

# Appendix E2:

## Section 106 Correspondence

## Section 106 – Project Correspondence

This appendix contains letters from agencies regarding Section 106 that are referenced in the Draft EIS:

- Letter from the U.S. Department of Transportation – Federal Railroad Administration regarding the initiation of Section 106 Consultation for the Long Bridge Project, September 22, 2016.
- Letter from the U.S. Department of Transportation – Federal Railroad Administration regarding the National Historic Preservation Act Section 106 Consulting Party Invitation for the Long Bridge Project, March 31, 2017.
- Letter from the U.S. Department of Transportation – Federal Railroad Administration to the Virginia Department of Historic Resources regarding the National Historic Preservation Act Section 106 Consultation: area of potential effects and identification of historic properties on the Long Bridge Project, January 29, 2018.
- Letter from the U.S. Department of Transportation – Federal Railroad Administration to the District of Columbia State Historic Preservation Office regarding the National Historic Preservation Act Section 106 Consultation: area of potential effects and identification of historic properties on the Long Bridge Project, January 29, 2018.
- Letter from the District of Columbia State Historic Preservation Office concurrence with the Area of Potential Effects and Historic Properties Technical Report, March 23, 2018.
- Letter from Virginia Department of Historic Resources concurrence with the Area of Potential Effects and Historic Properties Technical Report, March 23, 2018.
- Letter from the U.S. Department of Transportation – Federal Railroad Administration regarding the National Historic Preservation Act Section 106 Consultation; Lead federal Agency Designation, July 31, 2018.
- Letter from Virginia Department of Historic Resources concurrence with the determination of adverse effect and the Phase IA Archaeological Assessment Draft Technical Report, November 9, 2018.
- Letter from the U.S. Army Corps of Engineers - Baltimore District designating the Federal Railroad Administration as the lead Federal agency for the National Historic Preservation Act Section 106 compliance, November 15, 2018.
- Letter from the Advisory Council on Historic Preservation regarding the adverse effects on a property or properties listed or eligible for listing in the National Register of Historic Places, December 21, 2018.
- Letter from the District of Columbia State Historic Preservation Office concurrence with the Assessment of Effects Report, February 11, 2019.



U.S. Department  
of Transportation

**Federal Railroad  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

**SEP 22 2016**

Mr. David Maloney  
State Historic Preservation Officer  
Washington, DC Office of Planning  
1100 4th Street, SW, Suite 650 East  
Washington, DC 20024

**Re: Initiation of Section 106 Consultation, Long Bridge Project**

Dear Mr. Maloney:

By way of this letter, the U.S. Department of Transportation's (DOT) Federal Railroad Administration (FRA) is initiating consultation under Section 106 of the National Historic Preservation Act (NHPA) (36 CFR § 800.3) for the Long Bridge Project (Project). The Project consists of potential improvements to the Long Bridge and related railroad infrastructure within a 3.2 mile corridor between Virginia Railway Express (VRE) Crystal City Station in Arlington, VA and Control Point Virginia near 3<sup>rd</sup> Street, SW in Washington, DC (Enclosure 1).

FRA has provided grant funding to the District of Columbia Department of Transportation (DDOT) for preliminary engineering (PE) and environmental review for the Project. Accordingly, FRA and DDOT are joint lead agencies in the preparation of an Environmental Impact Statement (EIS) pursuant to the National Environmental Policy Act (NEPA). Currently, there is no construction funding for the Long Bridge Project; however, FRA is initiating Section 106 consultation because the agency may provide such funding in the future. Should the Project receive future federal funding for construction, the intent is that FRA or any other lead federal agency could rely on the environmental analysis and Section 106 consultation that has been conducted at this PE stage.

**Project Background**

The purpose of the Project is to address reliability and long-term railroad capacity issues for the Long Bridge corridor. The Project will develop alternatives that would increase capacity to meet projected demand for passenger and freight rail services; improve operational flexibility and resiliency; and provide redundancy for this critical link in the local, regional, and national railroad network.

The current Long Bridge was constructed in 1904 and is owned and maintained by CSX Transportation (CSXT). It is the only freight railroad crossing over the Potomac River between the District of Columbia and Virginia. Currently, the two-track bridge serves CSXT freight trains, National Railroad Passenger Corporation (Amtrak) passenger rail, and VRE commuter rail. Norfolk-Southern retains trackage rights to operate over the bridge but does not exercise them today.

The Long Bridge is located within the Washington Monumental Core, and is a contributing element to the East and West Potomac Park Historic District. The project area includes federal park land managed by the National Park Service; historic and cultural properties (Enclosure 2); the Potomac River; offices, hotels, and apartment buildings; transportation facilities; and numerous pedestrian and bicycle trails.

**Section 106 Consultation**

As defined in 36 CFR § 800.16(f), Section 106 consultation "means the process of seeking, discussing, and considering the views of other participants, and where feasible, seeking agreement." FRA will manage the consultation process to ensure the meaningful involvement of all consulting parties while working to seek agreement, where feasible, among all the parties about: why properties are historically significant, and to whom; what historic properties may be affected should the Project advance to construction; and how any adverse effects to historic properties might be avoided, minimized, or mitigated.

FRA is coordinating Section 106 consultation with the preparation of the EIS, beginning with the identification of consulting parties through the scoping process, in a manner consistent with the standards set out in 36 CFR 800.8. A Notice of Intent (NOI) to prepare the EIS was published in the Federal Register on August 26, 2016. In a letter from FRA dated August 15, 2016, your agency was invited to participate in scoping.

