henry Clay Street crossing while also maintaining access to the Ashland Hanover Visitor Center and allowing for detour alternatives upon the need to closure the England Street crossing. 192

Appendix R: Cultural Resources Report

1. Due to the extensive amount of cultural resources affected in the Town of Ashland by any attempt to increase rail capacity through the ROW in downtown Ashland the Town of Ashland requests that any and all considerations of cultural resources as identified by the Ashland Museum be addressed in the DEIS and FEIS. 193

VIRGINIA DEQ (continued)

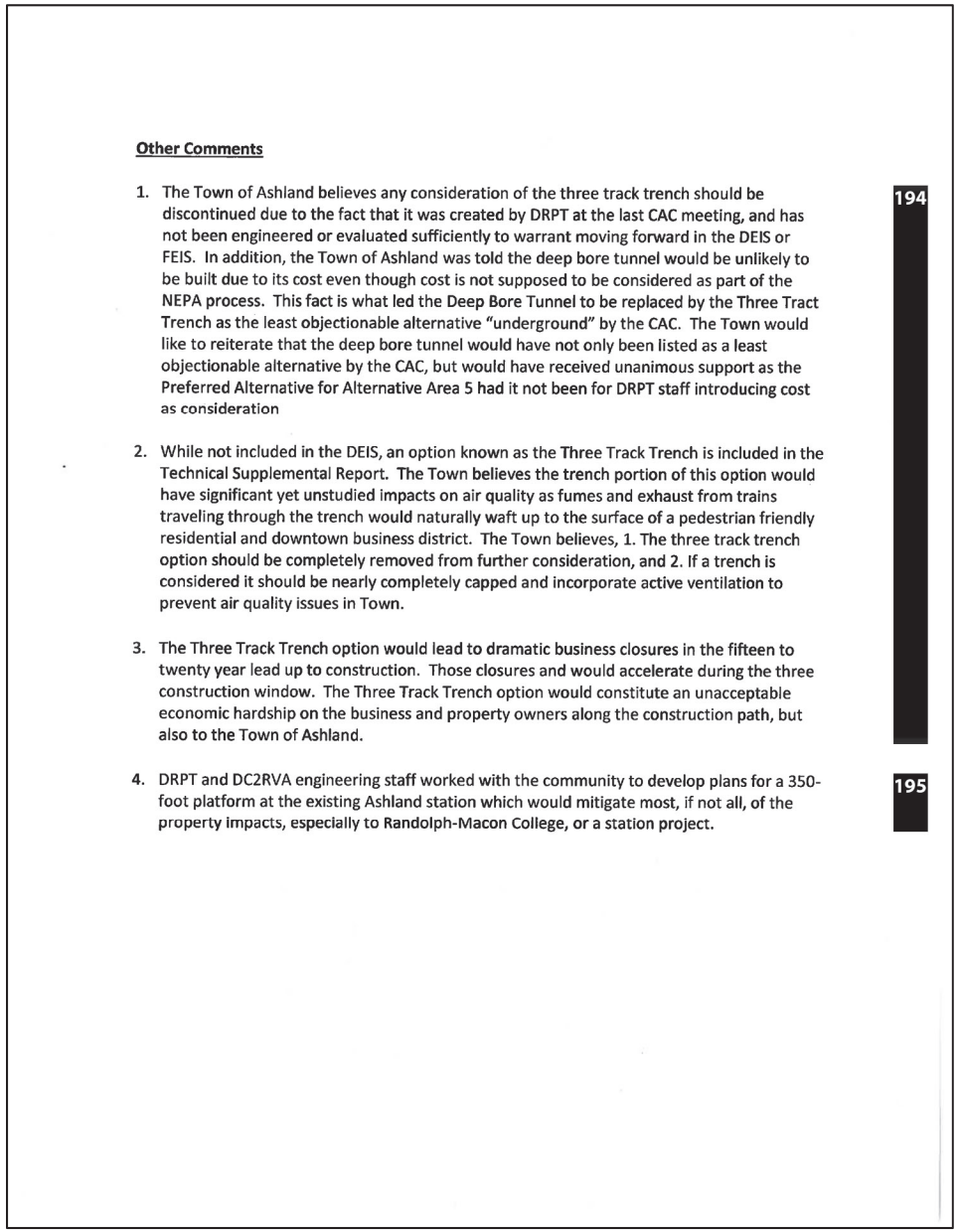
189. The comment was provided verbatim previously; refer to DRPT-numbered statement #156 for response.

190. and 191. The Ashland/Hanover Visitor Center would be relocated under one option evaluated in the Draft EIS, Build Alternative 5D. However, Alternative 5A is the Preferred Alternative for Area 5, which does not affect the existing Ashland/Hanover Visitor Center. The designation of the Ashland/Hanover Visitor Center to a community facility has been corrected; refer to the errata table for the Draft EIS, which is Appendix A to the Final EIS.

    The discussion of relocations, closures, and acquisitions in Appendix Q of the Draft EIS are accurate, other than as noted above.

192. Refer to DRPT-numbered statement #167 for response.

193. DRPT acknowledges the economic impact analysis that was conducted by a third party at the request of the Town, which DEQ has provided as an attachment to this letter. Refer to DRPT-numbered statement #236 for response.



Other Comments

1. The Town of Ashland believes any consideration of the three track trench should be discontinued due to the fact that it was created by DRPT at the last CAC meeting, and has not been engineered or evaluated sufficiently to warrant moving forward in the DEIS or FEIS. In addition, the Town of Ashland was told the deep bore tunnel would be unlikely to be built due to its cost even though cost is not supposed to be considered as part of the NEPA process. This fact is what led the Deep Bore Tunnel to be replaced by the Three Tract Trench as the least objectionable alternative "underground" by the CAC. The Town would like to reiterate that the deep bore tunnel would have not only been listed as a least objectionable alternative by the CAC, but would have received unanimous support as the Preferred Alternative for Alternative Area 5 had it not been for DRPT staff introducing cost as consideration

2. While not included in the DEIS, an option known as the Three Track Trench is included in the Technical Supplemental Report. The Town believes the trench portion of this option would have significant yet unstudied impacts on air quality as fumes and exhaust from trains traveling through the trench would naturally waft up to the surface of a pedestrian friendly residential and downtown business district. The Town believes, 1. The three track trench option should be completely removed from further consideration, and 2. If a trench is considered it should be nearly completely capped and incorporate active ventilation to prevent air quality issues in Town.

3. The Three Track Trench option would lead to dramatic business closures in the fifteen to twenty year lead up to construction. Those closures and would accelerate during the three construction window. The Three Track Trench option would constitute an unacceptable economic hardship on the business and property owners along the construction path, but also to the Town of Ashland.

4. DRPT and DC2RVA engineering staff worked with the community to develop plans for a 350-foot platform at the existing Ashland station which would mitigate most, if not all, of the property impacts, especially to Randolph-Macon College, or a station project.

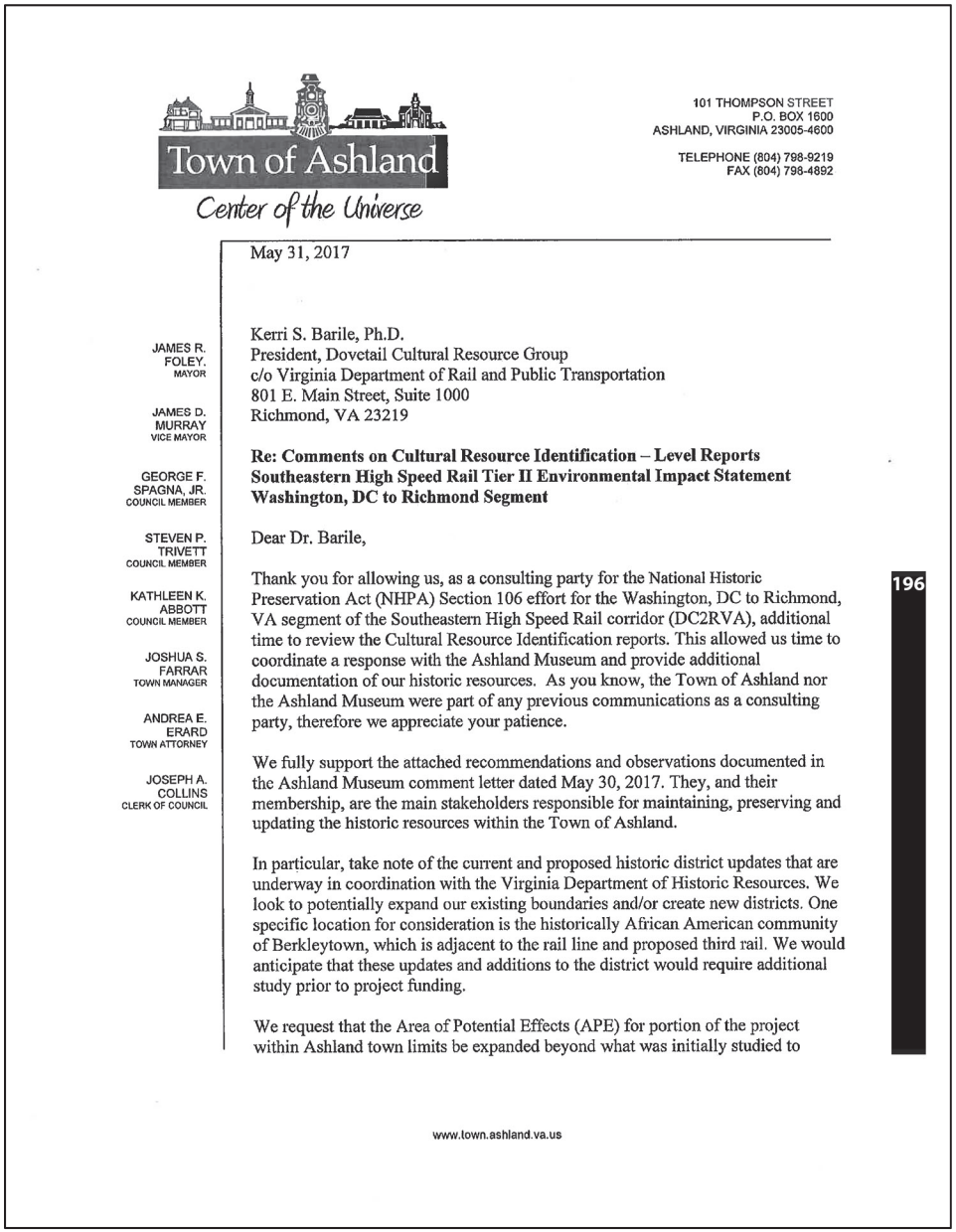
194

195

VIRGINIA DEQ (continued)

194. Refer to DRPT-numbered statements #178 and #179 for response.

195. Refer to DRPT-numbered statement #180 for response.



Town of Ashland
Center of the Universe

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ASHLAND, VIRGINIA 23005-4600

TELEPHONE (804) 798-9219
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May 31, 2017

Kerri S. Barile, Ph.D.
President, Dovetail Cultural Resource Group
c/o Virginia Department of Rail and Public Transportation
801 E. Main Street, Suite 1000
Richmond, VA 23219

Re: Comments on Cultural Resource Identification – Level Reports
Southeastern High Speed Rail Tier II Environmental Impact Statement
Washington, DC to Richmond Segment

Dear Dr. Barile,

196

Thank you for allowing us, as a consulting party for the National Historic Preservation Act (NHPA) Section 106 effort for the Washington, DC to Richmond, VA segment of the Southeastern High Speed Rail corridor (DC2RVA), additional time to review the Cultural Resource Identification reports. This allowed us time to coordinate a response with the Ashland Museum and provide additional documentation of our historic resources. As you know, the Town of Ashland nor the Ashland Museum were part of any previous communications as a consulting party, therefore we appreciate your patience.

We fully support the attached recommendations and observations documented in the Ashland Museum comment letter dated May 30, 2017. They, and their membership, are the main stakeholders responsible for maintaining, preserving and updating the historic resources within the Town of Ashland.

In particular, take note of the current and proposed historic district updates that are underway in coordination with the Virginia Department of Historic Resources. We look to potentially expand our existing boundaries and/or create new districts. One specific location for consideration is the historically African American community of Berkleytown, which is adjacent to the rail line and proposed third rail. We would anticipate that these updates and additions to the district would require additional study prior to project funding.

We request that the Area of Potential Effects (APE) for portion of the project within Ashland town limits be expanded beyond what was initially studied to

VIRGINIA DEQ (continued)

196. This letter was provided to DRPT prior to the publication of the Draft EIS (on September 8, 2017), and are not specific comments on the content of the Draft EIS. Between receiving this letter and publishing the Draft EIS, DRPT coordinated with the Town of Ashland to address the comments contained within this letter. The comments in this letter are addressed in analyses and documentation that represents the Draft EIS. Notwithstanding, additional details on this comment are included in the attachment from the Ashland Museum; refer to DRPT-numbered statements #201–235 for a detailed response.

encompass the larger impact that the construction of a third rail would present to our historic homes, businesses, and Randolph-Macon College. While structures in the central business district may not be physically impacted, access to them will be greatly limited. This area is our main historic retail district with shops and restaurants that are the gathering spot for citizens and visitors. Entrances via Center Street driveways to our historic homes will be removed. 196

Also, we request that additional resources identified in the Ashland Museum's letter be raised to the level of "potentially eligible" and consideration of specific trees, which shape the character of our community due their historic age and prominence in lining Center Street, be identified in the study as they would have to be removed or impacted during construction.

Thank you again for allowing us to provide comments on the significant impacts that a third rail would have to our historic resources. Please contact me at (804) 798-9219 or jfarrar@ashlandva.gov with any questions regarding our input.

Sincerely,

Joshua S. Farrar
Town Manager

cc. Ellen Wulf, Ashland Museum

VIRGINIA DEQ (continued)

(Response to comment 196 on previous page)

Attachment 1
Ashland Museum May 30, 2017, Comments

Phase IB Survey of Remaining Ashland Alternatives noted as Segment 13
We understand the studies of the project Area of Potential Effects (APE) are determined by project Limits of Disturbance (through August 2016 Plans). These surveys included "standard recordation of buildings, districts, structures, objects and sites within the APE per DHR (Department of Historic Resources) standards." We would like to comment as follows:

197

- The 1982 DHR Survey of Ashland for the nomination of the Ashland Historic District was flawed and incomplete in its identification of historic resources.

- There were addresses that did not exist (110 S. Railroad Ave. is perhaps 210 S. Railroad Ave.), some misspelled street names (St. James Street is really James Street), and some mistakes in the dates of some of the buildings. And, in the architectural history world at that time, there was almost no interest in garages, barns, and other secondary buildings. Since then, the members of the Ashland Museum have researched some of the houses, found interesting facts about the owners, and corrected the dates. Some of those buildings might even be eligible for individual listing under criteria A or B of the DHR's standards when DHR can evaluate our research.

- In the spring of 2017, we are going to have an updated survey of the original district, which will allow us to include more buildings in the district for three reasons. First, the dates of the contributing members in the original survey were mid-19th century to 1932—50 years from 1982. Now the dates are going to be up to 1967. Second, while we will not necessarily accept any building that is 50 years old, we will look at the best examples of unmodified Craftsman bungalows and other Craftsman style buildings, ranch or rambler style homes, and Art Deco architecture. Ashland Theatre (1948) and McArdle Insurance Building (1940s) are two that might be included. Third, there are a number of barns, garages or carriage houses, and other service buildings that will be considered for inclusion in the updated survey, where we can verify age and if the construction has not been substantially modified.

- In 2018, the Town in cooperation with the Ashland Museum will be expanding the district boundaries to include some structures on Thompson, Henry Clay, Howard, Racecourse, Berkley, Henry and other areas of town that contain significant buildings relating to the town history or that have interesting architecture. That would allow us to include Craftsmen commercial buildings such as Bryant's grocery, Jake Speer's gas station, and the Craftsmen bungalows on Thompson Street, for example. It might also include the Sears House on Berkeley Street and the Colman Hotel, now called the Elks Home on Henry Street and the Gandy School, a fine example of Prairie Style architecture. They tell part of our African-American story.

•The Area of Potential Effects (APE) does not fully reflect the devastating impacts the acquisition of expanded right of way and the construction of a third rail would have on the Ashland Historic District which is intended by the Virginia Department of Historic Resources and the National Department of Historic Places to be protected.

- The Town of Ashland community and the Randolph-Macon College campus would be irreparably split up the middle by the construction of a third rail destroying the integrity of both as viable entities.

- In the business district, a substantial number of historic and architecturally significant buildings along Railroad Avenue/Center Street would be significantly damaged. The business buildings are only about 30 or 40 feet from the center line of the railroad right of way. If a third rail is put through Ashland, the

VIRGINIA DEQ (continued)

197. Similar comments from the Ashland Museum were provided under separate cover from the Ashland Town Manager; refer to DRPT-numbered statement #197. Additional details on this comment are included in the attachment from the Ashland Museum; refer to DRPT-numbered statements #201 through #235 for detailed responses on these topics.

facades would have to be sheared off on whichever side of the street the third rail comes. At the very least the sidewalks that are extensions of the restaurants and shops today, would be reduced to 3 feet wide, barely enough room to walk single file. Ashland would lose its turn of the century business district.

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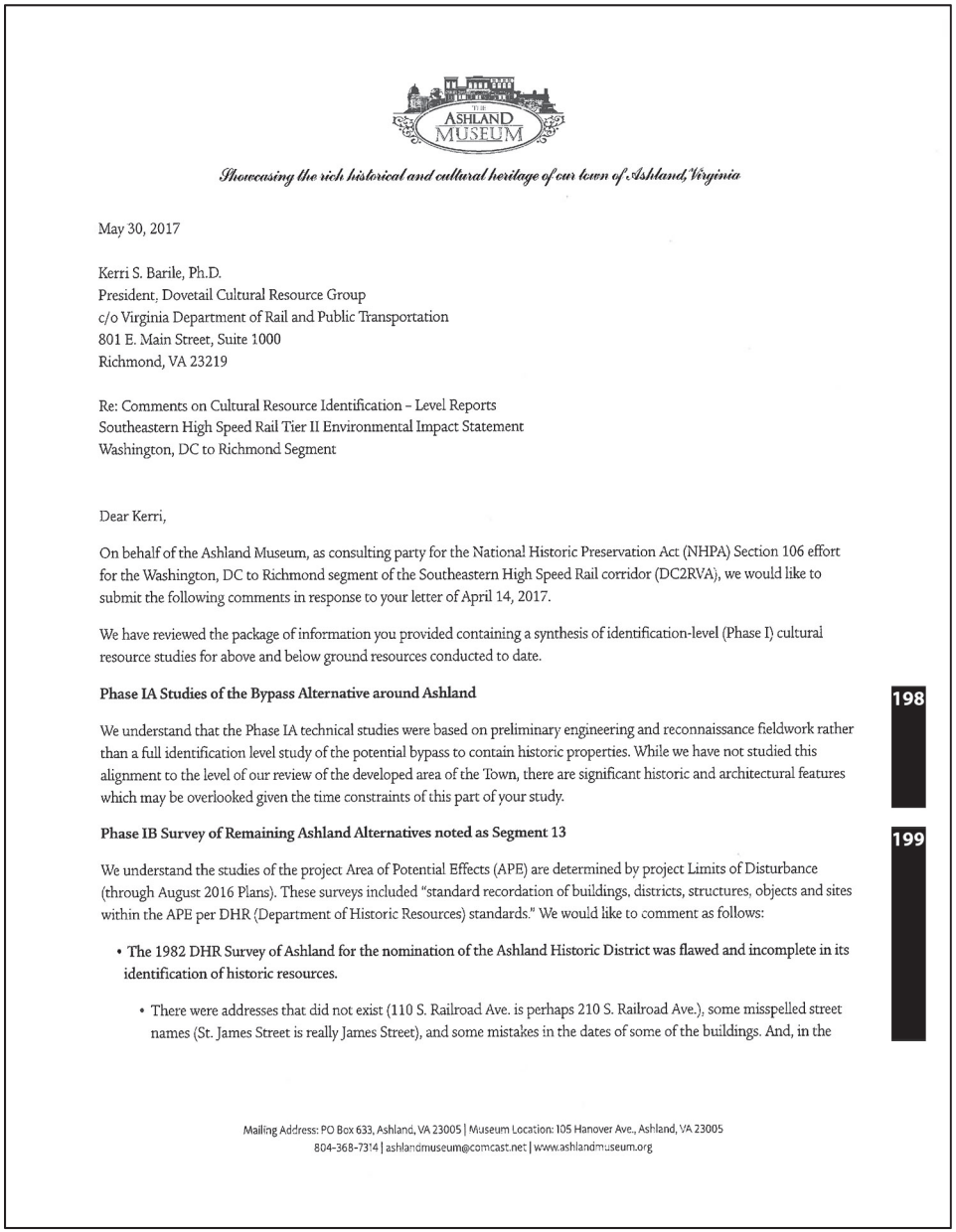
• In the residential area, the homes on Center Street, while not so close to the road, would have no way to access the fronts of their properties. Ashland would lose the streetscapes that show our best antebellum and High Victorian architecture, which happen to be some of the best examples in Virginia and the nation.

• The mature trees along Center Street are in many cases as old as the historic homes that they shade and their loss would irreparably change the streetscape and the ecological balance of the town.