FRA will provide a schedule for Section 106 public involvement and consultation, and invite you to meetings relevant to the Section 106 process for the Project. A consulting party Section 106 kick-off meeting is planned for October 2016, with more information to follow. Public outreach will include outreach to an extensive list of agencies, organizations, and individuals to facilitate information exchanges and solicit input during the development and evaluation of alternatives. Enclosed is a list of potential consulting parties that FRA has identified (Enclosure 3). We welcome your input and comments on this list within 30 days from the date on this letter.

FRA looks forward to consulting with you on the Long Bridge Project. All responses can be mailed to: Amanda Murphy, Environmental Protection Specialist, USDOT FRA, Office of Railroad Policy and Development, 1200 New Jersey Avenue SE., MS-20, Washington, DC 20590 or via e-mail at [amanda.murphy2@dot.gov](mailto:amanda.murphy2@dot.gov). If you have questions or concerns, please contact Ms. Murphy at (202) 493-0624.

Sincerely,

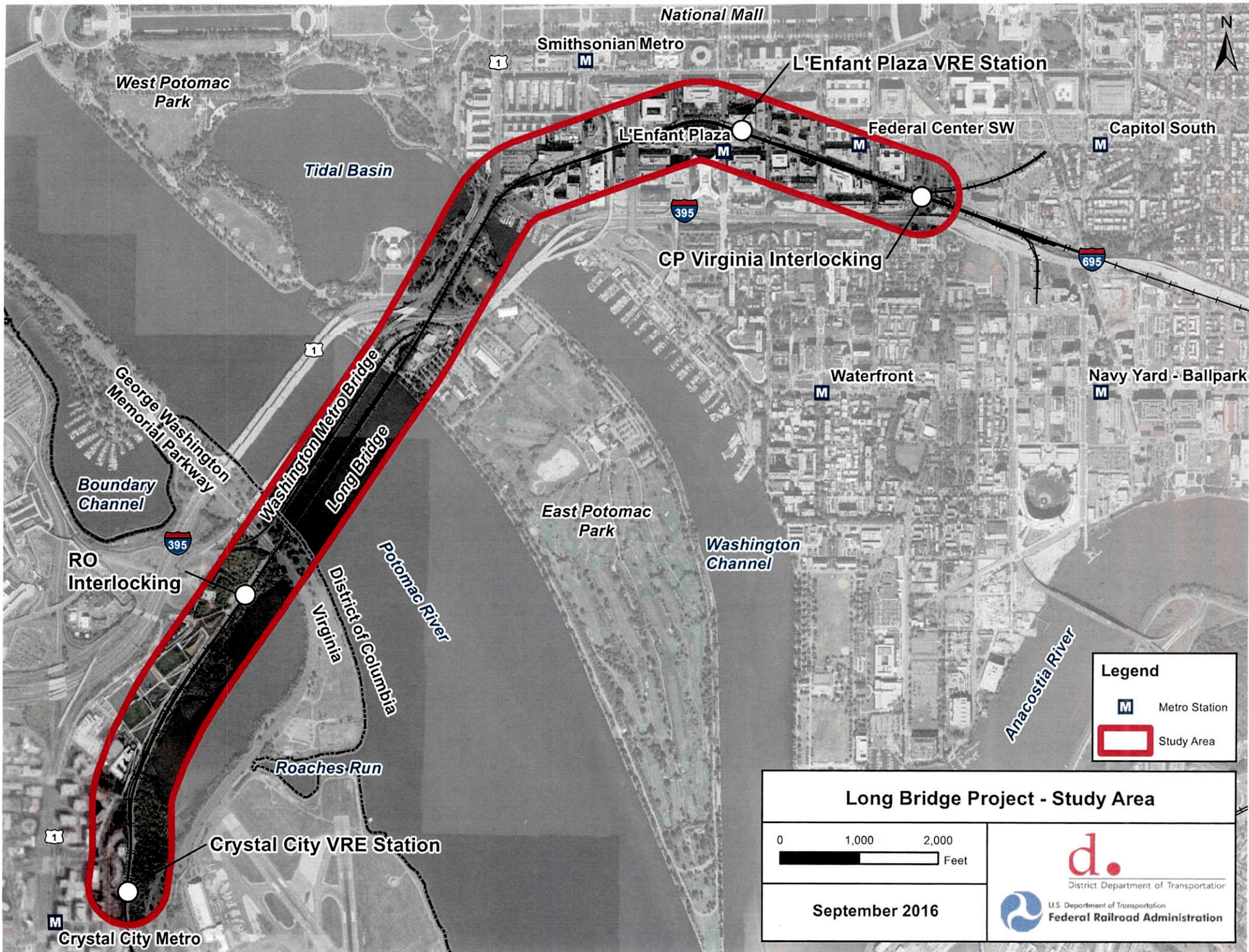
A handwritten signature in black ink, appearing to read "Michael Johnsen", with a long horizontal line extending to the right.

Michael Johnsen  
Acting Chief  
Environment and Corridor Planning Division

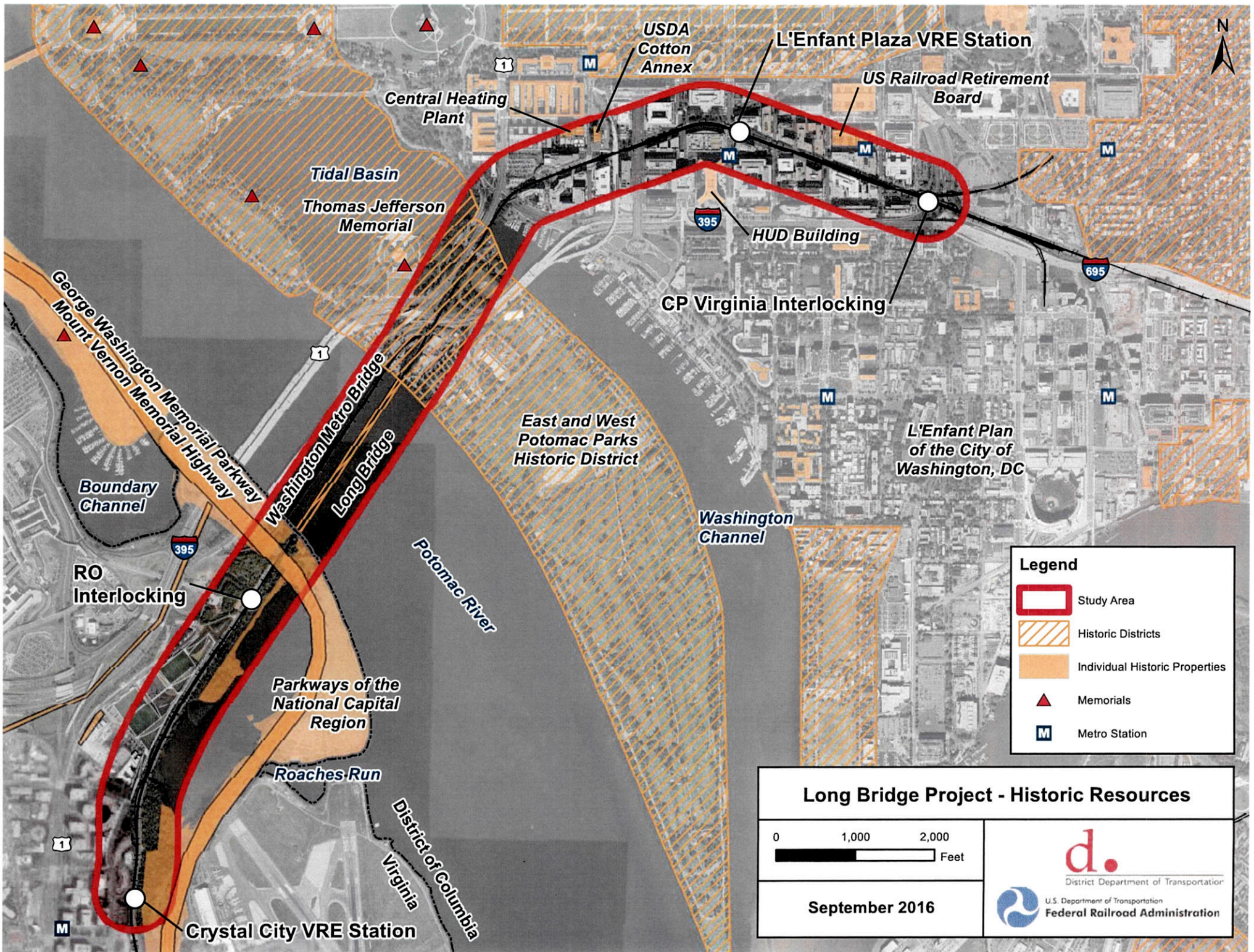
Enclosures:      Project Area Map  
                      Historic Properties Within in Project Area  
                      List of Potential Consulting Parties

cc:                Amanda Murphy, FRA  
                      Anna Chamberlin, DDOT















**Legend**

-  Study Area
-  Historic Districts
-  Individual Historic Properties
-  Memorials
-  Metro Station


**Long Bridge Project - Historic Resources**

0 1,000 2,000 Feet

September 2016



District Department of Transportation



U.S. Department of Transportation  
Federal Railroad Administration



**LONG BRIDGE PROJECT:****NHPA SECTION 106 POTENTIAL CONSULTING PARTIES**

<b>Organization</b>	<b>Project Interest</b>
CSX	Long Bridge Owner/Operator; may provide construction funding
Virginia Department of Rail and Public Transit	State agency that may provide construction funding
Committee of 100 on the Federal City	Local historic preservation and city planning organization
US Commission of Fine Arts	Project in area of jurisdiction (Washington Monumental Core)
DC Department of Transportation	Grantee/Joint Lead Agency for EIS
DC Preservation League	Local preservation organization
National Park Service National Mall and Memorial Parks	Property owner – bridge land and river bottom
National Capital Planning Commission	Federal agency with approval authority for federal construction projects
Virginia Railway Express	Rail operator through the Long Bridge corridor
Amtrak	Rail operator through the Long Bridge corridor
GSA National Capital Region	Owner of historic buildings in the project area
Federal Transit Administration	Federal agency that may provide funding for construction. Transit stations and rail lines in the study area.
Arlington Historical Society	Local historic preservation organization
Arlington Historic Preservation Office	Local government – historic preservation

***NOTE: Section 106 consultation initiation letters were sent to the DC SHPO and VADHR***



U.S. Department  
of Transportation

**Federal Railroad  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

**SEP 22 2016**

Ms. Julie Langan  
State Historic Preservation Officer  
Virginia Department of Historic Resources  
2801 Kensington Avenue  
Richmond, VA 23221

**Re: Initiation of Section 106 Consultation, Long Bridge Project**

Dear Ms. Langan:

By way of this letter, the U.S. Department of Transportation's (DOT) Federal Railroad Administration (FRA) is initiating consultation under Section 106 of the National Historic Preservation Act (NHPA) (36 CFR § 800.3) for the Long Bridge Project (Project). The Project consists of potential improvements to the Long Bridge and related railroad infrastructure within a 3.2 mile corridor between Virginia Railway Express (VRE) Crystal City Station in Arlington, VA and Control Point Virginia near 3<sup>rd</sup> Street, SW in Washington, DC (Enclosure 1).