VIRGINIA DEQ (continued)

(Response to comment 197 on previous page)



THE ASHLAND MUSEUM

Showcasing the rich historical and cultural heritage of our town of Ashland, Virginia

May 30, 2017

Kerri S. Barile, Ph.D.
President, Dovetail Cultural Resource Group
c/o Virginia Department of Rail and Public Transportation
801 E. Main Street, Suite 1000
Richmond, VA 23219

Re: Comments on Cultural Resource Identification – Level Reports
Southeastern High Speed Rail Tier II Environmental Impact Statement
Washington, DC to Richmond Segment

Dear Kerri,

On behalf of the Ashland Museum, as consulting party for the National Historic Preservation Act (NHPA) Section 106 effort for the Washington, DC to Richmond segment of the Southeastern High Speed Rail corridor (DC2RVA), we would like to submit the following comments in response to your letter of April 14, 2017.

We have reviewed the package of information you provided containing a synthesis of identification-level (Phase I) cultural resource studies for above and below ground resources conducted to date.

Phase IA Studies of the Bypass Alternative around Ashland 198

We understand that the Phase IA technical studies were based on preliminary engineering and reconnaissance fieldwork rather than a full identification level study of the potential bypass to contain historic properties. While we have not studied this alignment to the level of our review of the developed area of the Town, there are significant historic and architectural features which may be overlooked given the time constraints of this part of your study.

Phase IB Survey of Remaining Ashland Alternatives noted as Segment 13 199

We understand the studies of the project Area of Potential Effects (APE) are determined by project Limits of Disturbance (through August 2016 Plans). These surveys included "standard recordation of buildings, districts, structures, objects and sites within the APE per DHR (Department of Historic Resources) standards." We would like to comment as follows:

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804-368-7314 | ashlandmuseum@comcast.net | www.ashlandmuseum.org

VIRGINIA DEQ (continued)

198. The bypass was the subject of a Phase IA reconnaissance study rather than a full identification-level study as part of the Draft EIS process for numerous reasons, primarily due to the width of the bypass corridor and the archaeological best practice to avoid excavations where possible. It is fully understood that the Phase IA reconnaissance study is a planning document only and does not replace the need for full survey. Rather, this work identified areas that would require archaeological survey and above-ground resources needing study should this alternative be considered. Alternative 5A: Maintain Two Tracks Through Town (without station or roadway modifications between Vaughan Road and Ashcake Road) was selected as the Preferred Alternative for the Ashland Area (refer to Section 4.3.5 of the Final EIS for details on the selection process).

    Because the bypass was not selected as the Preferred Alternative, no additional cultural resource studies beyond the Phase IA study were necessary.

199. These comments were provided verbatim under separate cover; refer to DRPT-numbered statement #197.

architectural history world at that time, there was almost no interest in garages, barns, and other secondary buildings. Since then, the members of the Ashland Museum have researched some of the houses, found interesting facts about the owners, and corrected the dates. Some of those buildings might even be eligible for individual listing under criteria A or B of the DHR's standards when DHR can evaluate our research.

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- The Area of Potential Effects (APE) does not fully reflect the devastating impacts the acquisition of expanded right of way and the construction of a third rail would have on the Ashland Historic District which is intended by the Virginia Department of Historic Resources and the National Department of Historic Places to be protected.

  - The Town of Ashland community and the Randolph-Macon College campus would be irreparably split up the middle by the construction of a third rail destroying the integrity of both as viable entities.

  - In the business district, a substantial number of historic and architecturally significant buildings along Railroad Avenue/Center Street would be significantly damaged. The business buildings are only about 30 or 40 feet from the center line of the railroad right of way. If a third rail is put through Ashland, the facades would have to be sheared off on whichever side of the street the third rail comes. At the very least the sidewalks that are extensions of the restaurants and shops today, would be reduced to 3 feet wide, barely enough room to walk single file. Ashland would lose its turn of the century business district.

  - In the residential area, the homes on Center Street, while not so close to the road, would have no way to access the fronts of their properties. Ashland would lose the streetscapes that show our best antebellum and High Victorian architecture, which happen to be some of the best examples in Virginia and the nation.

199

Ashland Museum
Mailing Address: PO Box 633, Ashland, VA 23005 | Museum Location: 105 Hanover Ave., Ashland, VA 23005
804-368-7314 | ashlandmuseum@comcast.net | www.ashlandmuseum.org

VIRGINIA DEQ (continued)

(For response to comment 199, refer to page B-172)

- As Nancy Hugo states, the mature trees along Center Street are in many cases as old as the historic homes that they shade and their loss would irreparably change the streetscape and the ecological balance of the town.

199

We appreciate the opportunity to review the package of reports and information you provided. And we very much appreciate your efforts to discuss the resources identified and the process for their review. We hope that you will agree with our assessment that the construction of a third rail through the heart of the Ashland Historic District will have a devastating impact on the landscape and the historic and archeological resources of state and national significance.

Sincerely,

Rosanne Groat Shalf

Betsy Hodges

Attachments: Letter from Nancy Hugo
Letter from Theodore Sheckels
Ashland Museum Updates, Corrections, Additions and Comments to DC2RVA Table 6-1

cc: Garet Prior, Town of Asland
Nora Amos, Town of Ashland
Ellen Wulf, Ashland Museum
Alphine Jefferson, Hanover County Black Heritage Society
Robert Lindgren, Randolph-Macon College
Paul Davies, Randolph-Macon College

Ashland Museum
Mailing Address: PO Box 633, Ashland, VA 23005 | Museum Location: 105 Hanover Ave., Ashland, VA 23005
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VIRGINIA DEQ (continued)

(For response to comment 199, refer to page B-172)

VIRGINIA DEQ (continued)

(For response to comment 199, refer to page B-172)

NANCY ROSS HUGO
11208 GWATHMEY CHURCH RD., ASHLAND, VA 23005
(804) 798-6364 nhugo@earthlink.net

199

May 22, 2017

Dr. Kerri Barile, PhD
DC to Richmond Southeast High Speed Rail
801 East Main Street, Suite 1000
Richmond, Virginia 23219

Re: Phase 1 A Cultural Resources Survey for SEHSR, Washington D. C. to Richmond, Virginia,
Ashland Bypass (Segment 22)
VDHR File No. 2014-0666

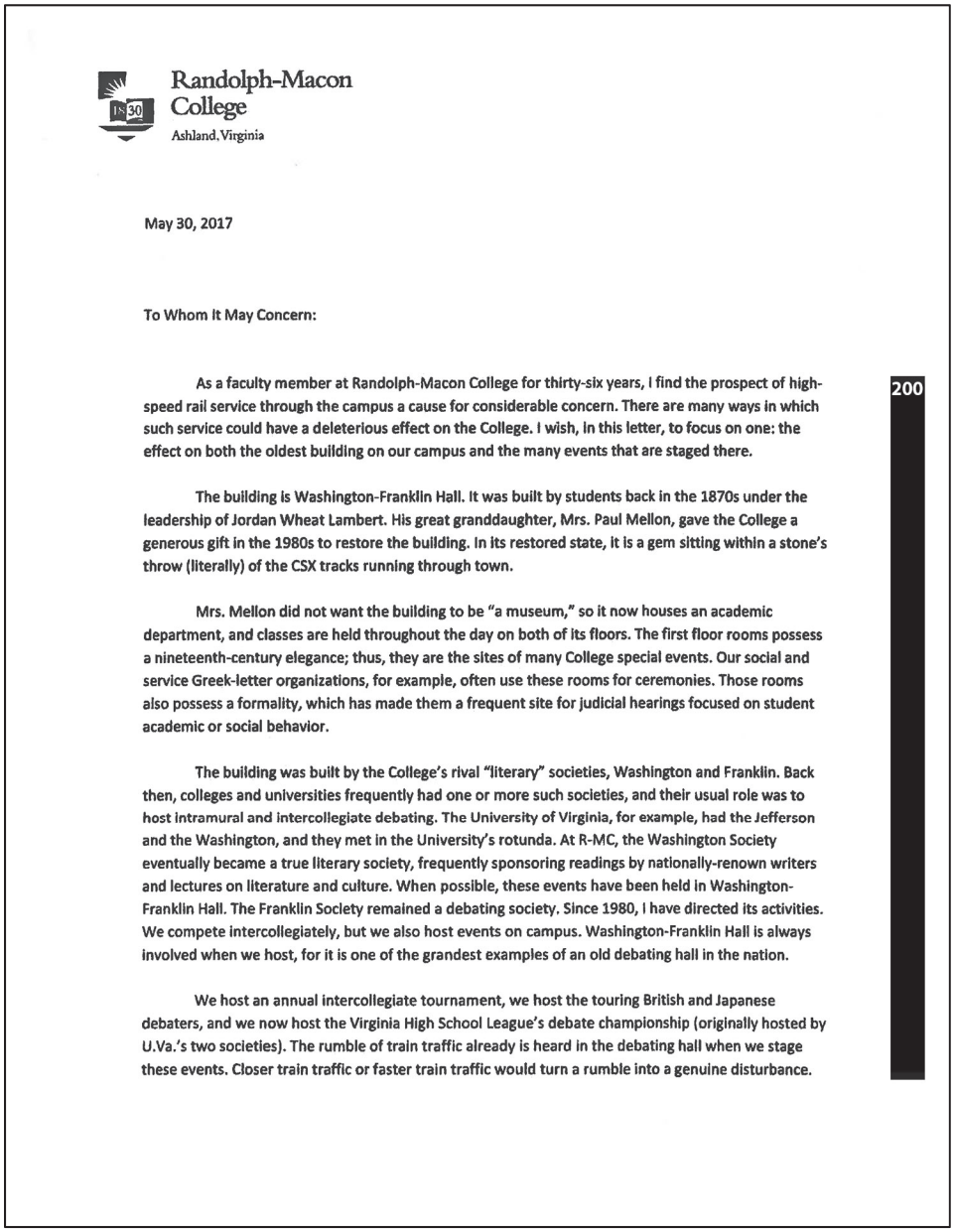
Dear Dr. Barile:

As an early (1982) member of Ashland, Virginia's streetscape committee, a resident of the Ashland community for over 40 years, and an advocate for trees in my professional and personal life, I would like to add information to what you may have already gathered regarding the impact of a third railway line along Center Street through the town of Ashland. I feel sure you have already collected, or will collect, information about our historic homes, thriving businesses, and college campus, which would all be negatively affected by such a project, but you may not have received information about the mature trees that line Center Street and of their value to our town.

Our entire town is rich in mature trees, but those along Center Street are particularly important in shading the sidewalks that run along our central thoroughfare and in anchoring the plantings that define our streetscape. Many of them—mature white oaks, red oaks, and willow oaks—are as old as the historic homes they shade (some are probably older), and their loss would irreparably change not only the way visitors and residents experience our town but the ecological balance of our town. As I am sure you know, towns and cities all over Virginia are striving to achieve the kind of tree canopy Ashland already has, and it would be a tragedy to deliberately destroy something Ashland has worked so hard to achieve. Please take a ride through Ashland to see not only these old trees, but new ones coming on in promise (evidence of our community's continuing commitment to trees). Please note, too, that in some areas Ashland has used expensive paving materials for sidewalks and parking areas in an effort to protect tree roots and better distribute water. We have spent tax dollars to protect these resources. A third rail through Ashland would destroy a significant percentage of these living landmarks. Please don't let that happen.

Sincerely,

Nancy Ross Hugo



Randolph-Macon College
Ashland, Virginia

May 30, 2017

To Whom It May Concern:

As a faculty member at Randolph-Macon College for thirty-six years, I find the prospect of high-speed rail service through the campus a cause for considerable concern. There are many ways in which such service could have a deleterious effect on the College. I wish, in this letter, to focus on one: the effect on both the oldest building on our campus and the many events that are staged there.

The building is Washington-Franklin Hall. It was built by students back in the 1870s under the leadership of Jordan Wheat Lambert. His great granddaughter, Mrs. Paul Mellon, gave the College a generous gift in the 1980s to restore the building. In its restored state, it is a gem sitting within a stone's throw (literally) of the CSX tracks running through town.

Mrs. Mellon did not want the building to be "a museum," so it now houses an academic department, and classes are held throughout the day on both of its floors. The first floor rooms possess a nineteenth-century elegance; thus, they are the sites of many College special events. Our social and service Greek-letter organizations, for example, often use these rooms for ceremonies. Those rooms also possess a formality, which has made them a frequent site for judicial hearings focused on student academic or social behavior.

The building was built by the College's rival "literary" societies, Washington and Franklin. Back then, colleges and universities frequently had one or more such societies, and their usual role was to host intramural and intercollegiate debating. The University of Virginia, for example, had the Jefferson and the Washington, and they met in the University's rotunda. At R-MC, the Washington Society eventually became a true literary society, frequently sponsoring readings by nationally-renown writers and lectures on literature and culture. When possible, these events have been held in Washington-Franklin Hall. The Franklin Society remained a debating society. Since 1980, I have directed its activities. We compete intercollegiately, but we also host events on campus. Washington-Franklin Hall is always involved when we host, for it is one of the grandest examples of an old debating hall in the nation.

We host an annual intercollegiate tournament, we host the touring British and Japanese debaters, and we now host the Virginia High School League's debate championship (originally hosted by U.Va.'s two societies). The rumble of train traffic already is heard in the debating hall when we stage these events. Closer train traffic or faster train traffic would turn a rumble into a genuine disturbance.

200

VIRGINIA DEQ (continued)

200. There are no physical impacts to this building under any of the Area 5 Build Alternatives, including the Preferred Alternative 5A: Maintain Two Tracks Through Town. University properties would be covered under relocations as an institutional entity (not business or community entities), but this is not applicable as the building is not being relocated as part of the Project.

The Project requires compliance with the National Historic Preservation Act of 1966. Since 2014, FRA and DRPT have been complying with this legislation, including Project initiation, determination of an area of potential effects (APE), archaeological studies with predictive model, and architectural identification- and evaluation-level surveys of the APE. All studies have been coordinated with DHR and details on these studies and the ensuing coordination can be found in Draft EIS Appendices R and U and Final EIS Appendices D, E, and K.

Randolph-Macon College and the Randolph-Macon extension are both historic properties within the Project APE. As such, DRPT evaluated impacts to these historic resources, both direct and indirect. FRA evaluated the potential impacts of the Project on these resources and determined that the Project will have no effect. DHR concurred with these determinations.

I'm not a civil engineer: I don't know what effect the traffic might have on the historic building, but I do fear that the traffic would bring everything inside to a halt. 200

Wash-Frank Hall, let me stress, is not just an historic building. It is a building that functions both daily and on special occasions. High-speed rail could well have a pronounced negative effect on this structure and its use. It is unfortunate that CSX tracks pass through the middle of a town—and a college campus, but they do. The railroad was central to both the town's and the college's development; thus, structures are close to it, not back thousands of feet. I would hope that those planning high-speed rail would recognize both the proximity of structures and the commercial, residential, and educational uses to which they are put in making plans.

Sincerely,

Theodore F. Sheckels, Ph.D.
Professor of English & Communication Studies
Chair, Department of Communication Studies

VIRGINIA DEQ (continued)

(Response to comment 200 on previous page)

Ashland Museum Updates, Corrections, Additions and Comments to DC2RVA Table 6-1

DHR Number	Name	City/County	Date of Construction	DC2RVA Project Team Recommendation
166-0001-0007	Hanover Bank Building, 104 N. Railroad Avenue	Ashland	c. 1919	Not Eligible, Contributes to Ashland Historic District

GIS # 7870-71-2693

DC2RVA: Not eligible, but it does contribute to the district.

Ashland Museum Comments: The former Hanover Bank Building was built in 1919 to replace the Bank's small frame structure at the same location. The style is the only Beaux Arts Structure in the town. The National Register nomination form states: "Its two-story temple front has paired columns, frieze, and pediment, while brick pilasters with cast-concrete capitals define the ends of the structure." *Because it is an example of a small town version of Beaux Arts in Virginia, we ask that you evaluate it as potentially eligible under Criteria A & C.*

201

DHR Number	Name	City/County	Date of Construction	DC2RVA Project Team Recommendation
166-0001-0008	Ashland Station Depot, 112 N. Railroad Avenue	Ashland	c. 1923	Potentially Eligible Under A & C; Contributes to Ashland Historic District

GIS # 7870-71-4742

DC2RVA: Potentially Eligible Under C; Contributes to Ashland Historic District

Ashland Museum Comments: This information is to bolster criterion A and C. Built by W. Duncan Lee, Ashland native son and Richmond architect, *the Ashland Station is significant nationally under Criterion A because it is an example of segregated and "separate but equal" architecture.* It was featured in the Smithsonian 1980s exhibit "Field to Factory: the Black Migration North from 1915 to 1940," *so it should be considered as potentially eligible under Criterion A.* Ashland Station is also an exceptional example regionally of Dutch Colonial Revival public architecture, so it should be considered potentially eligible under Criterion C.

202

DHR Number	Name	City/County	Date of Construction	DC2RVA Project Team Recommendation
166-0001-0011	House, 206 N. Center Street	Ashland	c. 1870	Not Eligible; Contributes to Ashland Historic District

GIS # 7870-73-2227

DC2RVA: Not Eligible; Contributes to Ashland Historic District.

Ashland Museum Comments: 206 N. Center Street was built during or shortly after the Civil War. William James was a "Strong Republican"—a Southern Union Sympathizer—lived there beginning about 1867. After the Civil War, James was appointed Collector of the Revenue for the Richmond area. In 1867, James and former slave and African-American church leader Burwell Toler were elected delegates for District 5, which included Hanover County, to the 1867 Virginia Constitutional Convention that eventually extended the vote to all males citizens. It also established a state school system. James' daughter Jennie James and her new husband Ira Ayers Jr. moved to Ashland to join her parents when Ayers was appointed to head the Ashland office of the Freedmen's Bureau during Reconstruction about 1867. Ayers proved to be a sympathetic administrator for the poor black and white families in the area, helping to feed and clothe many and also encouraging blacks to register for election and to establish schools, which they did. The school at Ashland's Shiloh Baptist Church was the first. *This house should be considered potentially eligible under Criterion A.* We believe the house was renovated, or updated around the turn of the century to include Colonial Revival columns. The interior grand center staircase has statuettes holding lights. The interior is largely original. *It may be eligible under Criterion C.*

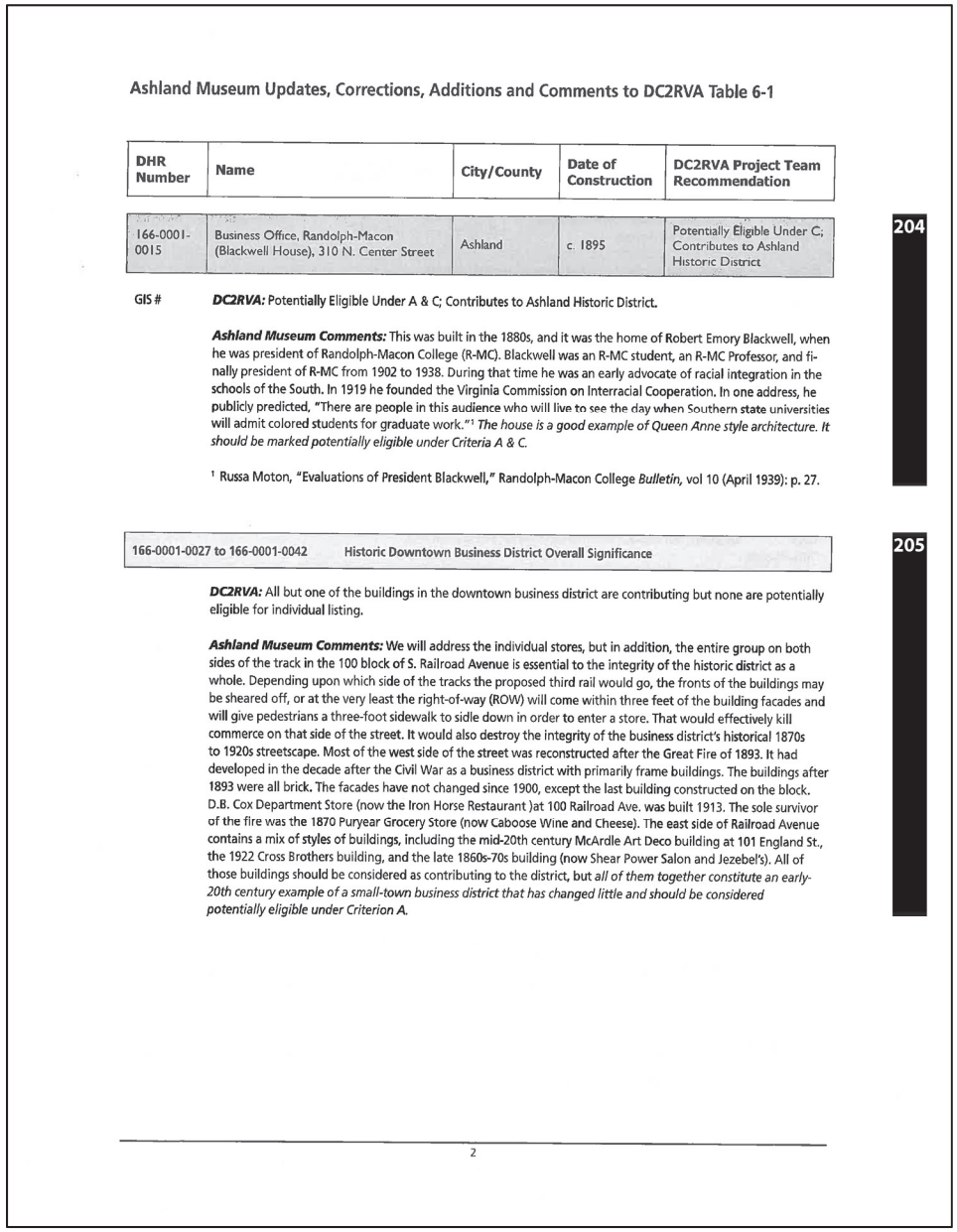
203

1

VIRGINIA DEQ (continued)

201. through 235. DRPT commenced coordination with the Ashland Museum in January 2015 and has continued a dialogue with the Museum and the Town of Ashland since that time. Beyond documents sent to all consulting parties, DRPT held one-on-one calls and meetings due to the sensitive nature of cultural resources in this area. On May 12, 2017, DRPT held a call between the team and the Town planning department to discuss the Section 106 process. On May 15, 2017, DRPT held a follow-up call with representatives from the Town and Ashland Museum. During these calls, DRPT presented information on the legal parameters of the studies as well as information on the Project findings. In turn, the Town and Museum presented data on the history of their community and their concerns regarding cultural resources. One item that was discussed was a concurrent investigation (as of the summer of 2017) of architectural properties in the historic district. The Town and DHR had teamed to host a cost-share project to resurvey the Ashland Historic District, evaluate the resources within the district, and make recommendations on boundary changes for the district, if appropriate. Commonwealth Heritage Group was selected to do this work. Because of the nature of the projects, the cost share resurvey project area and the DC2RVA Project area overlapped. DRPT reviewed the results of the cost share resurvey project upon completion and compared the results to the DC2RVA work. The results were discussed with the Town of Ashland, Ashland Museum, and DHR extensively.

(Responses are continued on next page)



Ashland Museum Updates, Corrections, Additions and Comments to DC2RVA Table 6-1

DHR Number	Name	City/County	Date of Construction	DC2RVA Project Team Recommendation
166-0001-0015	Business Office, Randolph-Macon (Blackwell House), 310 N. Center Street	Ashland	c. 1895	Potentially Eligible Under C; Contributes to Ashland Historic District

204

GIS #

DC2RVA: Potentially Eligible Under A & C; Contributes to Ashland Historic District.

Ashland Museum Comments: This was built in the 1880s, and it was the home of Robert Emory Blackwell, when he was president of Randolph-Macon College (R-MC). Blackwell was an R-MC student, an R-MC Professor, and finally president of R-MC from 1902 to 1938. During that time he was an early advocate of racial integration in the schools of the South. In 1919 he founded the Virginia Commission on Interracial Cooperation. In one address, he publicly predicted, "There are people in this audience who will live to see the day when Southern state universities will admit colored students for graduate work."[1] *The house is a good example of Queen Anne style architecture. It should be marked potentially eligible under Criteria A & C.*

[1] Russa Moton, "Evaluations of President Blackwell," Randolph-Macon College *Bulletin,* vol 10 (April 1939): p. 27.

166-0001-0027 to 166-0001-0042	Historic Downtown Business District Overall Significance

205

DC2RVA: All but one of the buildings in the downtown business district are contributing but none are potentially eligible for individual listing.

Ashland Museum Comments: We will address the individual stores, but in addition, the entire group on both sides of the track in the 100 block of S. Railroad Avenue is essential to the integrity of the historic district as a whole. Depending upon which side of the tracks the proposed third rail would go, the fronts of the buildings may be sheared off, or at the very least the right-of-way (ROW) will come within three feet of the building facades and will give pedestrians a three-foot sidewalk to sidle down in order to enter a store. That would effectively kill commerce on that side of the street. It would also destroy the integrity of the business district's historical 1870s to 1920s streetscape. Most of the west side of the street was reconstructed after the Great Fire of 1893. It had developed in the decade after the Civil War as a business district with primarily frame buildings. The buildings after 1893 were all brick. The facades have not changed since 1900, except the last building constructed on the block. D.B. Cox Department Store (now the Iron Horse Restaurant)at 100 Railroad Ave. was built 1913. The sole survivor of the fire was the 1870 Puryear Grocery Store (now Caboose Wine and Cheese). The east side of Railroad Avenue contains a mix of styles of buildings, including the mid-20th century McArdle Art Deco building at 101 England St., the 1922 Cross Brothers building, and the late 1860s-70s building (now Shear Power Salon and Jezebel's). All of those buildings should be considered as contributing to the district, but *all of them together constitute an early-20th century example of a small-town business district that has changed little and should be considered potentially eligible under Criterion A.*

2

VIRGINIA DEQ (continued)

DRPT received written comments on the technical reports from the Town of Ashland on May 31, 2017 and from the Ashland Museum on May 30 and June 19, 2017. DRPT evaluated all comments in light of the Commonwealth study and the DHR determinations on NRHP eligibility. On October 11, 2017, DRPT held a consulting party meeting in Ashland with representatives of the Town, Ashland Museum, and Hanover County present. During this meeting, DRPT presented the results of their investigations on the data presented by the Town and Ashland Museum in their May 30, May 31, and June 19 letters. In sum, the cost-share resurvey project, presented the same NRHP eligibility recommendations in their documents as DRPT on all resources within the DC2RVA area of potential effects (APE). In addition, DRPT met with the DHR to discuss the letters on July 26, 2017 and go over the Town and Museum's concerns. The DHR elected to not expand the APE and said that the matching NRHP determinations presented by DRPT and the cost-share resurvey project appeared accurate. No changes in eligibility were made by the DHR at this time. Upon hearing these results at the October 11 meeting, the Town stated that the results of this subsequent study appeared valid and satiated their concerns. The Museum did not concur but stated that they appreciated the follow up. Given the results of these investigations, the APE was only expanded in those few cases where DRPT adjusted the limits of disturbance (LOD). In general, the APE in Ashland was not expanded beyond the Draft EIS limits and the previous NRHP eligibility results for resources studied for the Draft EIS were not changed. However, additional studies in areas where the LOD has been modified since the Draft EIS were completed, and the results were sent to all consulting parties for comment. These results are also presented in the Final EIS. The results of the additional LOD studies were coordinated with the Ashland Museum and Town of Ashland through emails, telephone calls, and in – person meetings. See Chapter 5 and Appendix E of the Final EIS for additional details.

Ashland Museum Updates, Corrections, Additions and Comments to DC2RVA Table 6-1

DHR Number	Name	City/County	Date of Construction	DC2RVA Project Team Recommendation
166-0001-0027	Commercial Building (Smile of Virginia), 105 S. Railroad Avenue	Ashland	c. 1950	Not Eligible; Contributes to Ashland Historic District

206

GIS # 7870-71-5430

DC2RVA: Not eligible, but it does contribute to the district.

The address, date and current occupant above for DHR Number 166-0001-0027 is incorrect. For this DHR Number, the address is 101 England St. It is a commercial building, but it was built ca. 1925. Current occupant is McArdle & Associates Insurance.

Ashland Museum Comments: Agree.

207

166-0001-0030	Cross Brothers Grocery, 107 S. Railroad Avenue	Ashland	c. 1900	Not Eligible; Contributes to Ashland Historic District
166-0001-0033	Commercial Building (Cross Brothers Grocery), 109 S. Railroad Avenue	Ashland	c. 1950	Not Eligible; Contributes to Ashland Historic District

GIS # 7870-71-5324

DC2RVA: Not Eligible; Contributes to Ashland Historic District.

Ashland Historic District 2017 Survey Update Evaluation: The building at 107 S. Railroad Ave. should be considered contributing.

Ashland Museum Comments: Cross Brothers occupied a smaller building here from 1912, when it was first founded, to 1922, when they rebuilt and enlarged. The new building was two-stories with an external stairway on the south side. You can see it on the 1922 photo and the 1929 Sanborn map. At some point there was an A&P Grocery Store to the north (seen in the 1922 picture, below left) and then later A&P moved to the south (1930s-40s picture, below right) of the Cross Brothers building. Cross Brothers bought the A&P building to the south and combined it with their own building, enclosing what used to be the stairs. That became the single story annex of the Cross Brothers Building. *Because of its age and that the original portion of the building has not been substantially altered, it should be considered contributing.*

3

VIRGINIA DEQ (continued)

(For response to comments 201 through 235, refer to pages B-178 and B-179)

VIRGINIA DEQ (continued)

(For response to comments 201 through 235, refer to pages B-178 and B-179)

Ashland Museum Updates, Corrections, Additions and Comments to DC2RVA Table 6-1

DHR Number	Name	City/County	Date of Construction	DC2RVA Project Team Recommendation
166-0001-0035	Commercial Building (Hometown Realty), 111 S. Railroad Avenue	Ashland	c. 1900	Not Eligible; Contributes to Ashland Historic District

208

GIS # 7870-71-5330

DC2RVA: Not Eligible; Contributes to Ashland Historic District.

Ashland Historic District 2017 Survey Update Evaluation: According to local histories, the core of this building was built ca. 1900 with a mid-20th century storefront alteration. This alteration dates to within the historic district's period of significance and does not damage the building's integrity of design. This building is *recommended as a contributing resource to the Ashland Historic District.*

Ashland Museum Comments: This building appears as part of the general store at 113 S. Railroad Ave. in the 1908 Sanborn Insurance Map. In the 1921 Sanborn map is a separate building, still adjacent 113 S. Railroad Ave. and is listed as a cobbler shop. It remained a separate store through the 1941 map. *Because of its age, it should be considered a contributing resource.*

166-0001-0036	Commercial Building, 113 S. Railroad Avenue	Ashland	c. 1900	Not Eligible; Contributes to Ashland Historic District

209

GIS # 7870-71-4278

DC2RVA: Not Eligible; Contributes to Ashland Historic District.

Ashland Historic District 2017 Survey Update Evaluation: "As it reflects the history of this area and retains its integrity, it is recommended to remain a contributing resource within this district."

Ashland Museum Comments: The Louis Delarue family came to Ashland shortly after the Civil War and purchased a general store assessed at $1,500 on the corner of Robinson and Railroad Avenue in 1878. There had been a store there from at least 1863. The tax records for this period are spotty. It is hard to say whether this is the same building as the 1863 building because it was added to and subdivided several times. Regardless, it predates all of the buildings on either side of the tracks in the 100 block of S. Railroad Avenue. The 1908 Sanborn Insurance map shows it with a front porch. This building, with its arched windows and stucco trim has been a consistent part of the Historic Downtown Business District from at least 1878 and probably earlier. *Because of its distinctive architecture and age and continued use as a commercial building, this should be considered as contributing to the district and potentially eligible under Criterion C.*

166-0001-0040	Store, 307 S. Railroad Avenue	Ashland	c. 1910	Not Eligible; Contributes to Ashland Historic District
166-0001-0041	House, 403 S. Center Street	Ashland	c. 1875	Not Eligible; Contributes to Ashland Historic District

210

GIS # 7870-70-4807 *(307 S. RR)* 7870-70-3778 *(403 S. RR)*

DC2RVA: Not Eligible; Contributes to Ashland Historic District.

Ashland Museum Comments: Both 307 S. Railroad Ave. and 403 S. Center St. are examples of a home/business structure. The dwelling at 403 S. Center St. was built in 1858. Amos N. Lonsberry purchased it after the Civil War and he added the storefront in 1871 for his bakery. The structure at 307 Railroad Ave. could have been built as early as 1871 and as late as 1899. This kind of building was not uncommon in small towns before 1900, but it is uncommon now. *Both of these buildings should be considered potentially eligible under Criterion A as well.* While 307 S. Railroad Ave. is still used as both a commercial establishment and apartments, the entire 403 S. Center St. building is now a residence.

4

VIRGINIA DEQ (continued)

(For response to comments 201 through 235, refer to pages B-178 and B-179)

Ashland Museum Updates, Corrections, Additions and Comments to DC2RVA Table 6-1

DHR Number	Name	City/County	Date of Construction	DC2RVA Project Team Recommendation
166-0001-0055	House, 702 S. Center Street	Ashland	c. 1850	Potentially Eligible Under C; Contributes to Ashland Historic District

211

GIS # 7870-71-4278

DC2RVA: Potentially Eligible Under C; Contributes to Ashland Historic District

Ashland Historic District 2017 Survey Update Evaluation: Potentially Eligible Under C—"outstanding example of Second Empire-styled architecture."

Ashland Museum Comments: Should be eligible under C.

166-0001-0058	House, 706 S. Center Street	Ashland	c. 1868	Not Eligible; Contributes to Ashland Historic District

212

GIS # 7779-69-8956

DC2RVA: Not Eligible; Contributes to Ashland Historic District

Ashland Historic District 2017 Survey Update Evaluation: "The resource is one of a few examples of Second Empire style in the Ashland Historic District; however, replacement windows and siding have negatively impacted its historic integrity *[This is wrong. See correction below.]* and better examples are found elsewhere in town. For these reasons it is recommended not eligible for individual listing in the NRHP under Criterion C. It has no known association with any events or individuals of historical significance and is therefore recommended not eligible for the NRHP under Criteria A and B."

Ashland Museum Comments: **The renovation did not add siding or put in replacement windows.** In a 2017 renovation, super low-profile storm windows were installed to protect the original window. Built in 1858, this house was modified with a mansard roof and other changes in 1870 by Sarah Elmira Royster Shelton. She was a widow when she bought it and moved there with her daughter and son-in-law. In early 2017 it was renovated. It retains original siding, windows, and window and door frame surrounds inside and out. Because it is one of the better examples of Second Empire architecture in the town, it should be considered as potentially eligible under Criterion C. It had been a boarding house when previously evaluated so it was not in good shape. Sarah Shelton herself has national and regional significance because she was the inspiration for "Tamerlane," Edgar Allen Poe's first major work. She and Poe were childhood sweethearts in Richmond. When Poe went away to UVA for his education, her parents intercepted their letters and both thought the other had forgotten their promises to each other. When Poe returned home and found that his Elmira had wed wealthy Alexander Shelton, he was heart-broken and he wrote "Tamerlane," about a lover who was abandoned by his sweetheart. After many years, both widowed, they came together again and considered marriage, but first Poe had to go on a business trip to Baltimore where he died. Because of this association, this house should be designated as potentially eligible under Criterion B.[2]

Date of construction is listed incorrectly. The house was built in 1858, not 1868.

[2] Agnes Bondurant, *Poe's Richmond* (Richmond: Poe Associates, 1978), pp 224-227; Kenneth Silverman, *Edgar A. Poe: Mournful and Never-ending Remembrance* (New York: Harper Collins Publishers, 1991), pp 30-40. "To One in Paradise" and "The Ballad" also may pertain to Sarah Elmira Shelton.

5

VIRGINIA DEQ (continued)

(For response to comments 201 through 235, refer to pages B-178 and B-179)

Ashland Museum Updates, Corrections, Additions and Comments to DC2RVA Table 6-1

DHR Number	Name	City/County	Date of Construction	DC2RVA Project Team Recommendation
166-0001-0060	House, 708 S. Center Street	Ashland	c. 1894	Potentially Eligible Under C; Contributes to Ashland Historic District

213

GIS # 7779-69-8842

DC2RVA: Potentially Eligible Under C; Contributes to Ashland Historic District

Ashland Historic District 2017 Survey Update Evaluation: "outstanding example of a Colonial Revival-styled dwelling with Free Classic elements in this historic community (VHLC 1982). Minor modifications appear to have been made to this resource since it was constructed, including a few small rear additions, but these alterations do not appear to have negatively impacted its historic integrity. As the best example of this style within the Ashland Historic District, this property is recommended potentially eligible for individually listing on the NRHP under Criterion C.

Ashland Museum Comments: Architect was Julian Powers Fox, a respected Richmond architect. He built this house for his brother Flemming Fox. *As an example of Dutch Colonial Revival architecture and one designed by Julian Powers Fox, it should be listed as potentially eligible under Criterion C.*

166-0001-0077	House, 1005 S. Center Street	Ashland	c. 1890	Potentially Eligible Under C; Contributes to Ashland Historic District

214

GIS # 7779-68-9418

DC2RVA: Potentially Eligible Under C; Contributes to Ashland Historic District

Ashland Historic District 2017 Survey Update Evaluation: "It is not known if this house was designed by an architect, but it possesses characteristics of the Queen Anne style while its form suggests an earlier construction date. Further, the property's spatial organization reflects more of a rural setting like that attributed to the town during its time as a mid- to late-19th-century resort community. Therefore, this property is recommended for further study and is potentially eligible for listing on the NRHP under Criterion C at the local level."

Ashland Museum Comments: Assessor says this house was built just after the Civil War in 1867. *Should be potentially eligible under Criterion C.*

166-0001-0232	Commercial Building, 103–109 England Street	Ashland	c. 1950	Not Eligible, Contributes to Ashland Historic District

215

GIS # 7870-71-5430 (103) 7870-71-5491 (107) 7870-71-6412 (109)

DC2RVA: Not Eligible; Contributes to Ashland Historic District.

Ashland Historic District 2017 Survey Update Evaluation: According to local histories, these commercial buildings were built in 1925. They are examples of early twentieth century Commercial Style with red tile false shed roofs. The storefronts have been altered, including the addition of Permastone to 103 England Street. This resource retains its integrity of form, design, location, setting, association, and feeling. This building is recommended as a contributing resource to the Ashland Historic District as an example of a vernacular mid-nineteenth century dwelling under Criterion C of the NRHP

Ashland Museum Comments: Agree.

6

VIRGINIA DEQ (continued)

(For response to comments 201 through 235, refer to pages B-178 and B-179)

Ashland Museum Updates, Corrections, Additions and Comments to DC2RVA Table 6-1

DHR Number	Name	City/County	Date of Construction	DC2RVA Project Team Recommendation
166-0002	Randolph-Macon College Historic District	Ashland	late 19th c. - early 20th c.	Listed VLR & NRHP; Contributes to Ashland Historic District

216

GIS #

DC2RVA: Listed VLR & NRHP; Contributes to Ashland Historic District

Dates are listed above are incorrect. Correct dates are 1872-1879. The Randolph-Macon College Historic District continues to be a separate historic district.

Ashland Historic District 2017 Survey Update Evaluation: Potentially Eligible Under A & C; Contributes to R-MC Historic District

Ashland Museum Comments: This is additional information to bolster the criteria A&C. First, the lawn of the R-MC Historic District with very old oak and maple trees, reflects the ambiance of a mid-19th century college campus. Today it is used for college gatherings because it is shaded and can hold a large number of people. To cut into that lawn would damage the ambiance and curtail the use. As for the individual buildings, they are all contributing to their district, but because of their history and the people associated with them, they should be considered individually under Criteria A, B, and C to be potentially eligible.

Washington Franklin Literary Societies Hall, 1872, Italianate with Bonnet Roof. B.F. Price, Alexandria Architect. Significant under Criterion B because Jordan Wheat Lambert, who was president of the Franklin Literary Society, and leader in the construction of the building, went on to found Lambert Pharmaceuticals and along with Lister he created Listerine. Lambert's parents had employed Price to build their home in Alexandria. Significant under Criterion A to larger education history because it is an example of early to mid-19th century college literary society activity on many US college campuses. Most have dissolved, but Washington Franklin Literary Societies Hall is still used by the two societies for lectures and debates. In addition, it is also offices and lecture halls of the history department.

Duncan Memorial Chapel. William West, Richmond Architect. 1879. Ecclesiastic Gothic style.

Pace Lecture Hall. 1876. Italianate style. Originally one first floor room was dedicated to chemistry labs, unusual for small colleges at the time.

These properties should be considered potentially eligible under criterion A, B, and C.

166-0036; 166-0001-0063	MacMurdo House, 713 S. Center Street	Ashland	c. 1858	Potentially Eligible Under B and C; Contributes to Ashland Historic District

217

GIS # 7779-79-1601

DC2RVA: Potentially Eligible Under B and C; Contributes to Ashland Historic District

Ashland Historic District 2017 Survey Update Evaluation: Recommended under B & C "constructed for RF&P Treasurer, Waldrop Macmurdo, who also had his office built across the railroad for his convenience (Lancaster 1953). This house has been identified as one of very few Greek Revival-styled dwellings in the historic district (VHLC 1982). Therefore, this property is recommended for further study and is considered potentially eligible for listing on the NRHP under B&C."

Ashland Museum Comments: As the home of C. Waldrop Macmurdo, an early Treasurer of the RF&P, it should be potentially eligible under Criterion B. As a fine example of an un-modified Greek Revival-styled dwelling, it should be potentially eligible under Criterion C.

7

VIRGINIA DEQ (continued)

(For response to comments 201 through 235, refer to pages B-178 and B-179)

Ashland Museum Updates, Corrections, Additions and Comments to DC2RVA Table 6-1

DHR Number	Name	City/County	Date of Construction	DC2RVA Project Team Recommendation
166-0037; 166-0001-0073	Hugo House . 904 S. Center Street	Ashland	c. 1886	Potentially Eligible Under C; Contributes to Ashland Historic District

218

GIS # 7779-68-6848

DC2RVA: Potentially Eligible Under A, B, and C; Contributes to Ashland Historic District

Ashland Museum Comments: Lila Vance Lefebvre, headmistress of Edgeworth French Finishing School in Baltimore, bought newly constructed 904 S. Center St. for her stepdaughter Mary's husband, William Isaacs, and his daughters after Mary had died. Her granddaughter, Lila Lefebvre Isaacs, was soon courted by John Skelton Williams, the creator and president of Seaboard Air Line Railway and later an undersecretary of the Treasury and Comptroller of the Currency under the Wilson administration. Their wedding took place in the S. Center Street house and in the midst of the festivities the couple walked across the lawn and boarded a train to Washington for their honeymoon.[3] *As the home of the wife of John Skelton Williams, this property should be eligible under Criterion A.* The tin house in the back yard is where acetylene gas was made and then piped into the house for lighting. A tank of calcium carbide was kept in the tin house along with a tank of water. The water was allowed to drip on the carbide to create the gas. Holes for the pipes are still visable.[4] The dwelling, as an extraordinary example of Queen Anne style architecture, and the gas house in the yard, as an example of an early domestic acetylene gas apparatus, should be potentially eligible under Criterion A and C.