FRA provided grant funding to the District of Columbia Department of Transportation (DDOT) for preliminary engineering (PE) and environmental review for the Project. Accordingly, FRA and DDOT are joint lead agencies in the preparation of an Environmental Impact Statement (EIS) pursuant to the National Environmental Policy Act (NEPA). Currently, there is no construction funding for the Long Bridge Project; however, FRA is initiating Section 106 consultation because the agency may provide such funding in the future. Should the Project receive future federal funding for construction, the intent is that FRA or any other lead federal agency could rely on the environmental analysis and Section 106 consultation that has been conducted at this PE stage.

**Project Background**

The purpose of the Project is to address reliability and long-term railroad capacity issues for the Long Bridge corridor. The Project will develop alternatives that would increase capacity to meet projected demand for passenger and freight rail services; improve operational flexibility and resiliency; and provide redundancy for this critical link in the local, regional, and national railroad network.

The current Long Bridge was constructed in 1904 and is owned and maintained by CSX Transportation (CSXT). It is the only freight railroad crossing over the Potomac River between the District of Columbia and Virginia. Currently, the two-track bridge serves CSXT freight trains, National Railroad Passenger Corporation (Amtrak) passenger rail, and VRE commuter rail. Norfolk-Southern retains trackage rights to operate over the bridge but does not exercise them today.

The Long Bridge is located within the Washington Monumental Core, and is a contributing element to the East and West Potomac Park Historic District. The project area includes federal park land managed by the National Park Service; historic and cultural properties (Enclosure 2); the Potomac River; offices, hotels, and apartment buildings; transportation facilities; and numerous pedestrian and bicycle trails.

**Section 106 Consultation**

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and considering the views of other participants, and where feasible, seeking agreement." FRA will manage the consultation process to ensure the meaningful involvement of all consulting parties while working to seek agreement, where feasible, among all the parties about: why properties are historically significant, and to whom; what historic properties may be affected should the Project advance to construction; and how any adverse effects to historic properties might be avoided, minimized, or mitigated.

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FRA will provide a schedule for Section 106 public involvement and consultation, and invite you to meetings relevant to the Section 106 process for the Project. A consulting party Section 106 kick-off meeting is planned for October 2016, with more information to follow. Public outreach will include outreach to an extensive list of agencies, organizations, and individuals to facilitate information exchanges and solicit input during the development and evaluation of alternatives. Enclosed is a list of potential consulting parties that FRA has identified (Enclosure 3). We welcome your input and comments on this list within 30 days from the date on this letter.

FRA looks forward to consulting with you on the Long Bridge Project. All responses can be mailed to: Amanda Murphy, Environmental Protection Specialist, USDOT FRA, Office of Railroad Policy and Development, 1200 New Jersey Avenue SE., MS-20, Washington, DC 20590 or via e-mail at [amanda.murphy2@dot.gov](mailto:amanda.murphy2@dot.gov). If you have questions or concerns, please contact Ms. Murphy at (202) 493-0624.