[3] Interview with John Skelton Williams Jr. by Rosanne Groat Shalf.
[4] Interview with Clifford Fleet of Richmond by Rosanne Groat Shalf.

166-0039; 166-0001-0082	Blair House, 1014 S. Center Street	Ashland	c. 1888	Not Eligible; Contributes to Ashland Historic District

219

GIS # 7779-68-3016

DC2RVA: Not Eligible; Contributes to Ashland Historic District

Ashland Museum Comments: Built in 1890 in the Queen Anne or Eastlake style, this house has undergone changes and subsequent renovations that restored the changes. When the Hendrixsons purchased it in 2007, the previous owners had removed the southern wrap-around portion of the porch because it had rotted. Using a photo of the original house, they restored the wrap-around porch, adding a turret roof. There have been sensitive rear additions, but otherwise the original house is much the same. *Because it is such a fine example of Eastlake, this should be considered potentially eligible under Criterion C.*

8

Ashland Museum Updates, Corrections, Additions and Comments to DC2RVA Table 6-1

DHR Number	Name	City/County	Date of Construction	DC2RVA Project Team Recommendation
166-0040; 166-0001-0044	Hanover Arts Center (Ashland Baptist Church), 500 S. Center Street	Ashland	c. 1858	Not Eligible; Contributes to Ashland Historic District

220

GIS # 7870-60-9649 & 7870-70-0585

DC2RVA: Not Eligible; Contributes to Ashland Historic District

Ashland Museum Comments: he former Ashland Baptist Church, built in 1859, was the first of the protestant congregations to break free of the shared building called the Free Church or Union Church. It was the only congregation to build before the Civil War. It was a Greek Revival, board and batten church with a large cupola (sold after the war to pay the preacher) and very tall, stately windows. Remarkably, that portion of the church remains largely untouched inside and out. The turn-of-the-century additions include a columned porch to make it look Colonial Revival, two side wings and a room between for offices, and a 1957 Sunday School addition in the rear that does not affect the original building. During the Civil War, it was a major hospital for wounded soldiers. We know this from diaries, the R.T James' Burial Book from the 1860s, and oral histories passed down the generations. For those reasons, *it should be considered potentially eligible under Criterion A and C.* In 1967, the congregation outgrew the church and sold the building to a non-profit group to run as an arts and community center. The Hanover Arts and Activities Center (The Center) has faithfully cared for the building since that time. The long lawn in front of the building and the oaks and maples gracing it are integral to the property. It is used as a community gathering place that holds hundreds of people for the Ashland Railroad Run in April, the annual 4th of July celebration, Ashland Train Day in November, Beer Festival in the fall, and Light Up The Tracks celebration in December. To help keep The Center financially viable, the lawn and the former sanctuary are used on weekends for weddings and reunions. This is the Center's primary source of funds to run its programs in theatre and art. It would be wrong to cut into that landscape and remove a community gathering space and also terminating The Center's ability to finance its programs.

166-5041	Priddy House, 107 Stebbins Street	Ashland	c. 1926	Potentially Eligible Under C

221

GIS # 7870-60-6458

DC2RVA: Potentially Eligible Under C

Ashland Museum Comments: Built in the 1920s by town Mayor Newton Priddy, this is an unusually fine example of Craftsman Bungalow. The brick is rumored to be "silo brick." *Should be potentially eligible by criterion C.*

166-5072	Randolph-Macon College Historic District Expansion	Ashland	early 20th c. - mid-20th c.	Potentially Eligible Under Criteria A and C

222

GIS # 7870-60-6458

DC2RVA: Potentially Eligible Under Criteria A and C; [Contributes to Ashland Historic District]

Ashland Historic District 2017 Survey Update Evaluation: The large brick structures at Randolph-Macon College including Thomas Branch Hall, Mary Branch Dormitory, and Peele Hall (not located in the Randolph-Macon College Complex; National Register of Historic Places) are good examples of the institutional interpretation of the Georgian Revival.

Ashland Museum Comments: Agree.

9

VIRGINIA DEQ (continued)

(For response to comments 201 through 235, refer to pages B-178 and B-179)

VIRGINIA DEQ (continued)

(For response to comments 201 through 235, refer to pages B-178 and B-179)

Ashland Museum Updates, Corrections, Additions and Comments to DC2RVA Table 6-1

DHR Number	Name	City/County	Date of Construction	DC2RVA Project Team Recommendation
166-5073	Berkleytown Historic District	Ashland	1900–1965	Potentially Eligible Under A

DC2RVA: Potentially Eligible Under A

166-5073-0010	House, Dabney Funeral Home, 600 B Street	Ashland	c. 1955	Potentially Eligible Under A; Contributes to Berkleytown Historic District

223

GIS # 7870-84-8796

DC2RVA: Potentially Eligible Under A; Contributes to Berkleytown Historic District

Ashland Museum Comments: In the 2018 expansion of the historic district this property will likely be included.

The Dabney family has a long history as funeral directors in the Ashland African-American community. F.E. Dabney founded this funeral home in the 1952 and after his death it passed on to his son F.E. Dabney Jr. As an example of the mid-century African American Funeral business, it should be considered potentially eligible under Criterion A.

166-5073-	Commercial Building, 612 Henry Street Coleman Hotel	Ashland	1938-39	Not recognized by DC2RVA

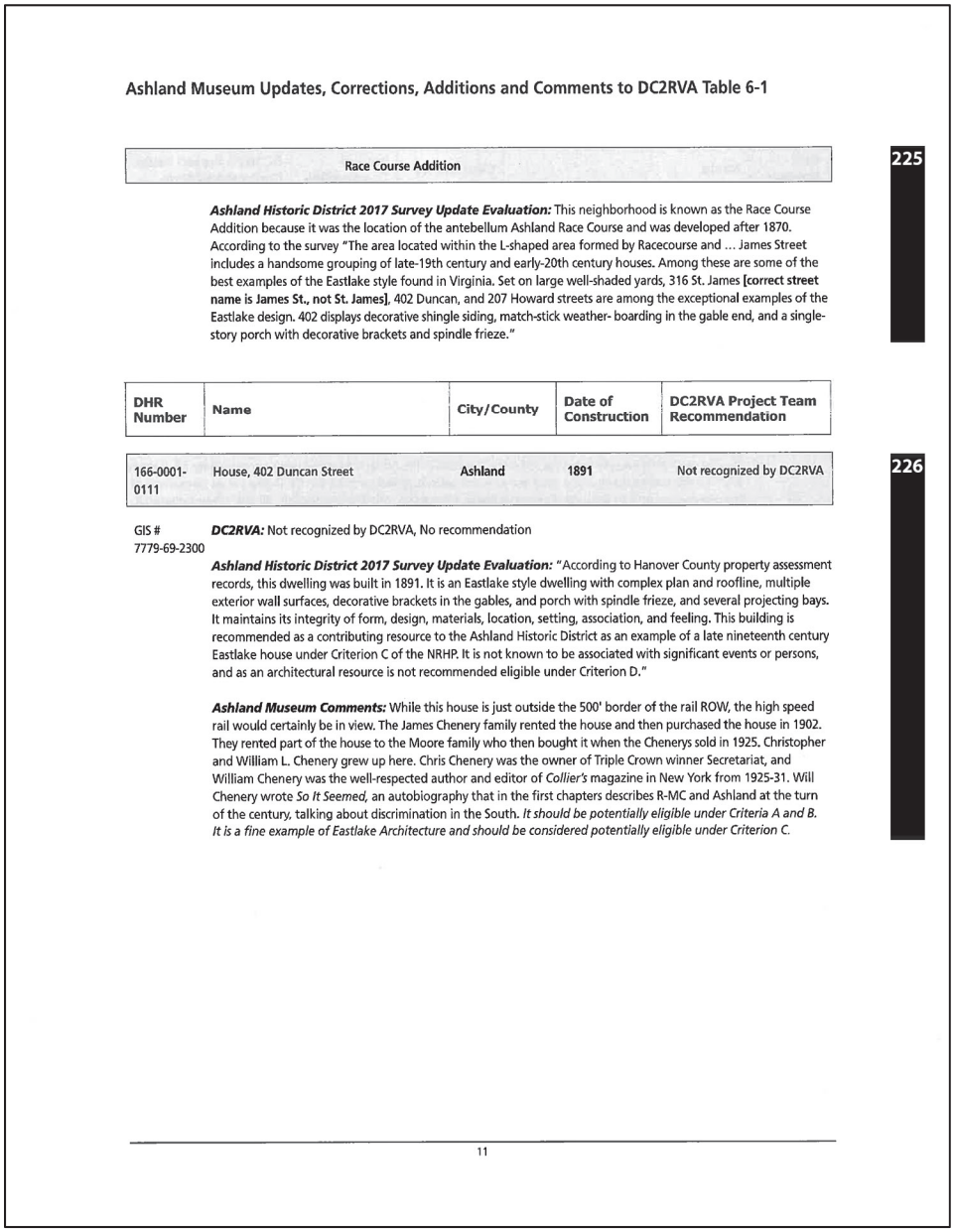
224

GIS # 7870-84-8796

DC2RVA: Not recognized by DC2RVA, No recommendation

Ashland Museum Comments: In 1925-26, African-Americans Mildred and John Coleman built Coleman's Hotel, the only hotel available for African American travelers to the Ashland area. They operated it until 1938 until they sold it to the trustees of the South Anna Lodge No 874 of Improved Benevolent Protective Order of Elks of the World. It still carries the name of Elks Lodge locally, but today it is an apartment building. We believe that it *should be considered potentially eligible under Criteria A and C.*

10



Ashland Museum Updates, Corrections, Additions and Comments to DC2RVA Table 6-1

Race Course Addition

225

Ashland Historic District 2017 Survey Update Evaluation: This neighborhood is known as the Race Course Addition because it was the location of the antebellum Ashland Race Course and was developed after 1870. According to the survey "The area located within the L-shaped area formed by Racecourse and … James Street includes a handsome grouping of late-19th century and early-20th century houses. Among these are some of the best examples of the Eastlake style found in Virginia. Set on large well-shaded yards, 316 St. James **[correct street name is James St., not St. James]**, 402 Duncan, and 207 Howard streets are among the exceptional examples of the Eastlake design. 402 displays decorative shingle siding, match-stick weather- boarding in the gable end, and a single-story porch with decorative brackets and spindle frieze."

DHR Number	Name	City/County	Date of Construction	DC2RVA Project Team Recommendation
166-0001-0111	House, 402 Duncan Street	Ashland	1891	Not recognized by DC2RVA

226

GIS # 7779-69-2300

DC2RVA: Not recognized by DC2RVA, No recommendation

Ashland Historic District 2017 Survey Update Evaluation: "According to Hanover County property assessment records, this dwelling was built in 1891. It is an Eastlake style dwelling with complex plan and roofline, multiple exterior wall surfaces, decorative brackets in the gables, and porch with spindle frieze, and several projecting bays. It maintains its integrity of form, design, materials, location, setting, association, and feeling. This building is recommended as a contributing resource to the Ashland Historic District as an example of a late nineteenth century Eastlake house under Criterion C of the NRHP. It is not known to be associated with significant events or persons, and as an architectural resource is not recommended eligible under Criterion D."

Ashland Museum Comments: While this house is just outside the 500' border of the rail ROW, the high speed rail would certainly be in view. The James Chenery family rented the house and then purchased the house in 1902. They rented part of the house to the Moore family who then bought it when the Chenerys sold in 1925. Christopher and William L. Chenery grew up here. Chris Chenery was the owner of Triple Crown winner Secretariat, and William Chenery was the well-respected author and editor of *Collier's* magazine in New York from 1925-31. Will Chenery wrote *So It Seemed,* an autobiography that in the first chapters describes R-MC and Ashland at the turn of the century, talking about discrimination in the South. *It should be potentially eligible under Criteria A and B. It is a fine example of Eastlake Architecture and should be considered potentially eligible under Criterion C.*

11

VIRGINIA DEQ (continued)

(For response to comments 201 through 235, refer to pages B-178 and B-179)

Ashland Museum Updates, Corrections, Additions and Comments to DC2RVA Table 6-1

DHR Number	Name	City/County	Date of Construction	DC2RVA Project Team Recommendation

Buildings in the Downtown Ashland Business District Missing from DC2RVA Table 6-1

166-0001-0239	Commercial Building, 205-209 England St Ashland Theatre	Ashland	1947	Not recognized by DC2RVA

GIS # 7870-71-9371

DC2RVA: Not recognized by DC2RVA, No recommendation

Ashland Museum Comments: Ashland Theatre was built by the D.H. Covington. In segregated Virginia, it was a white-only theatre until the 1970s. It remained an active theatre until the 1980s and then was used sporadically until it was donated to the Town of Ashland. A board of citizens are now joining with the Town to renovate it. In the 1982 nomination of the district, the Theatre was considered non-contributing because it thought to be built in the 1950s. With the 2017 Survey Update, it will be considered contributing. The Art Deco Ashland Theatre is an icon of Ashland, with the tall neon "Ashland" sign and the marquee. Therefore it might be considered contributing under A and C.

227

166-0001-0240	Commercial Building, 211 England Street U.S. Post Office	Ashland	1938-39	Not recognized by DC2RVA

GIS # 7870-81-0352

DC2RVA: Not recognized by DC2RVA, No recommendation

Ashland Museum Comments: In the original DHR 1982 Survey, this was assumed to be 1950s, but it was in fact built in 1938-39. So with the 2017 update, it will be considered contributing. It is an example of a WPA-era construction and design and should be also potentially eligible under Criteria A and C.

228

166-0001-0261	Commercial Building, 203 England Street Loving Ford	Ashland	1929	Not recognized by DC2RVA

GIS # 7870-71-8373

DC2RVA: Not recognized by DC2RVA, No recommendation

Ashland Museum Comments: The original portion of the Loving Ford Building was built between 1921 and 1929. In the 1982 nomination of the district, this building was considered non-contributing because they thought it was built in the 1950s. The Ford building should have been considered contributing then, but with the 2017 Survey Update, it will be considered contributing.

229

Table Notes: Cells highlighted in denote those recommended to remain listed, eligible, or potentially eligible for the NRHP, while those cells in blue denote resources recommended potentially eligible as part of the current survey.

Ashland Museum Notes: Cells highlighted in green are *additional* properties the Ashland Museum is recommending be listed, eligible or potentially eligible as part of the current DC2RVA survey.

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VIRGINIA DEQ (continued)

(For response to comments 201 through 235, refer to pages B-178 and B-179)

THE ASHLAND MUSEUM

Showcasing the rich historical and cultural heritage of our town of Ashland, Virginia

June 19, 2017

Kerri S. Barile, Ph.D.
President, Dovetail Cultural Resource Group
c/o Virginia Department of Rail and Public Transportation
801 E. Main Street, Suite 1000
Richmond, VA 23219

Re: Comments on Cultural Resource Identification – Level Reports
Southeastern High Speed Rail Tier II Environmental Impact Statement
Washington, DC to Richmond Segment

Dear Kerri:

The Ashland Museum is taking advantage of your extension until June 19 to make additional comments.

The attachment is a summary list of the parcels the Ashland Museum commented on without the detail included in the May 30 letter/email. At this time, we are recommending a few additional properties from your Indentified Resources list be considered as potentially eligible. The list does not include our comments, but those can be forwarded to you in a separate document if you would like.

Please contact us with any questions.

Sincerely,

Rosanne Groat Shalf

Betsy Hodges

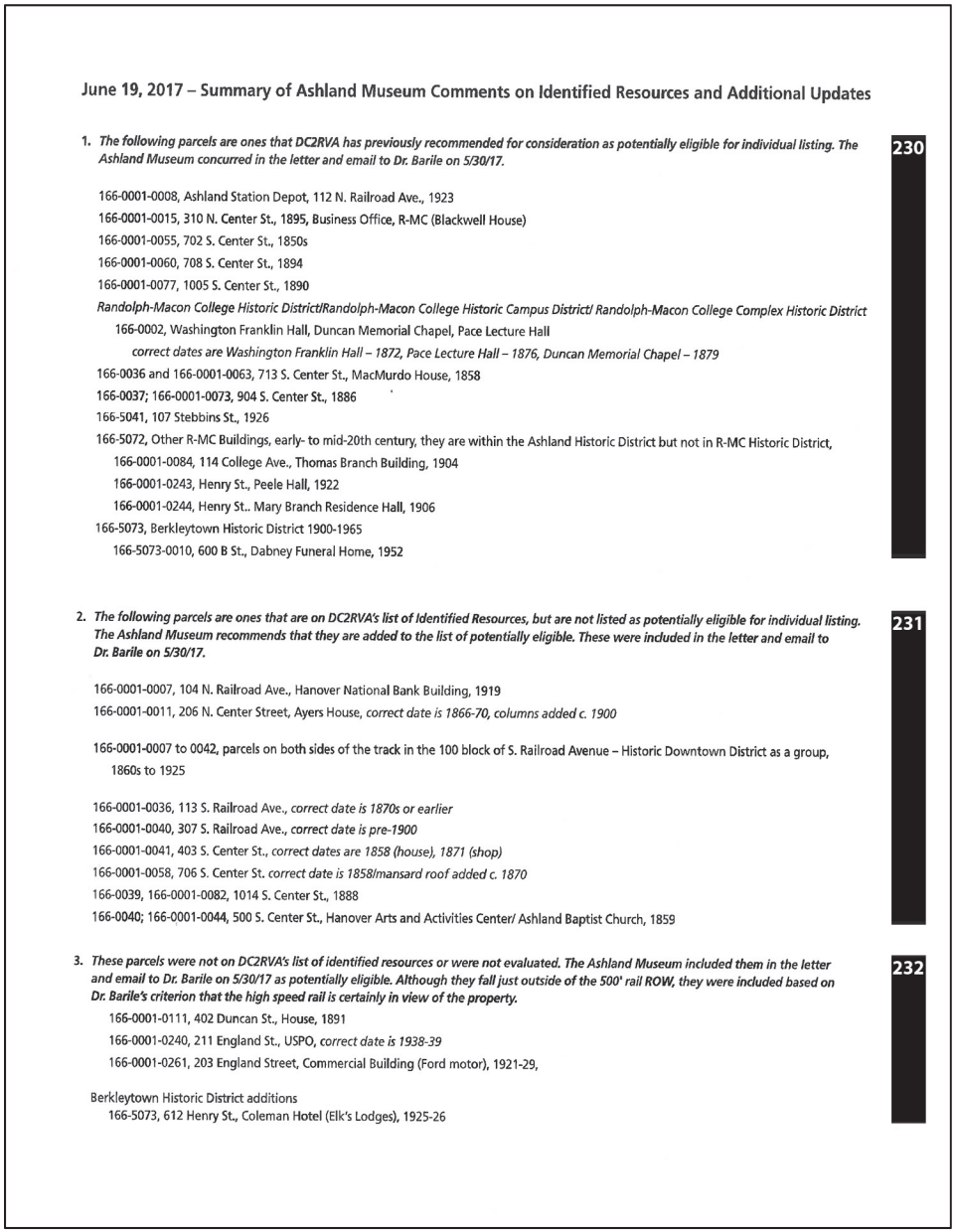
Attachment: June 19, 2017 – Summary of Ashland Museum Comments on Identified Resources and Additional Updates

cc: Garet Prior, Town of Asland
Nora Amos, Town of Ashland
Ellen Wulf, Ashland Museum
Alphine Jefferson, Hanover County Black Heritage Society
Paul Davies, Randolph-Macon College

Mailing Address: PO Box 633, Ashland, VA 23005 | Museum Location: 105 Hanover Ave., Ashland, VA 23005
804-368-7314 | ashlandmuseum@comcast.net | www.ashlandmuseum.org

VIRGINIA DEQ (continued)

(No comments on this page)



June 19, 2017 – Summary of Ashland Museum Comments on Identified Resources and Additional Updates

1. ***The following parcels are ones that DC2RVA has previously recommended for consideration as potentially eligible for individual listing. The Ashland Museum concurred in the letter and email to Dr. Barile on 5/30/17.*** **230**

166-0001-0008, Ashland Station Depot, 112 N. Railroad Ave., 1923
166-0001-0015, 310 N. Center St., 1895, Business Office, R-MC (Blackwell House)
166-0001-0055, 702 S. Center St., 1850s
166-0001-0060, 708 S. Center St., 1894
166-0001-0077, 1005 S. Center St., 1890
Randolph-Macon College Historic District/Randolph-Macon College Historic Campus District/ Randolph-Macon College Complex Historic District
166-0002, Washington Franklin Hall, Duncan Memorial Chapel, Pace Lecture Hall
correct dates are Washington Franklin Hall – 1872, Pace Lecture Hall – 1876, Duncan Memorial Chapel – 1879
166-0036 and 166-0001-0063, 713 S. Center St., MacMurdo House, 1858
166-0037; 166-0001-0073, 904 S. Center St., 1886
166-5041, 107 Stebbins St., 1926
166-5072, Other R-MC Buildings, early- to mid-20th century, they are within the Ashland Historic District but not in R-MC Historic District,
166-0001-0084, 114 College Ave., Thomas Branch Building, 1904
166-0001-0243, Henry St., Peele Hall, 1922
166-0001-0244, Henry St.. Mary Branch Residence Hall, 1906
166-5073, Berkleytown Historic District 1900-1965
166-5073-0010, 600 B St., Dabney Funeral Home, 1952

2. ***The following parcels are ones that are on DC2RVA's list of Identified Resources, but are not listed as potentially eligible for individual listing. The Ashland Museum recommends that they are added to the list of potentially eligible. These were included in the letter and email to Dr. Barile on 5/30/17.*** **231**