Sincerely,

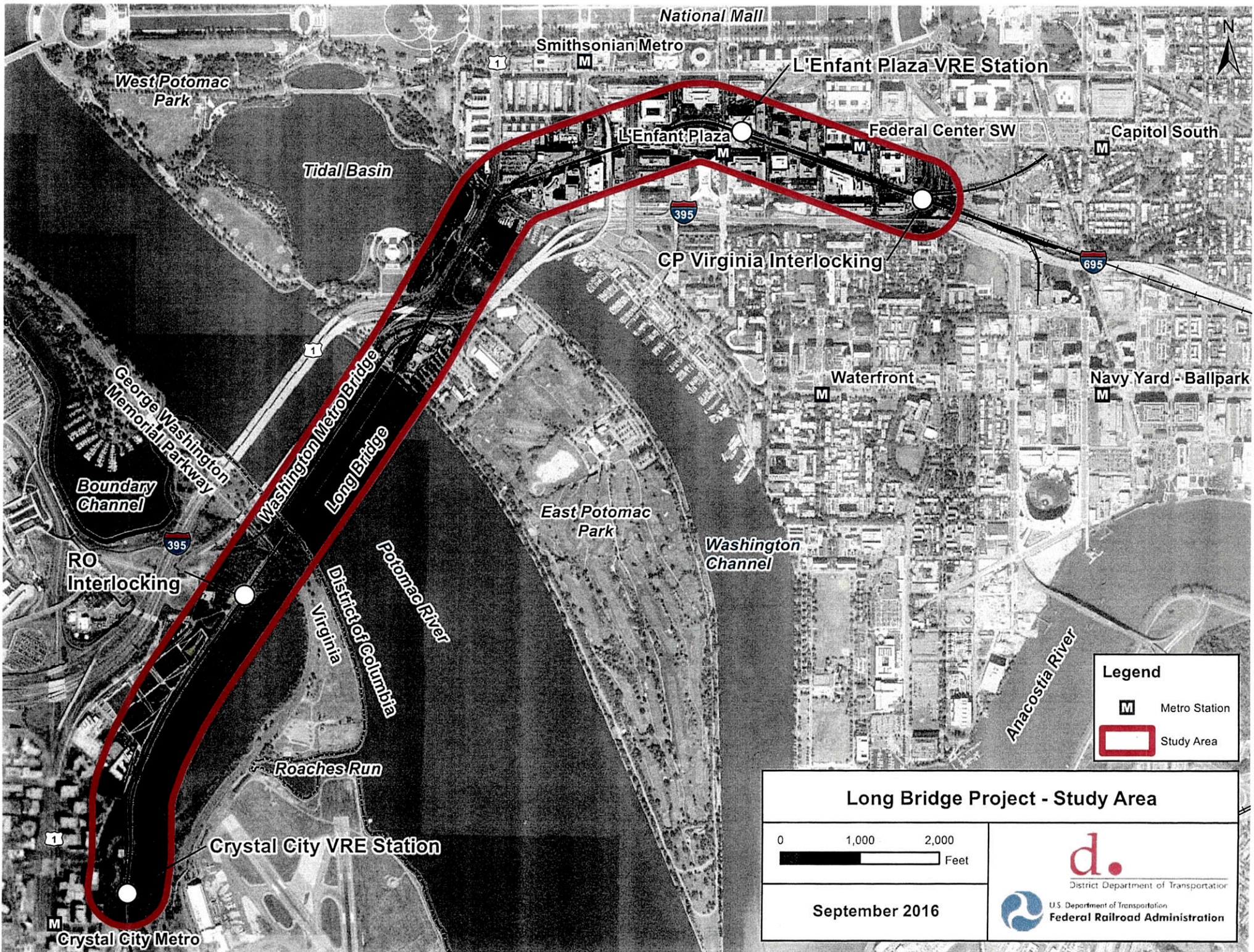


Michael Johnsen  
Acting Chief  
Environment and Corridor Planning Division

Enclosures: Project Area Map  
Historic Properties Within in Project Area  
List of Potential Consulting Parties

cc: Amanda Murphy, FRA  
Anna Chamberlin, DDOT

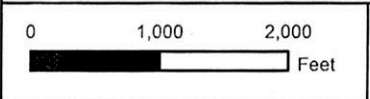




**Legend**

- M Metro Station
- Study Area

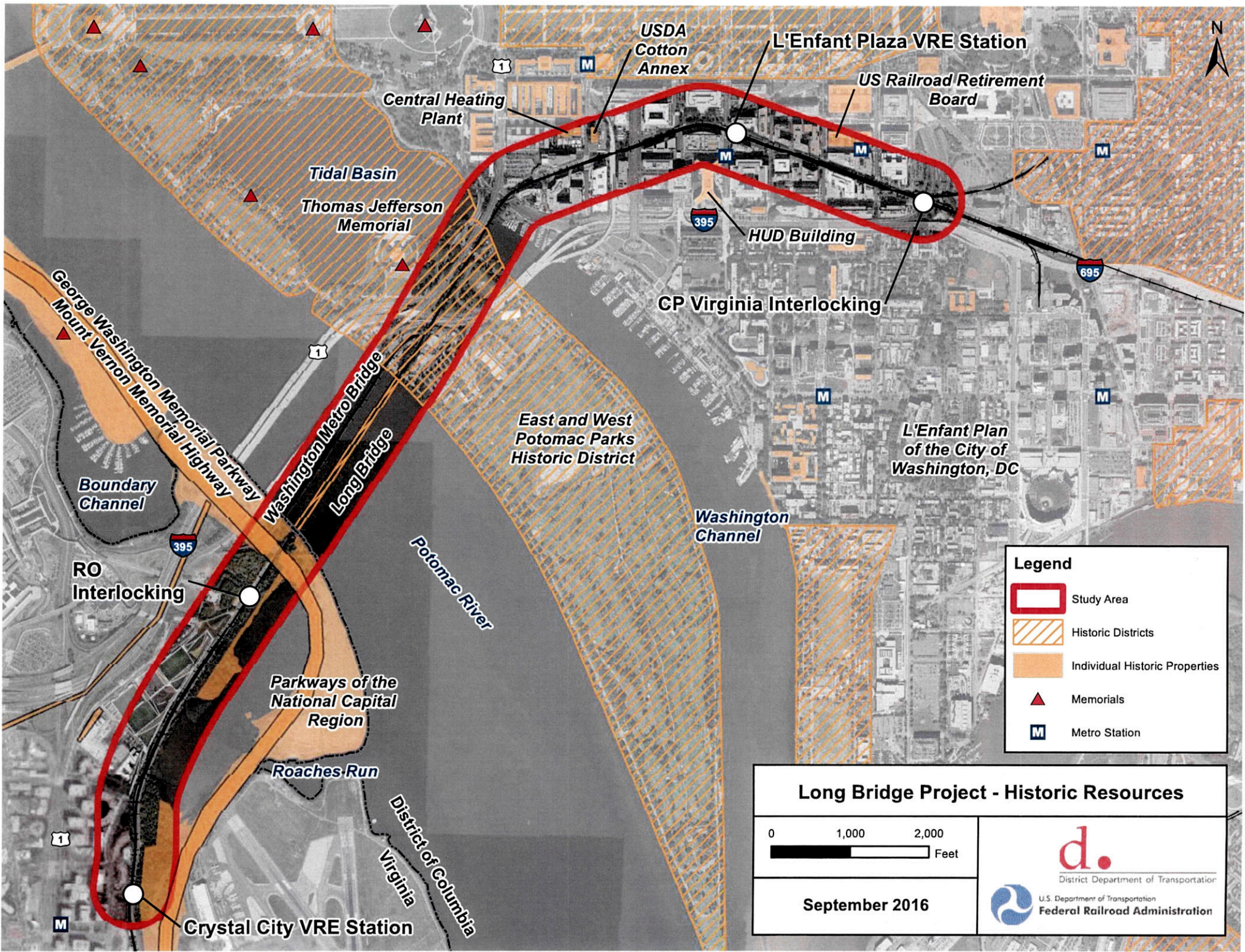
**Long Bridge Project - Study Area**



September 2016







USDA Cotton Annex  
 L'Enfant Plaza VRE Station  
 US Railroad Retirement Board  
 Central Heating Plant

Tidal Basin  
 Thomas Jefferson Memorial

HUD Building  
 CP Virginia Interlocking

East and West Potomac Parks Historic District

L'Enfant Plan of the City of Washington, DC

George Washington Memorial Parkway  
 Mount Vernon Memorial Highway  
 Boundary Channel

Washington Metro Bridge  
 Long Bridge

Potomac River

Washington Channel

RO Interlocking






Parkways of the National Capital Region

Roaches Run

District of Columbia  
 Virginia

Crystal City VRE Station


**Legend**

-  Study Area
-  Historic Districts
-  Individual Historic Properties
-  Memorials
-  Metro Station


**Long Bridge Project - Historic Resources**

0 1,000 2,000 Feet

September 2016



District Department of Transportation



U.S. Department of Transportation  
 Federal Railroad Administration



**LONG BRIDGE PROJECT:**

**NHPA SECTION 106 POTENTIAL CONSULTING PARTIES**

<b>Organization</b>	<b>Project Interest</b>
CSX	Long Bridge Owner/Operator; may provide construction funding
Virginia Department of Rail and Public Transit	State agency that may provide construction funding
Committee of 100 on the Federal City	Local historic preservation and city planning organization
US Commission of Fine Arts	Project in area of jurisdiction (Washington Monumental Core)
DC Department of Transportation	Grantee/Joint Lead Agency for EIS
DC Preservation League	Local preservation organization
National Park Service National Mall and Memorial Parks	Property owner – bridge land and river bottom
National Capital Planning Commission	Federal agency with approval authority for federal construction projects
Virginia Railway Express	Rail operator through the Long Bridge corridor
Amtrak	Rail operator through the Long Bridge corridor
GSA National Capital Region	Owner of historic buildings in the project area
Federal Transit Administration	Federal agency that may provide funding for construction. Transit stations and rail lines in the study area.
Arlington Historical Society	Local historic preservation organization
Arlington Historic Preservation Office	Local government – historic preservation

***NOTE: Section 106 consultation initiation letters were sent to the DC SHPO and VADHR***





U.S. Department  
of Transportation

1200 New Jersey Avenue, SE  
Washington, DC 20590

**Federal Railroad  
Administration**

March 31, 2017

Mr. Christer Ahl, President  
Crystal City Civic Association  
1805 Crystal Drive #711  
Arlington, VA 22202

**Re: National Historic Preservation Act Section 106 Consulting Party Invitation  
Long Bridge Project – Washington, DC and Arlington County, Virginia**

Dear Mr. Ahl:

The Federal Railroad Administration (FRA) is the lead federal agency responsible for conducting consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR § 800 (Section 106) for the Long Bridge Project (the Project). The Project consists of potential improvements to the Long Bridge and related railroad infrastructure between the District of Columbia and Arlington, Virginia. The purpose of this letter is to provide background information on the Project and invite your organization or agency participate in the Section 106 process as a consulting party.

Long Bridge Project Background

The existing Long Bridge was constructed in 1904, and is owned and maintained by CSX Transportation (CSXT). Currently, the two-track bridge serves CSXT freight trains, National Railroad Passenger Corporation (Amtrak) passenger rail, and Virginia Railway Express (VRE) commuter rail. Norfolk-Southern retains trackage rights to operate over the bridge but does not exercise them currently.

The purpose of the Project is to provide additional long-term rail capacity to improve the reliability of rail service through the Long Bridge corridor. Currently, there is insufficient capacity, resiliency, and redundancy to accommodate the projected demand in future rail services. The Project is needed to address these issues and to ensure the Long Bridge corridor continues to serve as a critical link connecting the local, regional, and national railroad network. Additional information is available on the Long Bridge Project website: [www.longbridgeproject.com](http://www.longbridgeproject.com).

Long Bridge Project Section 106, EIS, and Consulting Party Role

FRA provided grant funding to the District Department of Transportation (DDOT) for preliminary engineering and environmental review for the Project. Currently, there is no funding for construction of the Project, but Section 106 consultation is being conducted because FRA may provide construction funding in the future.

The purpose of the Section 106 consultation process is to identify historic properties that could be affected by the proposed Project; assess adverse effects on those properties; and develop ways to resolve those effects through appropriate avoidance, minimization, and/or mitigation measures. By way of this letter, FRA is inviting your agency or organization to participate as a consulting party in the Section 106 process pursuant to 36 CFR § 800.3(f). If you would like more information regarding the role of a Section 106 consulting party, FRA encourages you to review the Advisory Council on Historic Preservation's *Citizen's Guide to Section 106 Review*: <http://www.achp.gov/docs/CitizenGuide.pdf>.

FRA is coordinating Section 106 consultation with the National Environmental Policy Act (NEPA) process. To comply with NEPA, FRA and DDOT are preparing an Environmental Impact Statement (EIS) to analyze potential impacts associated with the range of alternatives under consideration. FRA published a Notice of Intent (NOI) to prepare the EIS in the Federal Register on August 26, 2016. Following the NOI publication, a 45-day public scoping period commenced. In conjunction with the scoping period, FRA initiated the Section 106 process with the District of Columbia State Historic Preservation Officer (DC SHPO) and Virginia Department of Historic Resources (VDHR). Interagency and public scoping meetings were held on September 14, 2016.

### Historic Properties

The Long Bridge is a contributing resource to the East and West Potomac Parks Historic District. FRA and DDOT conducted a preliminary identification of historic properties within or adjacent to the Long Bridge corridor, which extends approximately 3.2 miles from the VRE Crystal City Station in Arlington, VA to Control Point Virginia located near 3rd Street SW in Washington, DC. Please see the attachment to review the historic properties that have been identified to date.