166-0001-0007, 104 N. Railroad Ave., Hanover National Bank Building, 1919
166-0001-0011, 206 N. Center Street, Ayers House, *correct date is 1866-70, columns added c. 1900*

166-0001-0007 to 0042, parcels on both sides of the track in the 100 block of S. Railroad Avenue – Historic Downtown District as a group, 1860s to 1925

166-0001-0036, 113 S. Railroad Ave., *correct date is 1870s or earlier*
166-0001-0040, 307 S. Railroad Ave., *correct date is pre-1900*
166-0001-0041, 403 S. Center St., *correct dates are 1858 (house), 1871 (shop)*
166-0001-0058, 706 S. Center St. *correct date is 1858/mansard roof added c. 1870*
166-0039, 166-0001-0082, 1014 S. Center St., 1888
166-0040; 166-0001-0044, 500 S. Center St., Hanover Arts and Activities Center/ Ashland Baptist Church, 1859

3. ***These parcels were not on DC2RVA's list of identified resources or were not evaluated. The Ashland Museum included them in the letter and email to Dr. Barile on 5/30/17 as potentially eligible. Although they fall just outside of the 500' rail ROW, they were included based on Dr. Barile's criterion that the high speed rail is certainly in view of the property.*** **232**

166-0001-0111, 402 Duncan St., House, 1891
166-0001-0240, 211 England St., USPO, *correct date is 1938-39*
166-0001-0261, 203 England Street, Commercial Building (Ford motor), 1921-29,

Berkleytown Historic District additions
166-5073, 612 Henry St., Coleman Hotel (Elk's Lodges), 1925-26

VIRGINIA DEQ (continued)

(For response to comments 201 through 235, refer to pages B-178 and B-179)

Page 2: June 19, 2017 – Summary of Ashland Museum Comments on Identified Resources and Additional Updates

4. ***The following parcels are on DC2RVA's list of Identified Resources and the Ashland Museum concurs with the recommendation as a contributing resource. These were listed in the letter and email to Dr. Barile on 5/30/17.*** 233

166-0001-0027, 105 S. Railroad Ave., *Correction: this DHR number is for 101 England St., built 1925, which is a part of the Historic Downtown.*
166-0001-0030, 107 S. Railroad Ave., Cross Brothers Grocery, *Correction: date is 1922,* and 166-0001-0033, 109 S. Railroad Ave. former A&P, added to Cross Brothers Grocery.
166-0001-0035, 111 S. Railroad Ave., (Hometown Realty) c. 1900
166-0001-0232, 103-109 England St., *Correction: date is 1925.*

5. ***The following parcel is on DC2RVA's list of Identified Resources and the Ashland Museum concurs with the recommendation, but corrections are noted. This was not listed in the letter and email to Dr. Barile on 5/30/17.*** 234

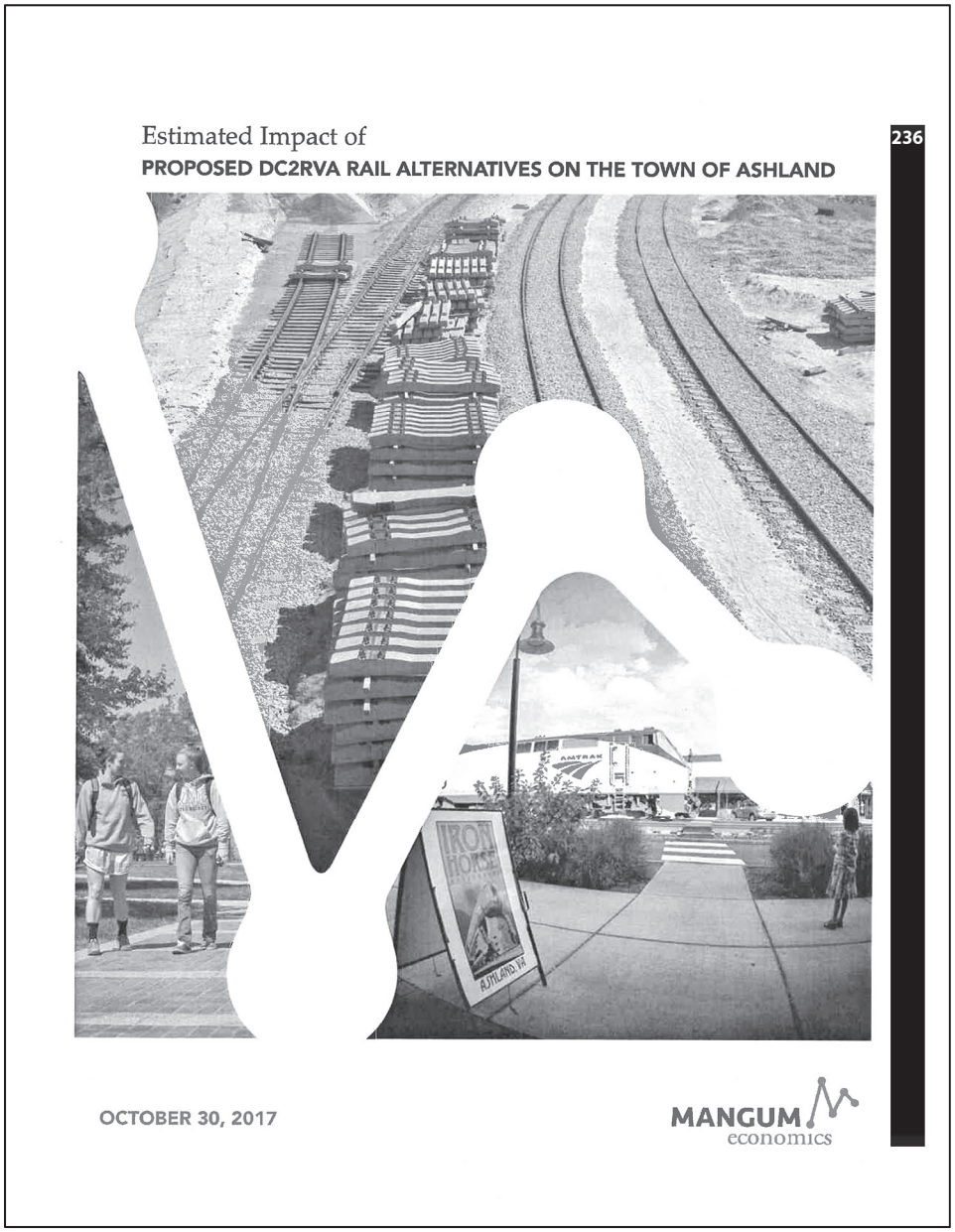
166-0001-0083, 1017 S. Center St., *Correction: date is 1888-1889.*

6. ***The following parcels are additional ones that were not on DC2RVA's list of potentially eligible and were not previously noted by the Museum, but ones that the Ashland Museum would like to add to those deemed potentially eligible.*** 235

166-0001-0013, 304 N. Center St., 1858 with 1925 renovation, Rhodeen, home of St. George Tucker, clerk of the Virginia Senate, Richard Bierne, editor of State newspaper, Mary Bierne prominent horticulturist.
166-0001-0017, 312 N. Center St., 1850s, owned by George Nolley, prominent Methodist minister, and son Olin, who was a builder/designer of many homes in Ashland, active around 1900-30
166-0001-0049, 600 S. Center St., 1850s with post Civil War Italianate details added, home of the Stebbins family
166-0001-0050, 601 S. Center St., 1850s, W. W. Bennett home and farm, R-MC President
166-0001-0051, 603 S. Center St., 1850s
166-0001-0052, 604 S. Center St., 1850s, Vernacular I-house
166-0001-0069, 804 S. Center St., 1870s, Vernacular I-house
166-0001-0070, 805 S. Center St., 1880s, Eastlake/ Stick Style
166-0001-0071, 807 S. Center St., Vernacular I-house, 1870
166-0001-0072, 901 S. Center St., 1910s, Queen Anne, recently renovated,
166-0001-0074, 905 S. Center St., Colonial Revival, c. 1900
166-0001-0081, 1013 S. Center St., Colonial Revival, c. 1900
166-0001-0110, 400 Duncan St., Architect-designed Craftsman home
166-0001-0186, 203 Race Course St., Transitional Queen Anne/Colonial Revival, c. 1900
166-0001-0211, 203 Virginia St., 1850s, Vernacular antebellum
166-0001-0213, 300 Virginia St., 1850s, Vernacular antebellum, 1870s Italianate decoration added
166-0001-0214, 301 Virginia St., 1850s, Vernacular antebellum, 1870s Italianate decoration added
166-0001-0215, 302 Virginia St., 1850s, Vernacular antebellum, 1870s Italianate decoration added
166-0001-0216, 303 Virginia St., 1850s, Vernacular antebellum
166-0001-0218, 401 Virginia St., 1870-80s, Ashland Presbyterian Church
No DHR #, 1009 S. Center St., 1910-20, "Telcourt" built by Luck Family on England Street east of Rt 1, moved to this location in 2010
Berkleytown Historic District additions
166-5073-, Franklin Jackson home, 1880s
166-5073-, corner of Berkley and Henry Streets, John M. Gandy School, 1948, mid-century modern, good example of the Prairie School Style or Chicago School Style influenced by Frank LIoyd Wright and the Bauhaus Movement.

VIRGINIA DEQ (continued)

(For response to comments 201 through 235, refer to pages B-178 and B-179)



VIRGINIA DEQ (continued)

236. DRPT acknowledges that the Town of Ashland commissioned an economic report and has included the report in its formal comments.

NEPA requires FRA to evaluate the physical impacts of construction of no-build and build alternatives. Relocation of businesses is the primary adverse economic effect of a build alternative. Build Alternative 5A, the Preferred Alternative for Area 5, has one business relocation on Ashcake Road due to the grade separation of Ashcake Road and the CSXT tracks for safety and traffic mobility purposes. There are adequate replacement properties available for relocation purposes in the area.

The economic report commissioned by the Town of Ashland focused on "two general categories [of construction alternatives] that are likely to have a significantly disruptive impact": "the proposals that add a third above-ground track" and "constructing the three-track trench" (Mangum, p.15). Alternative 5A, the Preferred Alternative for Area 5, does not fall into either of these categories and was not formally assessed in the report. Nevertheless, the "Disruptive Impact of Construction" is addressed in Section 4.11.1 of the Draft EIS and Section 5.11.1 of the Final EIS and comes to a similar conclusion as the report.

The construction management plan (to be developed once final design is complete and construction is to commence) will include provisions to maintain access during construction to all businesses/buildings not being relocated.

VIRGINIA DEQ (continued)

Report prepared by

MANGUM
economics

Dr. Mangum earned his Ph.D. in economics at George Mason University in 1995. He has more than two decades of experience in quantitative analysis and policy development at the federal and state level.

Mangum Economic Consulting, LLC is a Richmond, Virginia based firm that specializes in producing objective economic, quantitative, and qualitative analysis in support of strategic decision making. Examples of typical studies include:

Policy Analysis
Identify the intended and, more importantly, unintended consequences of proposed legislation and other policy initiatives.

Economic Impact Assessments and Return on Investment Analyses
Measure the economic contribution that business, education, or other enterprises make to their localities.

Workforce Information
Project the demand for, and supply of, qualified workers.

Cluster Analysis
Use occupation and industry clusters to illuminate regional workforce and industry strengths and identify connections between the two.

Environmental Scanning
Assess the economic, demographic, and other factors likely to affect your enterprise in the future.

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VIRGINIA DEQ (continued)

MANGUM
economics

Executive Summary

This report assesses the potential economic and fiscal impact on the Town of Ashland from proposed construction alternatives associated with Alternative Area 5, the ten-mile portion of the 123-mile DC2RVA High-Speed Rail Project that encompasses the Town of Ashland. The principal findings from that assessment are as follows:

1. The DC2RVA High-Speed Rail Project:
   - The purpose of DC2RVA is to increase rail capacity along the Washington, D.C. to Richmond corridor in order to provide reliable, frequent, and high-speed passenger service, and also to better accommodate freight rail movement through the corridor, including freight going to and from Virginia's ports.
   - In addition to proposed improvements to stations, parking, signals, and other safety systems, the primary infrastructure improvement associated with the DC2RVA High-Speed Rail Project would be to add an additional main track to the existing two main tracks within this corridor.
2. Proposed construction alternatives for the Ashland portion of the DC2RVA corridor:
   - In September of this year, Federal Rail Administration (FRA) and the Virginia Department of Rail and Public Transportation (DRPT) proposed five general construction alternatives for the Ashland portion of the DC2RVA High-Speed Rail Project. Those alternatives were: 1) maintain two tracks through Ashland (the 3:2:3 option), 2) add one track east of the existing two tracks running through Ashland, 3) construct three tracks running through Ashland that would be centered within the existing right of way, 4) construct a three-track trench running through Ashland, and 5) add a two-track western bypass.:
     - Maintain two tracks through Ashland (the 3:2:3 option).
     - Add one track east of the existing two tracks running through Ashland.
     - Construct three tracks running through Ashland that would be centered within the existing right of way.
     - Construct a three-track trench running through Ashland.
     - Add a two-track western bypass>
   - Subsequent to the release of the FRA and DRPT proposed construction alternatives:
     - The Hanover County Board of Supervisors passed a resolution endorsing the 3-2-3 construction alternative.
     - The Ashland Town Council passed a resolution endorsing the western bypass.

DC TO RICHMOND SOUTHEAST HIGH SPEED RAIL

VIRGINIA DEQ (continued)

MANGUM economics

3. Our analysis:

- Focused on the two general categories of these proposed alternatives that are likely to have a significantly disruptive impact on the Town of Ashland's economy during their construction phase – proposals for an above-ground third-track through downtown Ashland (which are generally assumed to entail a two-year construction period), and the three-track trench through downtown Ashland (which is generally assumed to entail a three-year construction period).
- Used stakeholder focus group input, the results of an informal telephone survey of businesses along the existing railroad right of way on Center Street and Railroad Avenue, and a review of the existing empirical literature on the impact of transportation construction projects on adjacent businesses, to construct a *High Impact* and a *Low Impact* scenario around two general categories of these proposed alternatives.
- Determined that according to the assumptions of the *High Impact* scenario:
  - Construction-related business closures and reduced sales among businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road would generate an annual loss of approximately 133 full-time-equivalent jobs, $4.2 million in local labor income, and $10.9 million in local economic output within the Ashland/Hanover community.
  - Those losses would persist for at least two years under the above-ground third-track construction options, and at least three years under the three-track trench construction option, and then gradually abate over an unspecified period of time.
  - The cumulative construction-related direct loss of tax revenue during the two-year construction period for the above-ground third-track construction options would likely be at least ($345,134) for the Town of Ashland, and ($179,296) for Hanover County. While, the cumulative construction-related direct loss of tax revenue during three-year construction period for the proposed three-track trench would likely be at least ($517,702) for the Town of Ashland, and ($268,944) for Hanover County.

VIRGINIA DEQ (continued)

MANGUM economics

- Determined that according to the assumptions of the *Low Impact* scenario:
  - Construction-related business closures and reduced sales among businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road would generate an annual loss of approximately 77 full-time-equivalent jobs, $3.0 million in local labor income, and $7.9 million in local economic output within the Ashland/Hanover community.
  - Those losses would persist for at least two years under the above-ground third-track construction options, and at least three years under the three-track trench construction option, and then gradually abate over an unspecified period of time.
  - The cumulative construction-related direct loss of tax revenue during the two-year construction period for the above-ground third-track construction options would likely be at least ($140,891) for the Town of Ashland, and ($80,526) for Hanover County. While, the cumulative construction-related direct loss of tax revenue during three-year construction period for the proposed three-track trench would likely be at least ($211,337) for the Town of Ashland, and ($120,790) for Hanover County.
- Also demonstrated that the construction of an above-ground third track or the three-track trench through the center of Ashland would likely have negative impacts that, although difficult to quantify, are nonetheless important to qualify. Chief among those is the potential negative impact that the proposed construction alternatives could have on:
  - The 2,575 jobs, $51.1 million in payroll, and $13.8 million in state and local tax revenue that the Ashland/Hanover community derives from tourism.
  - The 447 faculty and staff jobs and $22.7 million in direct spending that Randolph-Macon College contributes to the Ashland/Hanover community.
  - The attractiveness to tourists, shoppers, and residents that the Town of Ashland derives from its small-town quality of life and reputation as a "train town."

Estimates provided in this report are based on the best information available and all reasonable care has been taken in assessing that information. However, because these estimates attempt to foresee circumstances that have not yet occurred, it is not possible to provide any assurance that they will be representative of actual events. These estimates are intended to provide a general indication of likely future outcomes and should not be construed to represent a precise measure of those outcomes.

VIRGINIA DEQ (continued)

MANGUM economics

Introduction

This report quantifies the potential economic and fiscal impact on the Town of Ashland from proposed construction alternatives associated with Alternative Area 5, the ten-mile portion of the 123-mile DC2RVA High-Speed Rail Project that encompasses the Town of Ashland. The remainder of the report is divided into five sections. *The DC2RVA High-Speed Rail Project* section provides a brief summary of the DC2RVA project and the evolution of the process that generated the currently proposed construction alternatives. The *Background Information* section provides a context for the economic and fiscal impact assessment to follow by providing general background on the Town of Ashland and the economy of the . The *Economic and Fiscal Impact* section provides an estimate of the potential economic and fiscal impact on the Town of Ashland associated with existing proposed Alternative Area 5 construction alternatives. While the *Other Impacts* section identifies and addresses some of the other potential consequences associated with those proposed construction alternatives. Finally, the *Conclusion* section provides a brief summary of our findings and concluding comments.

The DC2RVA High-Speed Rail Project

General Description

The DC2RVA High-Speed Rail Project involves service and infrastructure improvements to an existing 123-mile rail corridor owned by CSX Transportation that links Union Station in Washington D.C. to Centralia in Chesterfield County just south of Richmond. The purpose of the project is to increase rail capacity along the Washington, D.C. to Richmond corridor in order to provide reliable, frequent, and high-speed passenger service, and also to better accommodate freight rail movement through the corridor, including freight going to and from Virginia's ports. The need for these improvements is being driven primarily by population growth along the eastern seaboard, which is causing significant and ever-worsening congestion in the I-95 interstate highway corridor, and that is increasing the demand for efficient and reliable passenger rail service and freight rail service within the DC2RVA rail corridor.

In addition to proposed improvements to stations, parking, signals, and other safety systems, the primary infrastructure improvement associated with the DC2RVA High-Speed Rail Project would be to add an additional main track, either to the left or right, of the existing two main tracks within this corridor. According to the Federal Rail Administration (FRA) and the Virginia Department of Rail and Public Transportation (DRPT), it is anticipated that the proposed improvements to the DC2RVA corridor would be completed by 2025 and enhanced passenger and rail service could be made available at that

VIRGINIA DEQ (continued)

MANGUM economics

time. It is further anticipated that, that enhanced rail service would include nine additional Amtrak daily round-trip passenger trains within the DC2RVA corridor.

Proposed Construction Alternatives for Ashland

After a lengthy review and public engagement process that began in 2014, in September of this year, FRA and DRPT issued their "Tier II Draft Environmental Impact Statement Section 4(f) Evaluation" report. That report proposed five general construction alternatives for Alternative Area 5, the ten-mile portion of the DC2RVA High-Speed Rail Project that encompasses the Town of Ashland. Those alternatives were:

1) Maintain two tracks through Ashland: This is sometimes called the 3:2:3 option. It would involve constructing a third track north and south of the Town of Ashland but maintaining the existing two tracks through town. This option would mean that all tracks through town remain within their existing right of way. There were two variants of this option. One left the Town of Ashland's existing train station at its current location and one required relocating it to Ashcake Road.

2) Add one track east of the existing two tracks running through Ashland: This option would involve adding an additional track through the Town of Ashland to the east of the existing two tracks. This option would require the acquisition of additional right of way and could potentially impact 42 parcels, although impacts would generally be limited to frontage, sidewalks, and driveways. This option would also necessitate closing a portion or Railroad Avenue and Center Street. There were two variants of this option. One left the Town of Ashland's existing train station at its current location and one required relocating it to Ashcake Road. It is anticipated that this option would involve a two-year period of construction in downtown Ashland.

3) Construct three tracks running through Ashland that would be centered within the existing right of way: This option would involve adding an additional track through the Town of Ashland but centering all three tracks on the existing right of way. This option would require the acquisition of additional right of way and could potentially impact 76 parcels, although impacts would generally be limited to frontage, sidewalks, and driveways. This option would also necessitate closing a portion of Railroad Avenue and Center Street. In addition, this option would require relocating the Town of Ashland's existing train station to Ashcake Road. It is anticipated that this option would involve a two-year period of construction in downtown Ashland.

4) Construct a three-track trench running through Ashland: This option would the involve construction of a trench, 11,000 feet long, 50 feet wide, and 33 feet deep, between Vaughan Road and Ashcake Road to accommodate three tracks through the Town of Ashland. This

VIRGINIA DEQ (continued)

MANGUM economics

option would require the acquisition of additional right of way and could potentially impact 76 parcels downtown (although impacts would generally be limited to frontage, sidewalks, and driveways), and 56 parcels adjacent to planned overpasses at Vaughan Road and Ashcake Road. This option would also necessitate the temporary closing of a portion Center Street. In addition, this option would require relocating the Town of Ashland's existing train station to Ashcake Road. As part of the construction, trench covers could be used to create new green space in downtown Ashland over the trench. It is anticipated that this option would involve a three-year period of construction in downtown Ashland.

5) Add a two-track western bypass: This option would involve constructing a two-track bypass to the west of the Town of Ashland in Hanover County. This option would require the acquisition of additional right of way in Hanover County and could potentially impact between 71 and 81 parcels. This option would not require the acquisition of additional right of way within the Town of Ashland.