### Next Steps

FRA and DDOT invite you to attend the first Section 106 consulting parties meeting for the Long Bridge Project scheduled for **Tuesday, April 25, 2017 at the DDOT Office, 55 M Street, SE, Washington, DC or via teleconference from 1:00 – 3:00 PM EST** (conference line information will be provided in a separate communication). We would appreciate your participation in this meeting to provide feedback that will help guide the identification of historic properties.

**If you wish to participate as a consulting party, please complete the attached form and return it to FRA by April 28, 2017.** If you do not respond to this invitation, you may request consulting party status in the future; however, the Project will advance and you may not have an opportunity to comment on previous steps. If you are not the appropriate point of contact for your organization, please feel free to forward this communication.

FRA and DDOT appreciate your interest in the Long Bridge Project. If you have any questions about the Project or the Section 106 process, please contact Amanda Murphy, FRA Environmental Protection Specialist, at (202) 493-0624 or [amanda.murphy2@dot.gov](mailto:amanda.murphy2@dot.gov).

Sincerely,



Laura Shick  
Federal Preservation Officer  
Environmental & Corridor Planning Division  
Office of Railroad Policy and Development

### Attachments:

Consulting Party Invitation Response Form  
Cultural Resources Preliminary Data Collection

cc: Amanda Murphy, FRA  
Anna Chamberlain, DDOT  
David Maloney, DC SHPO  
Andrew Lewis, DC SHPO  
Julie Langan, VDHR  
Ethel Eaton, VDHR



I would like to participate as a Section 106 consulting party for the Long Bridge Project:

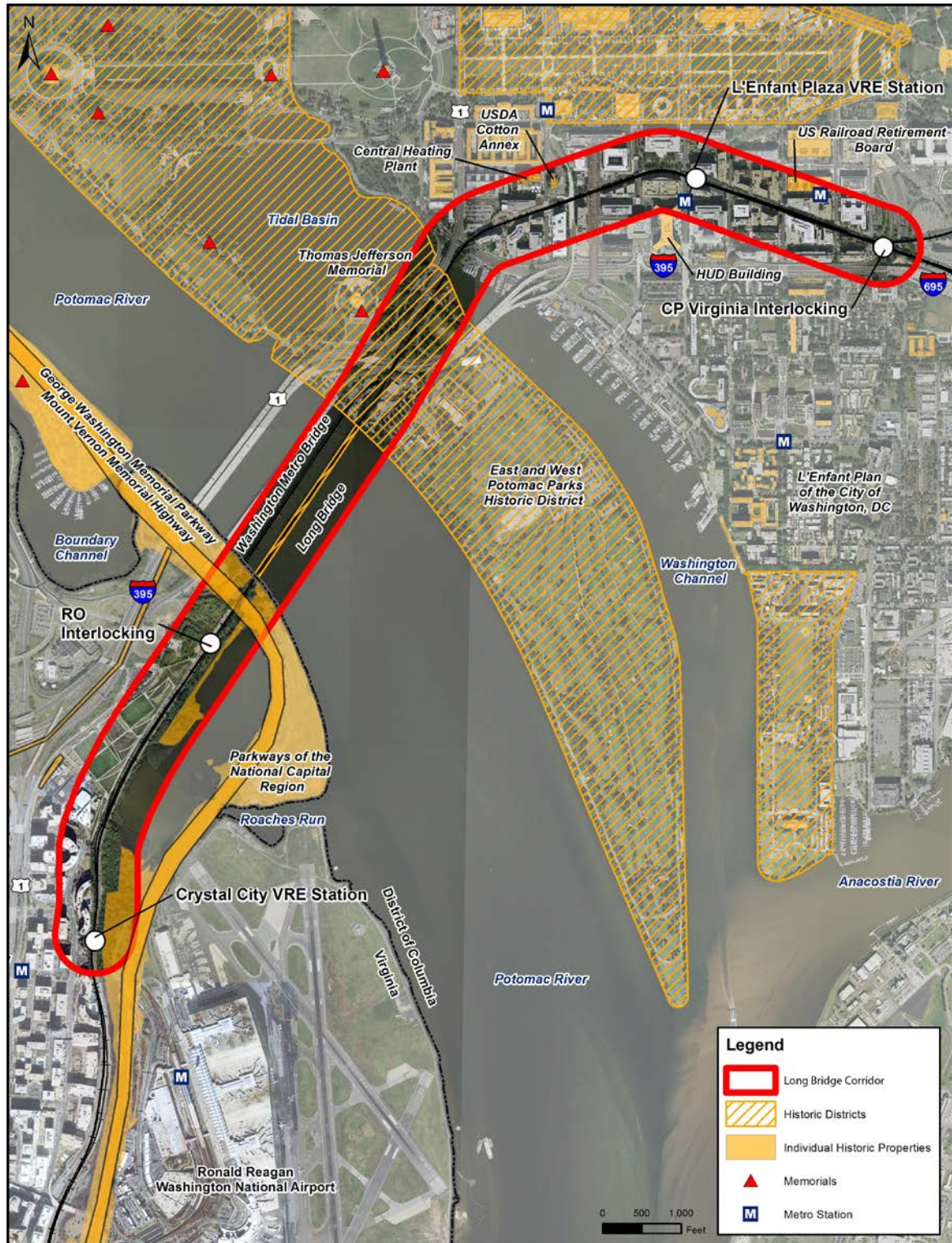
Contact Name (Print)	Organization/Agency	
Address	State	Zip Code
Phone Number	Email Address	
Signature	Date	