FRA and DRPT Recommendations

Based on its analysis, FRA and DRPT concluded in their "Tier II Draft Environmental Impact Statement Section 4(f) Evaluation" report that: 1) the existing right of way through Ashland is limited and any alternative that adds a third track through the town will necessitate the acquisition of additional right of way, and 2) additional stakeholder input would benefit the agency's recommendation. Based on those conclusions, DRPT opted to defer its recommendation of a preferred construction alternative for Alternative Area 5, the ten-mile portion of the DC2RVA High-Speed Rail Project that encompasses the Town of Ashland, pending additional study of rail capacity improvements through the area. It is important to note that Alternative Area 5 was the only area along the 123-mile DC2RVA corridor for which DRPT chose not to recommend a preferred construction alternative.

Community Resolutions

In response to the intensity of public concern expressed regarding the DC2RVA construction alternatives proposed for the Ashland portion of the corridor, FRA and DRPT established a Community Advisory Committee (CAC). The CAC was comprised of representatives from the Town of Ashland, CSX Transportation, Hanover County, Randolph-Macon College, and the Richmond Regional Transportation Planning Organization. The CAC was charged with reviewing all proposed construction alternatives and providing advice to DRPT to help inform its final recommendation of a preferred construction alternative. The CAC held five monthly meetings between May and September of this year.

VIRGINIA DEQ (continued)

MANGUM economics

Although the CAC was unable to establish consensus on a single preferred construction alternative, at its final meeting on September 11 it presented its recommendation for the three "least objectionable" options. Those three were:

1) The 3-2-3 option to maintain two tracks through the Town of Ashland.
2) The two-track western bypass option.
3) The three-track trench running through the Town of Ashland.

Subsequent to the September 11 CAC meeting, the Hanover County Board of Supervisors passed a resolution on October 16 endorsing the 3-2-3 construction alternative. In presenting that endorsement, the Board cited several reasons for its decision. Among those were:

1) The severe impact that the western bypass option would have on the 81 parcels and 21 homes it would affect.
2) The severe impact that adding a third above-ground track would have on the Town of Ashland and its businesses.
3) The impact that the three-track trench would have on the Town of Ashland and its businesses because of the long three-year construction period required.
4) The FRA's previously announced intention to adopt an incremental approach to rail enhancements along the corridor in which improvements would be added on an as-needed basis.

Then, on October 20 the Ashland Town Council passed a resolution endorsing the two-track western bypass construction alternative and opposing the relocation of the current Ashland train station. In presenting that resolution, the Council also cited several reasons in support of its decision. Among those were:

1) The addition of a third above-ground track would severely impact the economic vitality and historic character of the Town of Ashland; restrict access to Randolph-Macon College and damage the safety, character, and usability of its campus; and restrict the flow of traffic moving east-west within the Town of Ashland.
2) The three-track trench would severely impact the economic vitality and historic character of the Town of Ashland and had not been adequately studied.
3) The 3-2-3 option to maintain two tracks through the Town of Ashland would merely delay a final resolution of the issue as it would not adequately address projected future capacity needs; and had been rejected by CSX Transportation, the owners of the tracks.

VIRGINIA DEQ (continued)

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Background Information

In this section, we provide a context for the economic and fiscal impact analyses to follow by providing some general background on the Town of Ashland and the Ashland/Hanover economy.

General Description

The Town of Ashland is a historic and picturesque locality with a population of around 7,200 residents. It was initially developed by the railroad as a mineral springs resort in the late 1840s. In 1868, Randolph-Macon College relocated to the Town of Ashland and that move eventually transitioned the character of Ashland into what it is today – a small college town where Randolph-Macon College not only provides a cultural locus for the Ashland community but is also the town's primary economic driver.

Recent Economic Trends

In this portion of the section, we set the stage for the economic and fiscal impact analyses to follow by providing background information on the Ashland/Hanover community's key economic characteristics. In reviewing these data, it is important to keep in mind that employment and wage data reported for Hanover County are inclusive of the Town of Ashland.[1]

Total Employment

Figure 1 provides data on the trend in total employment in Hanover County over the five-year period from the first quarter of 2012 through the first quarter of 2017. As these data demonstrate, employment growth in the county increased steadily over the period. Overall, between 1st quarter of 2012 and the 1st quarter of 2017 Hanover County experienced an increase of 5,723 jobs, or a 13.1 percent increase in total employment. To put that figure in perspective, over the same period the state of Virginia as a whole experienced a 6.0 percent increase in total employment.

[1] Because the Town of Ashland is not an independent city, its employment and wage data are not reported individually by the Virginia Employment Commission. Instead, they are included in data reported for Hanover County.

VIRGINIA DEQ (continued)

MANGUM economics

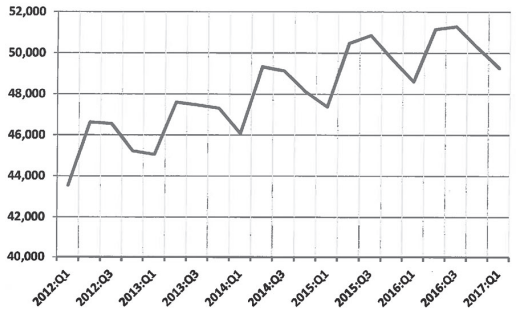

Figure 1: Hanover County Total Employment – 1st Quarter of 2012 through 1st Quarter of 2017[2]

To provide a point of reference, and to control for seasonality, Figure 2 compares Hanover County's year-over-year change in total employment over this same five-year period to comparable data for the state of Virginia as a whole. Any observation above the zero line in this graph denotes a year-over-year increase in employment, while any observation below the zero line denotes a year-over-year decline in employment. As these data indicate, up until 2016 year-over-year changes in employment in Hanover County generally exceeded the statewide average and typically by a substantial margin. However, in 2016 that changed as employment growth within the county collapsed back to the statewide trend. Moreover, in both cases, employment growth decelerated steadily throughout 2016. As of the first quarter of 2017, the year-over-year change in total employment was 1.4 percent in both Hanover County and the state of Virginia as a whole.

[2] *Data Source*: Virginia Employment Commission.

VIRGINIA DEQ (continued)

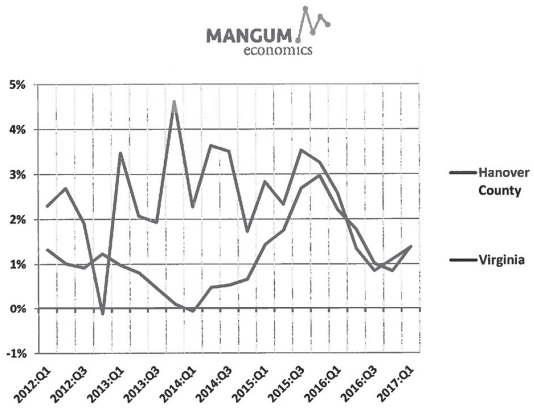

Figure 2: Year-Over-Year Change in Employment – 1st Quarter of 2012 through 1st Quarter of 2017[3]

Employment and Wages by Major Industry Sector

Figures 3 and 4 provide additional information on the factors underlying the employment trends displayed in Figures 1 and 2, by providing data on employment and wages by major industry sector in Hanover County in 2016. As these data show, the largest employment sector in the county that year was *Retail Trade* with 7,188 jobs (18th in wages at $585 per week), followed by *Health Care and Social Assistance* with 6,368 jobs (9th in wages at $927 per week), *Wholesale Trade* with 5,212 jobs (5th in wages at $1,110 per week), *Construction* with 5,209 jobs (8th in wages at $954 per week), and *Accommodation and Food Services* with 3,855 jobs (19th in wages at $292 per week). To place these figures in perspective, the average wage across all industry sectors in Hanover County in 2016 was $799 per week.

[3]*Data Source*: Virginia Employment Commission.

VIRGINIA DEQ (continued)

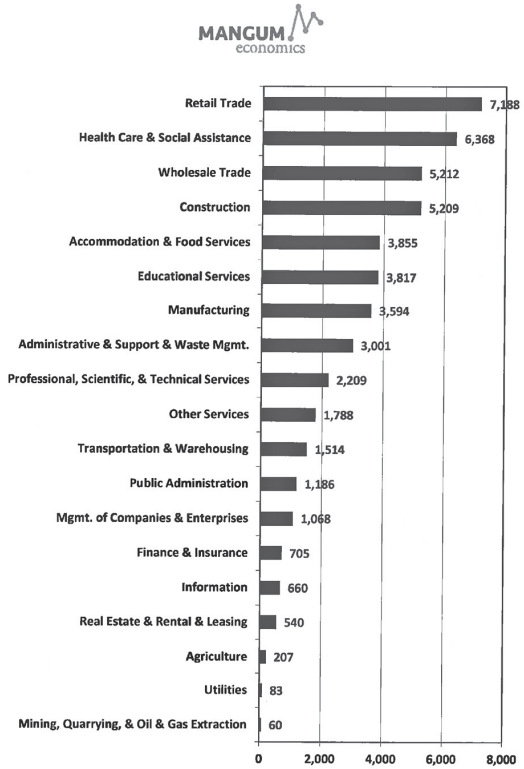

Figure 3: Employment by Major Industry Category in Hanover County in 2016[4]

[4]*Data Source*: Virginia Employment Commission.

VIRGINIA DEQ (continued)

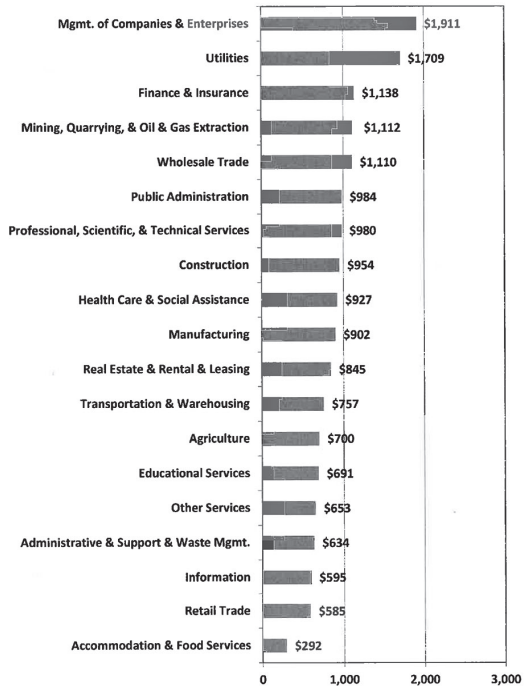

Figure 4: Average Weekly Wages Major Industry Category in Hanover County in 2016[5]

[5]*Data Source*: Virginia Employment Commission.

VIRGINIA DEQ (continued)

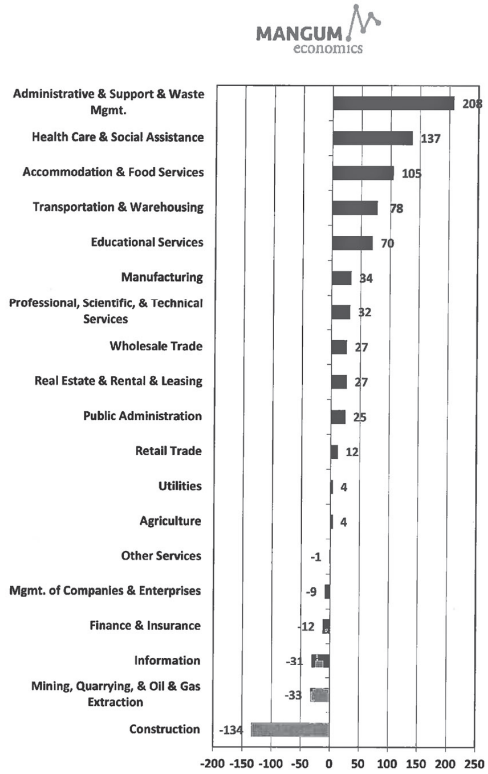

Figure 5: Change in Employment by Major Industry Category in Hanover County between 2015 and 2016[6]

[6]*Data Source*: Virginia Employment Commission.

VIRGINIA DEQ (continued)

MANGUM economics

Figure 5 depicts the change in employment in Hanover County by major industry sector between 2015 and 2016. As these data indicate, the largest employment gains in the county over this period occurred in the *Administrative and Support and Waste Management Services* (up 208 jobs), *Health Care and Social Assistance* (up 137 jobs), and *Accommodation and Food Services* (up 105 jobs) sectors. At the other end of the spectrum, the largest employment losses in Hanover County occurred in the *Construction* (down 134 jobs), *Mining* (down 33 jobs), and *Information* (down 31 jobs) sectors.

Unemployment

Figure 6 provides information on unemployment trends in Hanover County over the five-year period from August 2012 to August 2017 and benchmarks those data against the statewide norm. As these data show, throughout this period unemployment rates in the county tracked relatively closely with the statewide average. However, Hanover County's unemployment rate was typically about one half a percentage point below the statewide average. As of August 2017, unemployment stood at 3.4 percent in Hanover County and 3.8 percent statewide in Virginia.

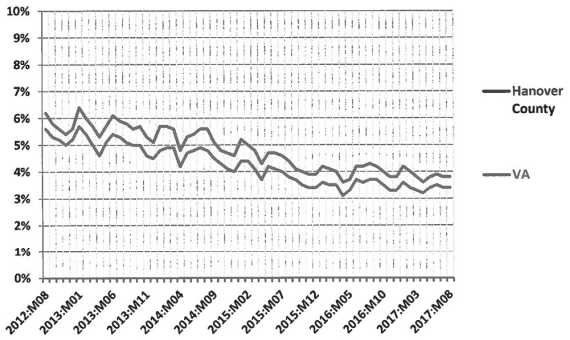

Figure 6: Unemployment Rate – August 2012 to August 2017[7]

[7] *Data Source:* Virginia Employment Commission.

VIRGINIA DEQ (continued)

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Fiscal Trends

Because it is not possible to obtain employment and wage data for the Town of Ashland specifically, in this portion of the section we look at a different measure of local economic activity. That measure is local revenue derived from business activity. These data are available from the Virginia Auditor of Public Accounts for towns as well as counties and that allows us to better isolate recent economic trends in the Town of Ashland relative to trends in Hanover County.

Figure 7 depicts the year-over-year change in *Other Local Taxes* revenue in the Town of Ashland over the five-year period from 2012 through 2016 and benchmarks those data against comparable data for Hanover County, as well as the statewide average across all Virginia towns and all Virginia counties. *Other Local Taxes* is primarily comprised of revenue from the local Sales and Use Tax, Business License (BPOL) Tax, Hotel and Motel Room Tax, and Restaurant Meals Tax. As these data show, the overall trend for the Town of Ashland over this period has been one of growing revenue collections, with the year-over-year change in *Other Local Taxes* revenue rising from 2.7 percent in 2012 to 8.7 percent in 2016. It is significant to note, however, that much of that increase is attributable to a significant spike in 2016 when overall collections of *Other Local Taxes* increased by $373,825 relative to 2015.

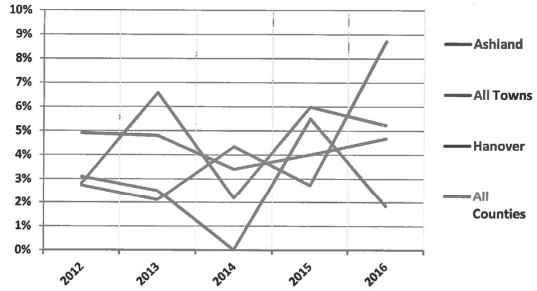

Figure 7: Year-Over-Year Change in Other Local Tax Revenue – 2008 through 2016[8]

[8] *Data Source:* Virginia Auditor of Public Accounts.

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Figures 8 through 10 provide a drill-down of the data in Figure 7 for three key revenue streams that are directly related to changes in business activity: the Business License or BPOL Tax, which is a tax on a business' gross receipts; the Hotel and Motel Room Tax, which is a tax on hotel and motel room rentals; and the Restaurant Meals Tax, which is a local tax on restaurant meals in addition to the local sales tax.

As the data depicted in Figure 8 indicate, the overall trend for the Town of Ashland over this period with respect to Business License (BPOL) Tax revenue was again one of growth, with the year-over-year change in revenue from this tax rising from 0.2 percent in 2012 to 22.8 percent in 2016. Here again, however, it bears notice that much of that increase is attributable to a spike in 2016 when overall collections of Business License Tax revenue increased by $106,063 relative to 2015. Moreover, that increase accounted for 28 percent of the Town of Ashland's spike in revenue from *Other Local Taxes* that year.

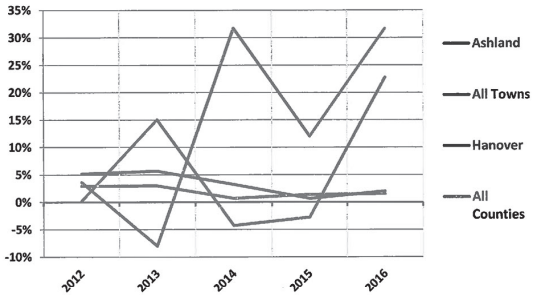

Figure 8: Year-Over-Year Change in Business License Tax Revenue – 2008 through 2016[9]

[9] *Data Source*: Virginia Auditor of Public Accounts.

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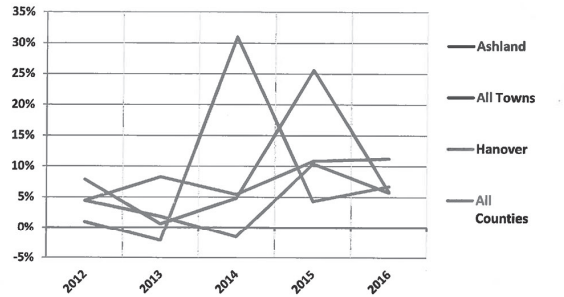

Figure 9: Year-Over-Year Change in Hotel and Motel Room Tax Revenue – 2008 through 2016[10]

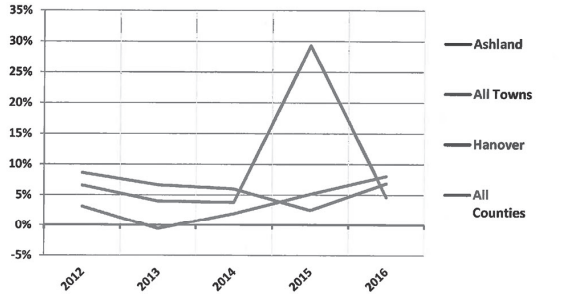

Figure 10: Year-Over-Year Change in Restaurant Meals Tax Revenue – 2008 through 2016[11]

[10] *Data Source*: Virginia Auditor of Public Accounts.
[11] *Data Source*: Virginia Auditor of Public Accounts.

VIRGINIA DEQ (continued)

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As indicated in Figure 9, the overall trend with respect to Hotel and Motel Room Tax revenue in the Town of Ashland over this period was more varied. However, over the period as a whole Ashland's year-over-year change in revenue from this tax rose from 0.9 percent in 2012 to 6.7 percent in 2016. Focusing again on 2016, it should be noted that overall collections of Hotel and Motel Room Tax revenue increased by $41,012 that year relative to 2015, and that increase accounted for 11 percent of the Town of Ashland's spike in revenue from *Other Local Taxes* that year.

Finally, as shown in Figure 10, the overall trend for the Town of Ashland with respect to Restaurant Meals Tax revenue over this period was also one of growth, with the year-over-year change in revenue from this tax rising from 3.1 percent in 2012 to 8.1 percent in 2016 (please note that Hanover County does not impose a Restaurant Meals Tax). However, again, much of that increase occurred in 2016 when revenue from the town's Restaurant Meals Tax increased by $157,150 relative to 2015, and that increase accounted for 42 percent of the Town of Ashland's spike in revenue from *Other Local Taxes* that year.

In Sum

Over the last five years, the economy of the Ashland/Hanover community has out-performed the statewide average. Between the first quarter of 2012 and the first quarter of 2017, total employment in Hanover County area grew by 13.1 percent in contrast to a 6.0 percent average growth rate statewide. However, since 2016 year-over-year employment growth in Hanover County has collapsed back to the statewide trend, and in both cases that trend is one of decelerating growth. Although, our attempt to better isolate recent economic trends in the Town of Ashland from those in Hanover County by using data on business-related local revenue collections from the Virginia Auditor of Public Accounts, indicates that the Town of Ashland may have recently diverged from that trend and is experiencing a significant acceleration in business-related economic activity.

Economic and Fiscal Impact

Of the proposed construction alternatives for Alternative Area 5, the ten-mile portion of the DC2RVA High-Speed Rail Project that encompasses the Town of Ashland, there are two general categories that are likely to have a significantly disruptive impact on the Town of Ashland's economy during their construction phase, and potentially beyond. Those two categories are the proposals that add a third above-ground track to the two existing tracks running through the center of Ashland (which are generally assumed to entail a two-year construction period), and constructing the three-track trench

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VIRGINIA DEQ (continued)

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through the center of Ashland (which is generally assumed to entail a three-year construction period). In this section, we estimate the likely economic and fiscal impact associated with those two general construction alternatives.

Disruptive Impact of Construction

The first step in our analysis involved ascertaining what the likely impact of construction would be on economic activity within the Town of Ashland. To accomplish that task, we employed three approaches. The first entailed convening a focus group of interested stakeholders. The second entailed a telephone survey of businesses along the existing rail line on Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road. While the third involved a general review of the published literature on the impact of transportation construction generally, and rail construction specifically, on adjacent businesses.

Focus Group

With the assistance of Town Manager Joshua Farrar and other staff, on Monday, September 18, we convened a focus group of about forty interested stakeholders to obtain input on their perception of the likely impact on their businesses of constructing a third above-ground track or the three-track trench. Some of the key themes that emerged from that conversation were:

1) The construction period for either alternative would be long – two years for the above-ground options and three years for the trench. Many businesses would not survive that long a period of severe economic disruption.
2) The proposed options would negatively impact property values, the ability of current owners to sell or lease their property and could put some property owners "underwater" on their mortgages, where the balance of their mortgage would be higher than the fair market value of their property.
3) The prolonged disruption of economic activity would make it harder for businesses to secure working capital and that would limit future investment and expansion.
4) Businesses along Center Street and Railroad Avenue are inter-dependent and function something like a mall. Customer traffic for one business frequently spills over into customer traffic for other businesses. Restricting the flow of customers across the tracks and between businesses will eliminate those positive spillover effects.
5) Many of the businesses along Center Street and Railroad Avenue are dependent on the Town of Ashland's general small-town ambiance and reputation as a "train town." There were concerns

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VIRGINIA DEQ (continued)

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expressed that the proposed construction options would permanently destroy that character. One speaker specifically mentioned the proposed three-track trench option and stated that because the trains would no longer be visible, "all that would be left of the trains would be the fumes."

6) Concerns regarding the short-run, construction-driven, impact on tourism, and the potential long-run impact on tourism from relocating the existing train station and fundamentally altering the character of the town.

7) The potential negative impact on Randolph-Macon College, the Town of Ashland's primary economic engine.

Business Survey

To obtain more detailed information on the perceptions of affected businesses of the likely impact of constructing a third above-ground track or the three-track trench on their establishments, Town of Ashland staff also conducted an informal telephone survey of 19 businesses along the existing rail line on Center Street and Railroad Avenue. The businesses surveyed included restaurants, other food service establishments, retailers, lodging establishments, and professional services. Out of the 16 responses received:

1) Thirteen respondents indicated that they anticipated having to close or relocate their business.

2) Two respondents indicated that they anticipated a 50 percent loss of business.

3) One respondent indicated that they anticipated a 75 percent loss of business.

Literature Review

We reviewed the available literature on the impact of transportation construction on adjacent businesses. We identified a peer-reviewed analysis on the Los Angeles Metro Rail Red Line and an analysis of the Central Corridor light rail transit project in Minneapolis-St. Paul that was conducted by the Federal Transit Administration and the Minneapolis-St. Paul Metropolitan Council. The peer-reviewed analysis for the Los Angeles Metro Rail Red Line is especially important because its results are based on data verified by Dun & Bradstreet rather than only survey responses.

VIRGINIA DEQ (continued)

MANGUM economics

Los Angeles Metro Rail Red Line[12]

In July 2017, the *Journal of Transport and Land Use* published an analysis of the business-related impacts from construction of the Los Angeles Metro Rail Red Line. This analysis relied on actual establishment data from the National Establishment Time-Series database. The purpose of the analysis was to estimate the impact that construction of the Metro Rail Red Line from downtown Los Angeles to the San Fernando Valley had on the probability of businesses closures. The analysis found that businesses within 400 meters of construction were 46 percent more likely to fail during the construction period than those more than 400 meters away.

Central Corridor

In December of 2012, the Federal Transit Administration and the Minneapolis-St. Paul Metropolitan Council published the "Central Corridor Light Rail Transit Project Supplemental Draft Environmental Impact Statement for Construction-Related Potential Impacts on Business Revenues."[13] The Central Corridor Light Rail Transit Project involved construction of an eleven-mile, two-track, above-ground, light-rail line from downtown Minneapolis to downtown St. Paul. Based on survey data from a subset of 96 affected businesses that applied for loans from a mitigation program, the study found that affected businesses experienced a loss of between 2 percent and 84 percent of revenue during the construction phase of the project, with an average loss of 30 percent across all businesses within the sample.

Appendix D of the Federal Transit Administration report contains a review of several peer-reviewed, government, or academically published studies.[14] The following is a summary of those studies based on the Federal Transit Administration descriptions:

1) "Analyzing the Effects of Highway Rehabilitation on Businesses," De Solminihac and Harrison (1993):
   - Based on a survey of businesses along an 11.6-mile highway reconstruction project along the Southwest Freeway in Houston, Texas.
   - Found that negative impacts from construction were most severely felt by businesses in four retail categories: food stores (37 percent drop in sales), automotive sales (32

[12] Rosalie Ray, "Open for Business? Effects of Los Angeles metro Rail construction on adjacent businesses," *Journal of Transport and Land Use*, vol.10, no.1 (2017) pp.725-742.
[13] "Central Corridor Light Rail Transit Project Supplemental Draft Environmental Impact Statement for Construction-Related Potential Impacts on Business Revenues," Federal Transit Administration and Metropolitan Council, December 2012.
[14] "Appendix D: Literature review for the Central Corridor Supplemental EIS," Federal Transit Administration and Metropolitan Council, December 2012.

VIRGINIA DEQ (continued)

MANGUM economics

percent drop in sales), general merchandise (28 percent drop in sales), and home furnishings (17 percent drop in sales).
- Twelve percent of businesses surveyed reported experiencing a drop in sales of 40 percent or more during construction.

2) "Estimated Construction Period Impact of Widening State Highway 21 in Caldwell, Texas," Wildenthal and Buffington (1996):
   - Based on a survey of businesses along a 2.3-mile highway widening project along the Highway 21 in Caldwell, Texas.
   - Sixty-three percent of respondents reported a decline in sales during construction, and 37 percent reported a decline of 25 percent or more in sales during construction.
3) "Mitigating the Adverse Impacts of the Dallas North Central Expressway Construction on Businesses," Harrison and Waldman (1998):
   - Based on analysis of business-related construction impacts associated with an 18-mile highway reconstruction project on the North Central Expressway and the associated construction of adjacent Dallas Area Rapid Transit light rail line in Dallas, Texas.
   - Found no significant drop in business sales during construction.
   - Found a 10 percent drop in tenant occupancy rates during construction.
4) Highway Construction Impacts on Wyoming Business," Young, Wolfington, and Tomasini (2005):
   - Based on surveys of businesses along twelve highway construction projects in Wyoming.
   - Found that affected businesses generally experienced reduced growth rates rather than negative growth rates during construction.
   - However, found that food-related retail, gas stations, and hotels were particularly susceptible to negative sales impacts during construction.
5) "Development of Improved Procedures for Business Accommodation on Transportation Projects," Ellis and Washburn (2005):
   - Based on surveys of businesses along four highway reconstruction corridors in Florida.
   - Businesses reported issues with customers accessing their location, utility outages, and traffic congestion.
   - Found that fast-food retailers were more likely to report negative impacts on sales than destination businesses such as banks, specialty retailers, and insurance companies.
6) "Report on Mitigation of Transportation Construction Impacts," Minnesota department of Transportation (2009):
   - Based on surveys of businesses along seven transportation construction projects in Minnesota.
   - Sixty-two percent of respondents reported lost sales due to construction.

VIRGINIA DEQ (continued)

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7) "Assessing Neighborhood and Social Influences of Transit Corridors," Fan and Guthrie (2012):
   - Based on surveys of businesses along two existing and two planned light rail line corridors in Minneapolis-St. Paul.
   - Forty percent of respondents along the Central Corridor Light Rail Transit corridor reported that construction had had and would continue to have somewhat negative or strongly negative impacts on their business.

In Sum

Ashland businesses located immediately along the existing rail line on Center Street and Railroad Avenue – those that would be most heavily impacted by construction of a third above-ground track through downtown Ashland, or the three-tack trench – report very dire expectations of what that construction would do to their businesses. Over 80 percent of respondents to an informal telephone survey indicated that they would likely be forced to close their business as a result of construction and the remaining 20 percent indicated that they expected sales losses of between 50 and 75 percent.

The available empirical literature on the effect of transportation-related construction on adjacent businesses is very limited and available studies exhibit a wide range of findings. However, based on those findings it appears that a minimum expectation of construction-related sales losses would be approximately 30 percent for surviving businesses and that businesses along the affected route would be approximately 46 percent more likely to fail during the construction period than businesses located further away.

There are also reasons to believe that the results from the literature review do indeed represent a minimum expectation and that the economic impact of the proposed above-ground and trench options for constructing a third track through the Town of Ashland could be larger and more lasting than those results indicate. Most of the localities involved in the studies reviewed were large metropolitan areas (*e.g.*, Dallas, Los Angeles, and Minneapolis-St. Paul). In a larger metropolitan area, economic activity can be more easily temporarily displaced as business customers have a larger number of local alternatives and may not need to dramatically alter their geographic purchasing patterns. Similarly, the options for avoiding traffic congestion are more numerous because of the larger number of streets and transit alternatives. In short, a larger metropolitan area provides room for more easily accommodating the economic disruption caused by the construction of transportation projects.

In a small town, however, such options are much more limited and that is likely to be particularly true of a small town that would be effectively cut in half by the proposed construction project. In this regard, anecdotal evidence from the effect of highway construction on the small town of Salado Texas

VIRGINIA DEQ (continued)

MANGUM economics

may be illustrative. According to a news report published in the *Texas Monthly* in December 2015, ongoing construction related to the expansion of I-35 had a major impact on the town, with 82 of the town's 127 businesses closing during the construction period. According to the article,

> *For major cities along I-35, the interstate's expansion means minor, temporary pain and future reward. But for the smaller towns in between, the pain is more acutely felt. When the construction crews come to town, it's a little like hosting an occupying army. Freedom of movement is restricted.*[15]

For these reasons, it is quite possible that the loss of economic activity suffered by affected businesses in the Town of Ashland would be larger, longer lasting, and more broadly dispersed than the available empirical literature would otherwise indicate.

Scenarios

Based on our analysis of the likely impact of construction on economic activity within the Town of Ashland, we have identified three scenarios for the economic and fiscal impact analysis. The first scenario is a baseline analysis and estimates the current economic and fiscal impact of existing businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road. The second scenario is a high-impact scenario that is based largely on input received through the focus group and telephone survey of affected businesses. The third scenario is a low impact scenario that is based largely on the results of our literature review.

[15] Christopher Hooks, "The Road Work Goes on Forever," *Texas Monthly*, December 2015.

VIRGINIA DEQ (continued)

MANGUM economics

Economic Impact

In this portion of the section, we provide estimates of the economic impact associated with the Baseline scenario, and the construction-related economic losses associated with the High Impact and Low Impact scenarios, discussed above.

Method

To assess the likely impact of adding a third above-ground track to the two existing tracks running through the center of Ashland, or constructing the three-track trench through the center of Ashland, we employ a commonly used regional economic impact model called IMPLAN.[16] The IMPLAN model uses regional and national economic data to construct traditional Keynesian multipliers and uses those multipliers to quantify economic impact.

Keynesian multipliers are named after the British economist John Maynard Keynes. They measure the ripple effects that an expenditure has as it makes its way through the economy. For example, as when a restaurant purchases goods and services or pays its workers, thereby generating income for someone else, which is in turn spent, thereby becoming income for yet someone else, and so on, and so on. Through this process, one dollar in expenditures generates multiple dollars of income. The mathematical relationship between the initial expenditure and the total income generated is the Keynesian multiplier.

In the analysis that follows, for each of the identified scenarios we present estimates for three categories of economic impact. First-round direct impact measures the direct economic contribution that businesses make to the local economy (*e.g.*, own employment, wages paid, and goods and services purchased). Second-round indirect and induced impact measures the economic ripple effects of that first round direct impact in terms of business to business, and household (employee) to business, transactions. Total impact is simply the sum of the preceding two. These categories of impact are then further defined in terms of employment (the jobs that are created), labor income (the wages and benefits associated with those jobs), economic output (the total amount of economic activity that is created in the economy), and fiscal impact (the state and local, federal, and total tax revenues that are generated by this economic activity).

[16] IMPLAN is produced by Minnesota IMPLAN Group, Inc.

VIRGINIA DEQ (continued)

Baseline Scenario

In conducting our analysis of the current economic impact on the Ashland/Hanover community from businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road, we employ the following assumption:

- Businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road currently generate $15.7 million in annual gross receipts.[17]

By feeding this information into the IMPLAN model, we obtain the estimates of annual economic impact shown in Table 1. As these data indicate, we estimate that businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road currently generate the following annual economic activity within the :

- Total local employment impact of approximately 256 full-time-equivalent jobs.
- Total local labor income impact of approximately $10.1 million.
- Total local output impact of approximately $27.6 million.

Table 1: Estimated Current Annual Economic Impact of existing Businesses along Center Street and Railroad Avenue on the Ashland/Hanover Community

Economic Impact:			
	Employment	Labor Income	Output
First Round Direct Economic Activity	170	$5,841,009	$15,732,617
Second Round Indirect and Induced Economic Activity	87	$4,245,039	$11,837,884
*Total, Direct, Indirect, and Induced Economic Activity**	**256**	**$10,086,048**	**$27,570,501**

**May not sum due to rounding.*

[17] *Data Source*: Town of Ashland.

VIRGINIA DEQ (continued)

High Impact Scenario

For the *High Impact Scenario,* we base our estimate of the likely annual loss in economic activity on the Ashland/Hanover community from construction-related closures and sales losses for businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road on the following assumptions:

- Businesses located in the affected areas currently generate $15.7 million in annual gross receipts.[18]
- Due to construction-related business closures and reduced sales, restaurants, other food service, retailers, and lodging establishments would experience a combined 75 percent reduction in gross receipts during the construction period.
- Due to construction-related business closures and reduced sales, professional services establishments would experience a combined 30 percent reduction in gross receipts during the construction period.

By feeding this information into the IMPLAN model, we obtain the estimates of annual negative economic impact shown in Table 2. As these data indicate, we estimate that construction-related business closures and reduced sales among businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road would generate the following annual losses in economic activity within the Ashland/Hanover community under the *High Impact Scenario*:

- Total reduction in local employment of approximately 133 full-time-equivalent jobs.
- Total reduction in local labor income of approximately $4.2 million.
- Total reduction in local output impact of approximately $10.9 million.

[18] *Data Source*: Town of Ashland.

VIRGINIA DEQ (continued)

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Table 2: Estimated Annual Negative Economic Impact on the Ashland/Hanover Community from Construction-Related Business Closures and Reduced Sales among Existing Businesses along Center Street and Railroad Avenue – High Impact Scenario

Economic Impact:			
	Employment	Labor Income	Output
First Round Direct Economic Activity	(100)	($2,695,663)	($6,510,984)
Second Round Indirect and Induced Economic Activity	(33)	($1,546,995)	($4,400,614)
*Total, Direct, Indirect, and Induced Economic Activity**	**(133)**	**($4,242,658)**	**($10,911,598)**

**May not sum due to rounding.*

It is anticipated that these losses would persist for at least two years under the above-ground third-track construction options, and at least three years under the three-track trench construction option, and then gradually abate over an unspecified period of time.

Low Impact Scenario

For the *Low Impact Scenario,* we base our estimate of the likely annual loss in economic activity on the Ashland/Hanover community from construction-related closures and sales losses for businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road on the following assumptions:

- Businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road currently generate $15.7 million in annual gross receipts.[19]
- Due to construction-related business closures and reduced sales, restaurants, other food service, retailers, lodging, and professional services establishments would experience a combined 30 percent reduction in gross receipts during the construction period.

By feeding this information into the IMPLAN model, we obtain the estimates of annual negative economic impact shown in Table 3. As these data indicate, we estimate that construction-related business closures and reduced sales among businesses located along Center Street and Railroad

[19] *Data Source*: Town of Ashland.

VIRGINIA DEQ (continued)

MANGUM economics

Avenue and between Vaughan Road and Ashcake Road would generate the following annual losses in economic activity within the Ashland/Hanover community under the *Low Impact Scenario*:

- Total reduction in local employment of approximately 77 full-time-equivalent jobs.
- Total reduction in local labor income of approximately $3.0 million.
- Total reduction in local output of approximately $7.9 million.

Table 3: Estimated Annual Negative Economic Impact on the Ashland/Hanover Community from Construction-Related Business Closures and Reduced Sales among Existing Businesses along Center Street and Railroad Avenue – Low Impact Scenario

Economic Impact:			
	Employment	Labor Income	Output
First Round Direct Economic Activity	(51)	($1,752,302)	($4,341,671)
Second Round Indirect and Induced Economic Activity	(26)	($1,273,512)	($3,551,364)
*Total, Direct, Indirect, and Induced Economic Activity**	**(77)**	**($3,025,814)**	**($7,893,035)**

**May not sum due to rounding.*

It is anticipated that these losses would persist for at least two years under the above-ground third-track construction options, and at least three years under the three-track trench construction option, and then gradually abate over an unspecified period of time.

Fiscal Impact

In this portion of the section, we provide estimates of the direct fiscal impact, and the direct construction-related fiscal losses, associated with the Baseline, High Impact, and Low Impact scenarios detailed earlier. It is important to note, however, that these estimates pertain only to the direct fiscal contribution made by existing businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road, and the direct fiscal losses that would be attributable to construction-related business closures and reduced sales among these businesses. These estimates of fiscal impact do not capture the positive or negative consequences associated with the second round indirect and induced economic activity estimated in the *Economic Impact* portion of this section.

VIRGINIA DEQ (continued)

Baseline Scenario

As shown in table 4, based on data provided by the Town of Ashland we estimate that businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road currently generate a total $241,572 in tax revenue annually for the Town of Ashland and $281,011 in tax revenue annually for Hanover County.

Table 4: Current Direct Annual Fiscal Impact from Existing Businesses along Center Street and Railroad Avenue

Sector	Annual Gross Receipts[20]	Total Annual Ashland Tax Revenue[21]	Total Annual Hanover County Tax Revenue[22]
Restaurant	$4,160,881	$198,197	$66,334
Retail	$1,743,263	$2,454	$27,935
Lodging	$176,929	$14,862	$11,258
Professional Services	$9,651,544	$9,277	$30,247
Residential		$16,782	$145,237
Total	**$15,732,617**	**$241,572**	**$281,011**

[20] *Data Source*: Town of Ashland
[21] *Data Source*: Town of Ashland. These data include tax revenue from Business License Tax (BPOL), Hotel and Motel Room Tax, Restaurant Meals tax, and Real Estate Tax.
[22] *Data Source*: Town of Ashland and local sales and use tax revenue computations by Mangum Economics. These data include tax revenue from Local Sales and Use Tax and Real Estate Tax.

VIRGINIA DEQ (continued)

High Impact Scenario

In conducting our analysis of the likely loss of tax revenue associated with construction-related closures and sales losses among businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road under the *High Impact Scenario*, we employ the following assumptions:

- Due to construction-related business closures and reduced sales, restaurants, other food service, retailers, and lodging establishments would experience a combined 75 percent reduction in gross receipts during the construction period.
- Due to construction-related business closures and reduced sales, professional services establishments would experience a combined 30 percent reduction in gross receipts during the construction period.
- The market value of commercial and residential properties located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road would be reduced by 20 percent due to construction-related activity.

As shown in table 5, based on these assumptions we estimate that the annual construction-related loss of direct tax revenue from businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road associated with the *High Impact Scenario* would be approximately ($172,567) for the Town of Ashland and approximately ($89,648) for Hanover County.

Assuming a two-year period of construction for the proposed above-ground third-track construction options, these figures imply a minimum cumulative tax revenue loss of approximately ($345,134) for the Town of Ashland, and approximately ($179,296) for Hanover County. Assuming a three-year period of construction for the proposed three-track trench, these figures imply a minimum cumulative tax revenue loss of approximately ($517,702) for the Town of Ashland, and approximately ($268,944) for Hanover County. Although, it is important to note that the actual cumulative loss of tax revenue would likely be higher than these estimates due the fact that the construction-related losses in economic activity would likely extend beyond the construction period and gradually abate over an unspecified period of time, and that these estimates do not take into account losses from a reduction in second round indirect and induced economic activity.

VIRGINIA DEQ (continued)

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Table 5: Estimated Negative Fiscal Impact from Construction-Related Business Closures and Reduced Sales among Existing Businesses along Center Street and Railroad Avenue – High Impact Scenario

Sector	Annual Gross Receipts[23]	Total Annual Ashland Tax Revenue[24]	Total Annual Hanover County Tax Revenue[25]
Restaurant	($3,120,661)	($155,666)	($36,152)
Retail	($1,307,447)	($1,162)	($15,175)
Lodging	($132,697)	($9,852)	($3,225)
Professional Services	($2,895,463)	($2,531)	($6,049)
Residential		($3,356)	($29,047)
Total Annual Loss	**($7,456,268)**	**($172,567)**	**($89,648)**
Minimum Cumulative Loss over 2 Year Above-Ground Third-Track Construction	**($14,912,536)**	**($345,134)**	**($179,296)**
Minimum Cumulative Loss over 3 Year Three-Track Trench Construction	**($22,368,804)**	**($517,702)**	**($268,944)**

[23] *Data Source*: Town of Ashland
[24] *Data Source*: Town of Ashland. These data include tax revenue from Business License Tax (BPOL), Hotel and Motel Room Tax, Restaurant Meals tax, and Real Estate Tax.
[25] *Data Source*: Town of Ashland and local sales and use tax revenue computations by Mangum Economics. These data include tax revenue from Local Sales and Use Tax and Real Estate Tax.

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VIRGINIA DEQ (continued)

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Low Impact Scenario

In conducting our analysis of the likely loss of tax revenue associated with construction-related closures and sales losses among businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road under the *Low Impact Scenario*, we employ the following assumptions:

- Due to construction-related business closures and reduced sales, restaurants, other food service, retailers, lodging, and professional services establishments would experience a combined 30 percent reduction in gross receipts during the construction period.
- The market value of commercial and residential properties located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road would be reduced by 10 percent due to construction-related activity.

As shown in table 6, based on these assumptions we estimate that the annual construction-related loss of direct tax revenue from businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road associated with the *Low Impact Scenario* would be approximately ($70,446) for the Town of Ashland and approximately ($40,263) for Hanover County.

Assuming a two-year period of construction for the proposed above-ground third-track construction options, these figures imply a minimum cumulative tax revenue loss of approximately ($140,891) for the Town of Ashland, and approximately ($80,526) for Hanover County. Assuming a three-year period of construction for the proposed three-track trench, these figures imply a minimum cumulative tax revenue loss of approximately ($211,337) for the Town of Ashland, and approximately ($120,790) for Hanover County. Although, it is again important to note that the actual cumulative loss of tax revenue would likely be higher than these estimates due the fact that the construction-related losses in economic activity would likely extend beyond the construction period and gradually abate over an unspecified period of time, and that these estimates do not take into account losses from a reduction in second round indirect and induced economic activity.

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VIRGINIA DEQ (continued)

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Table 6: **Estimated Negative Fiscal Impact from Construction-Related Business Closures and Reduced Sales among Existing Businesses along Center Street and Railroad Avenue – Low Impact Scenario**

Sector	Annual Gross Receipts[26]	Total Annual Ashland Tax Revenue[27]	Total Annual Hanover County Tax Revenue[28]
Restaurant	($1,248,264)	($62,011)	($14,955)
Retail	($522,979)	($489)	($6,280)
Lodging	($53,079)	($3,988)	($1,480)
Professional Services	($2,895,463)	($2,279)	($3,025)
Residential		($1,678)	($14,524)
Total Annual Loss	**($4,719,785)**	**($70,446)**	**($40,263)**
Minimum Cumulative Loss over 2 Year Above-Ground, Third-Track Construction	**($9,439,570)**	**($140,891)**	**($80,526)**
Minimum Cumulative Loss over 3 Year Three-Track Trench Construction	**($14,159,355)**	**($211,337)**	**($120,790)**

[26] *Data Source*: Town of Ashland
[27] *Data Source*: Town of Ashland. These data include tax revenue from Business License Tax (BPOL), Hotel and Motel Room Tax, Restaurant Meals tax, and Real Estate Tax.
[28] *Data Source*: Town of Ashland and local sales and use tax revenue computations by Mangum Economics. These data include tax revenue from Local Sales and Use Tax and Real Estate Tax.

VIRGINIA DEQ (continued)

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Other Impacts

In this section, we identify potential economic consequences associated with the construction of an above-ground third track or a three-track trench through the center of Ashland, that are important to take into account, although they are difficult to quantify.

Tourism

One of the issues that emerged from our September 18 focus group with stakeholders was a concern about the impact that the proposed construction alternatives would have on tourism. That concern is not without merit. Tourism is a big business in Virginia and in the Ashland/Hanover community. According to data from the Virginia Tourism Corporation, in 2016 tourism generated $26.7 billion in overall expenditures in Virginia, and those expenditures were responsible for supporting 229,259 jobs, $5.6 billion in payroll, and $1.7 billion in state and local tax revenue.[29]

Closer to home, the Virginia Tourism Corporation data also indicate that in 2016 tourism generated $228.2 million in overall expenditures in the Ashland/Hanover community, and those expenditures were responsible for supporting 2,575 jobs, $51.1 million in payroll, and $13.8 million in state and local tax revenue.[30] Moreover, as shown in Figure 11, between 2015 and 2016 the Ashland/Hanover community experienced greater growth in tourism-related impact in expenditures, employment, payroll, state tax revenue, and local tax revenue than the state of Virginia as a whole. Finally, with respect to the Town of Ashland specifically, data provided by Randolph-Macon College indicate that the college attracts over 100,000 visitors to the Ashland/Hanover community each year.[31] While data from the Ashland/Hanover Visitors Center indicate that in 2016 the Center had 18,081 visitors and that the largest proportion of those annual visitors (5,131) came in November, the same month as the annual Ashland Train Day festival.[32]

Given the nature of the proposed construction alternatives and their direct, lengthy, and likely lingering impact on the Ashland/Hanover Community, it is reasonable to expect that they will negatively impact these numbers, even though it is not possible to quantify the precise magnitude of that effect.

[29] "The Economic Impact of Domestic Travel on Virginia Counties 2016," Virginia Tourism Corporation, September 2017.
[30] "The Economic Impact of Domestic Travel on Virginia Counties 2016," Virginia Tourism Corporation, September 2017.
[31] *Data Source*: Randolph-Macon College.
[32] *Data Source*: "2016 Ashland/Hanover Visitors Center Report," Ashland/Hanover Visitors Center.

VIRGINIA DEQ (continued)

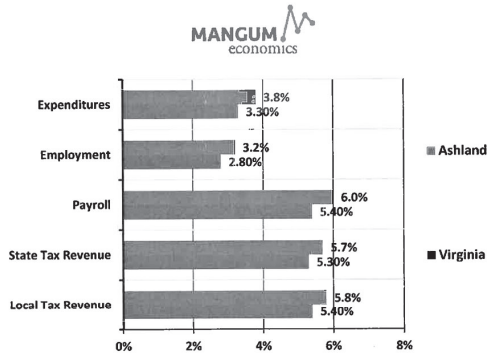

Figure 11: Year-Over-Year Change in Tourism Impact between 2015 and 2016[33]

Randolph-Macon College

Another issue that emerged from our September 18 focus group with stakeholders was a concern about the impact that the proposed construction alternatives would have on Randolph-Macon College. Randolph-Macon College is the primary driver of the Town of Ashland's economy. In the 2014-2015 academic year, Randolph-Macon College had a fall headcount enrollment of 1,394 students, employed 447 faculty and staff, and was directly responsible for contributing $22.7 million in spending to the Ashland/Hanover community.[34] In addition, in recent years the college has undertaken an ambitious capital expansion program that has resulted in $67.5 million in current and ongoing construction on campus. The most recent milestone in that expansion is the new 30,000 square foot science building that had its groundbreaking ceremony in May of 2016.

Because the current railroad right of way cuts right through the middle of Randolph-Macon College's campus, it is certain that either the construction of an above-ground third-track or the three-track trench would significantly disrupt the college's activities, and potentially impact its ability to attract students and continue to grow, expand, and invest. Moreover, that disruption would only further add to the list of significant challenges currently faced by Virginia's private, non-profit, four-year colleges and universities.

[33] "The Economic Impact of Domestic Travel on Virginia Counties 2016," Virginia Tourism Corporation, September 2017.
[34] *Data Source*: State Council of Higher Education for Virginia and Randolph-Macon College.

VIRGINIA DEQ (continued)

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economics

About three-quarters of Randolph-Macon College's students are Virginia residents. According to recent data from the Weldon Cooper Center, the number of college-age (20-24) individuals in Virginia is projected to decline by 4.3% between 2016 and 2020.[35] That decline will shrink the available pool of potential new students for Randolph-Macon College and other private and public Virginia colleges and universities. Moreover, it will likely place smaller private, non-profit, institutions such as Randolph-Macon College at a disadvantage, as they are forced to compete against larger, and heavily subsidized, public colleges and universities for a declining pool of potential new students.

Figure 12 depicts the year-over-year change in fall headcount enrollment in Virginia's public, four-year colleges and universities; private, non-profit, four-year colleges and universities; and Randolph-Macon College over the ten-year period from 2008 through 2016. As these data indicate, consistent with the demographic trends cited above, enrollment growth in Virginia's private, non-profit, four-year colleges and universities has generally been decelerating since 2009 and drifted into negative territory in 2015 and 2016.

To date, however, Randolph-Macon College has been able to out-perform that general trend. In 2016, Randolph-Macon College posted a 2.0 percent year-over-year increase in fall headcount enrollment, as compared to a 2.2 percent decline in enrollment across all Virginia private, non-profit, four-year colleges and universities, and a 0.6 percent increase in enrollment in the state's public, four-year colleges and universities. However, because of the significant, direct, and proximate impact that the proposed construction alternatives would have on the college, it is likely that they would negatively influence Randolph-Macon College's ability to continue to out-perform those statewide enrollment trends.

[35] "Population Projections by Age and Locality, 2020 to 2040," Weldon Cooper Center for Public Policy, June 2017.

VIRGINIA DEQ (continued)

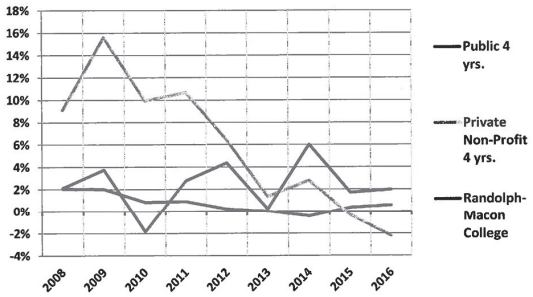

Figure 12: Year-Over-Year Change in Fall Headcount Enrollment[36]

Ashland as a "Train Town"

The last issue that emerged from our September 18 focus group with stakeholders that we address in this section is the impact that the proposed construction alternatives would have on Ashland's image as a "Train Town." As discussed earlier, many of the businesses along Center Street and Railroad Avenue indicated that much of their appeal to customers is linked directly to the Town of Ashland's general small-town ambiance and its reputation as a "train town." Moreover, that perspective is further supported by visitor data from the Ashland/Hanover Visitors Center that confirms that train-related activities such as the annual Ashland Train Day festival are responsible for a significant portion of the Center's visitor traffic. To the extent that the proposed construction alternatives negatively impacted that perceived image, they could have a significant and lasting negative impact on the character and economic vitality of the Town of Ashland that, although difficult to prospectively quantify, is nonetheless likely to be significant.

[36] *Data Source*: State Council of Higher Education for Virginia.

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VIRGINIA DEQ (continued)

Conclusion

This report has quantified the potential economic and fiscal impact on the Town of Ashland from proposed construction alternatives associated with Alternative Area 5, the ten-mile portion of the 123-mile DC2RVA High-Speed Rail Project that encompasses the Town of Ashland. The purpose of the DC2RVA High-Speed Rail Project is to increase rail capacity along the DC to Richmond corridor in order to provide reliable, frequent, and high-speed passenger service between D.C. and Richmond, and also to better accommodate freight rail movement through the corridor, including freight going to and from Virginia's ports. In addition to proposed improvements to stations, parking, signals, and other safety systems, the primary infrastructure improvement associated with the DC2RVA High-Speed Rail Project would be to add an additional main track to the existing two main tracks within this corridor.

After a lengthy review and public engagement process that began in 2014, in September of this year, the Federal Rail Administration (FRA) and the Virginia Department of Rail and Public Transportation (DRPT) issued their "Tier II Draft Environmental Impact Statement Section 4(f) Evaluation" report. That report proposed five general construction alternatives for the Ashland portion of the DC2RVA High-Speed Rail Project. Those alternatives were: 1) maintain two tracks through Ashland (the 3:2:3 option), 2) add one track east of the existing two tracks running through Ashland, 3) construct three tracks running through Ashland that would be centered within the existing right of way, 4) construct a three-track trench running through Ashland, and 5) add a two-track western bypass. Subsequent to the release of the draft EIS, the Hanover County Board of Supervisors passed a resolution endorsing the 3-2-3 construction alternative, while the Ashland Town Council passed a resolution endorsing the western bypass.

Our analysis focused on the two general categories of these proposed alternatives that are likely to have a significantly disruptive impact on the Town of Ashland's economy during their construction phase – proposals for an above-ground third-track through downtown Ashland (which are generally assumed to entail a two-year construction period), and construction of the three-track trench through downtown Ashland (which is generally assumed to entail a three-year construction period). Based on stakeholder focus group input, the results of an informal telephone survey of businesses along the existing railroad right of way on Center Street and Railroad Avenue, and a review of the existing empirical literature on the impact of transportation construction projects on adjacent businesses, we also constructed a *High Impact* and a *Low Impact* scenario around those proposed alternatives.

What that analysis showed was that, based on the *High Impact* scenario, construction-related business closures and reduced sales among businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road would generate an annual loss of approximately 133 full-

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VIRGINIA DEQ (continued)

MANGUM economics

time-equivalent jobs, $4.2 million in local labor income, and $10.9 million in local economic output within the Ashland/Hanover community. These losses would persist for at least two years under the above-ground third-track construction options, and at least three years under the three-track trench construction option, and then gradually abate over an unspecified period of time. In addition, our analysis indicated that the cumulative construction-related direct loss of tax revenue during the two-year construction period for the above-ground third-track construction options would likely be at least ($345,134) for the Town of Ashland, and ($179,296) for Hanover County. While, the cumulative construction-related direct loss of tax revenue during three-year construction period for the proposed three-track trench would likely be at least ($517,702) for the Town of Ashland, and ($268,944) for Hanover County.

Based on the *Low Impact* scenario, construction-related business closures and reduced sales among businesses located along Center Street and Railroad Avenue and between Vaughan Road and Ashcake Road would generate an annual loss of approximately 77 full-time-equivalent jobs, $3.0 million in local labor income, and $7.9 million in local economic output within the Ashland/Hanover community. As before, these losses would persist for at least two years under the above-ground third track construction options, and at least three years under the three-track trench construction option, and then gradually abate over an unspecified period of time. Our analysis also indicated that the cumulative construction-related direct loss of tax revenue during the two-year construction period for the above-ground third-track construction options would likely be at least ($140,891) for the Town of Ashland, and ($80,526) for Hanover County. While, the cumulative construction-related direct loss of tax revenue during three-year construction period for the proposed three-track trench would likely be at least ($211,337) for the Town of Ashland, and ($120,790) for Hanover County.

Finally, our analysis has also demonstrated that the construction of an above-ground third-track or the three-track trench through the center of Ashland would likely have negative impacts that, although difficult to quantify, are nonetheless important to qualify. Chief among those is the potential negative impact that the proposed construction alternatives could have on: 1) the 2,575 jobs, $51.1 million in payroll, and $13.8 million in state and local tax revenue that the Ashland/Hanover community derived from tourism, 2) the 447 faculty and staff jobs and $22.7 million in direct spending that Randolph-Macon College contributes to the Ashland/Hanover community, and 3) the attractiveness to tourists, shoppers, and residents that the Town of Ashland derives from its small-town quality of life and reputation as a "train town."

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VIRGINIA DEQ (continued)

MANGUM economics

Estimates provided in this report are based on the best information available and all reasonable care has been taken in assessing that information. However, because these estimates attempt to foresee circumstances that have not yet occurred, it is not possible to provide any assurance that they will be representative of actual events. These estimates are intended to provide a general indication of likely future outcomes and should not be construed to represent a precise measure of those outcomes.

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VIRGINIA DEQ (continued)

Howard, Janine (DEQ)

From: Sarah Stewart <sstewart@richmondregional.org>
Sent: Friday, October 13, 2017 3:55 PM
To: Howard, Janine (DEQ)
Subject: RE: NEW PROJECT FRA DC to Richmond Rail 17-134F

Janine,
We inquired with our member jurisdictions about this review. We received no comments from locality staffs. RRPDC staff reviewed the draft EIS and has no comments at this time.

Thank you,
Sarah Stewart

From: Fulcher, Valerie (DEQ) [mailto:Valerie.Fulcher@deq.virginia.gov]
Sent: Tuesday, September 12, 2017 2:05 PM
To: dgif-ESS Projects (DGIF) <ESSProjects@dgif.virginia.gov>; Tignor, Keith (VDACS) <Keith.Tignor@vdacs.virginia.gov>; Rhur, Robbie (DCR) <Robbie.Rhur@dcr.virginia.gov>; odwreview (VDH) <odwreview-VDH@cov.virginia.gov>; Dacey, Katy (DEQ) <Katy.Dacey@deq.virginia.gov>; Narasimhan, Kotur (DEQ) <Kotur.Narasimhan@deq.virginia.gov>; Gavan, Larry (DEQ) <Larry.Gavan@deq.virginia.gov>; Moore, Daniel (DEQ) <Daniel.Moore@deq.virginia.gov>; Sepety, Holly (DEQ) <Holly.Sepety@deq.virginia.gov>; West, Kelley (DEQ) <Kelley.West@deq.virginia.gov>; Burstein, Daniel (DEQ) <Daniel.Burstein@deq.virginia.gov>; Kirchen, Roger (DHR) <Roger.Kirchen@dhr.virginia.gov>; Evans, Gregory (DOF) <Gregory.Evans@dof.virginia.gov>; Watkinson, Tony (MRC) <Tony.Watkinson@mrc.virginia.gov>; Jordan, Elizabeth (VDOT) <Elizabeth.Jordan@VDOT.Virginia.gov>; rlazaro@novaregion.org; Ware, Tim <ware@gwregion.org>; Sarah Stewart <sstewart@richmondregional.org>; tfoley@co.stafford.va.us; dmorris@craterpdc.org; Leonardr@chesterfield.gov; Olinger, Mark A. - PDR <Mark.Olinger@Richmondgov.com>; Vithoulkas, John <vit@henrico.us>; ctyadm@co.hanover.va.us; Culley, Charles <cculley@co.caroline.va.us>; NDickinson@spotsylvania.va.us; Baroody, Tim <tjbaroody@fredericksburgva.gov>; Patton, Justin S. <jspatton@pwcgov.org>; Denise.James@fairfaxcounty.gov; Brian Stout <Bstout@arlingtonva.us>
Cc: Howard, Janine (DEQ) <Janine.Howard@deq.virginia.gov>
Subject: NEW PROJECT FRA DC to Richmond Rail 17-134F

Good afternoon - this is a new OEIR review request/project:

Document Type: Draft EIS
Project Sponsor: Federal Railroad Administration
Project Title: DC to Richmond Southeast High Speed Rail
Location: Cities of Richmond and Fredericksburg, Chesterfield, Henrico, Hanover, Caroline, Spotsylvania, Stafford, Prince William, Fairfax, and Arlington Counties
Project Number: DEQ #17-134F

The document is available at http://dc2rvarail.com/draft/.

The due date for comments is OCTOBER 10, 2017. You can send your comments either directly to JANINE HOWARD by email (Janine.Howard@deq.virginia.gov), or you can send your comments by regular interagency/U.S. mail to the Department of Environmental Quality, Office of Environmental Impact Review, 629 E. Main St., 6th Floor, Richmond, VA 23219.

NOTE: Visit http://dc2rvarail.com/draft/ to view the Draft EIS.

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VIRGINIA DEQ (continued)

Howard, Janine (DEQ)

From: Mark Bittner <mbittner@craterpdc.org>
Sent: Monday, September 25, 2017 9:34 AM
To: Howard, Janine (DEQ)
Cc: 'Dennis Morris'
Subject: FW: NEW PROJECT FRA DC to Richmond Rail 17-134F

Dear Ms. Howard:

Thank you for submitting the DC to Richmond Rail 17-134F project for review.

At this time the Crater Planning District Commission has no comments.

Please contact us if you have any questions.

Sincerely,

Mark Bittner

Mark Bittner
Crater Planning District Commission
Director of Planning & Information Technology
CPDC
(804) 861-1666 x237
mbittner@craterpdc.org
1964 Wakefield Street
Monument Professional Building
Petersburg, VA 23805
http://www.craterpdc.org

From: Fulcher, Valerie (DEQ) [mailto:Valerie.Fulcher@deq.virginia.gov]
Sent: Tuesday, September 12, 2017 2:05 PM
To: dgif-ESS Projects (DGIF); Tignor, Keith (VDACS); Rhur, Robbie (DCR); odwreview (VDH); Dacey, Katy (DEQ); Narasimhan, Kotur (DEQ); Gavan, Larry (DEQ); Moore, Daniel (DEQ); Sepety, Holly (DEQ); West, Kelley (DEQ); Burstein, Daniel (DEQ); Kirchen, Roger (DHR); Evans, Gregory (DOF); Watkinson, Tony (MRC); Jordan, Elizabeth (VDOT); rlazaro@novaregion.org; Ware, Tim; Sarah Stewart; tfoley@co.stafford.va.us; dmorris@craterpdc.org; Leonardr@chesterfield.gov; Olinger, Mark A. - PDR; Vithoulkas, John; ctyadm@co.hanover.va.us; Culley, Charles; NDickinson@spotsylvania.va.us; Baroody, Tim; Patton, Justin S.; Denise.James@fairfaxcounty.gov; Brian Stout
Cc: Howard, Janine (DEQ)
Subject: NEW PROJECT FRA DC to Richmond Rail 17-134F

Good afternoon - this is a new OEIR review request/project:

Document Type: Draft EIS
Project Sponsor: Federal Railroad Administration
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Project Number: DEQ #17-134F

The document is available at http://dc2rvarail.com/draft/.

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From: **Holma, Marc (DHR)** <Marc.Holma@dhr.virginia.gov>
Date: Mon, Sep 25, 2017 at 1:24 PM
Subject: draft EIS for SEHSR DC2RVA (2014-0666)
To: "Stock, Emily (DRPT)" <Emily.Stock@drpt.virginia.gov>
Cc: Kerri Barile <kbarile@dovetailcrg.com>

Emily,

Please let this email serve as DHR's response to the draft EIS for the SEHSR DC2RVA. We have no comments on the draft EIS beyond what has been already said via our comments per Section 106. We request that DRPT continue to consult with DHR pursuant to Section 106. 1

Sincerely,

Marc Holma

VIRGINIA DHR

1. The Department of Rail and Public Transportation (DRPT) is committed to continuing coordination of all cultural resource components with the Virginia Department of Historic Resources (VDHR) through completion of the Tier II environmental process, final design, and implementation, and will disseminate data as available, in accordance with Section 106 of the National Historic Preservation Act.