Please return a response by **April 28, 2017** to:

**Email:** [amanda.murphy2@dot.gov](mailto:amanda.murphy2@dot.gov)



| Preliminary Identification - Historic properties within and near the Long Bridge Corridor



| Preliminary Identification - Historic properties within and near the Long Bridge Corridor

Name	Owner	Location	Historic Significance	NRHP ID	State ID
<b>Parkways of the National Capital Region</b>	NPS	Washington Region Multi-Property Submission	Multi-property submission for scenic parkways of the Washington, DC region including George Washington Memorial Parkway and Mount Vernon Memorial Highway.	NRHP# 64500086	DHR# 029-5524
<b>L'Enfant Plan of the City of Washington, DC</b>	NPS-NCR	Washington Region Multi-Property Submission	Multi-property submission for the street grid, diagonal avenues, parks, vistas among monuments and sites over federal land within the L'Enfant Plan boundary, and the airspace above this matrix up to the legal height limit in the City	NRHP#97 000332	--
<b>East and West Potomac Parks Historic District</b>	NPS-NAMA	Washington, DC	Historic district comprising 730 acres of park land along the Potomac River. Standing memorials in the parks include the Lincoln and Jefferson Memorial. The Long Bridge (aka, the Potomac River Swing Bridge) was also identified as a contributing element to the historic district.	NRHP# 73000217	ID#D_028
<b>Thomas Jefferson Memorial</b>	NPS-NAMA	East Basin Drive SW, Washington, DC	National Memorial dedicated to Thomas Jefferson.	NRHP# 66000029	ID#L_0296
<b>Central Heating Plant</b>	GSA	325 13 <sup>th</sup> Street SW, Washington, DC	A heating plant completed in 1936 to supply steam to Federal buildings. Designed under the guidance of the US Commission of Fine Arts.	NRHP# 07000637	ID#L_0289 /L_0704
<b>USDA<sup>1</sup> Cotton Annex</b>	GSA	300 12 <sup>th</sup> Street SW, Washington, DC	The Bureau of Agricultural Economics (BAE) Building, now known as the Cotton Annex, was built in 1936–1937 for the US Department of Agriculture (USDA) under the auspices of Supervising Architect of the Treasury Louis A. Simon (1933–1939).	NRHP# 15000683	ID#L_1458
<b>HUD Building (Robert C. Weaver Federal Building)</b>	HUD	451 7th Street, SW, Washington, DC	Completed in 1968 by the architect Marcel Breuer. The modernist design and execution of the HUD building exemplifies the primary tenets of the "Guiding Principles for Federal Architecture" as set forth by President John F. Kennedy's administration in 1962.	NRHP# 08000824	ID#L_0703
<b>US Railroad Retirement Board (Mary Switzer Building)</b>	GSA	330 C Street SW, Washington, DC	Built during the Federal office construction program of the 1920s and 1930s for the Railroad Retirement Board (established 1934), and associated with the establishment of a nationwide pension program; illustrates sustained implementation of the McMillan Plan.	NRHP# 07000638	ID#L_0706
<b>George Washington Memorial Parkway</b>	NPS-GWMP <sup>1</sup>	Arlington County (extends beyond Study Area to City of Alexandria and Fairfax County)	38.3-mile scenic parkway commemorating the birth of George Washington.	NRHP# 95000605	DHR# 029-0218; 029-5524; DHR# 029-0228
<b>Mount Vernon Memorial Highway</b>	NPS-GWMP	Arlington County (extends beyond Study Area to City of Alexandria and Fairfax County)	Original 15.2-mile segment of the scenic parkway commemorating the birth of George Washington.	NRHP# 81000079	DHR# 029-0218; 029-5524



U.S. Department  
of Transportation

**Federal Railroad  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

**DRAFT1/29/2018**

Ms. Julie Langan  
State Historic Preservation Officer  
Virginia Department of Historic Resources  
2801 Kensington Avenue  
Richmond, VA 23221

**Re: National Historic Preservation Act Section 106 Consultation  
Identification of Historic Properties, the Long Bridge Project**

Dear Ms. Langan:

The Federal Railroad Administration (FRA) is the lead Federal agency responsible for conducting consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations of 36 CFR Part 800 (Section 106) for the Long Bridge Project (the Project). The Project consists of potential improvements to the Long Bridge and related railroad infrastructure between the District of Columbia and Arlington, Virginia. FRA is coordinating the Section 106 process with the preparation of an Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act (NEPA). The District Department of Transportation (DDOT) is the joint lead agency for the EIS. The purpose of this letter is to solicit concurrence on the Area of Potential Effects (APE) and identification of historic properties for the Project.

#### Section 106 Background

FRA initiated Section 106 consultation with the District of Columbia State Historic Preservation Officer (DC SHPO) and Virginia Department of Historic Resources (VDHR) on September 22, 2016. FRA and DDOT jointly conducted two Section 106 consulting party meetings on April 25 and November 15, 2017. The feedback received during these meetings and in the subsequent comment periods informed the development of the APE and identification of historic properties. Enclosed for your review is a technical report that documents the APE and historic properties that might be affected by the Project.

As presented at the November 15, 2017 consulting parties meeting, assumptions for the delineation of the APE and Limits of Disturbance (LOD) were based on results of the Level 1 Concept Screening presented to the public in May 2017. Subsequently, at an interagency meeting for the EIS held on December 12, 2017, FRA and DDOT presented the two proposed action alternatives for evaluation in the Draft Environmental Impact Statement (DEIS).<sup>1</sup> These two proposed alternatives are:

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<sup>1</sup>DC SHPO and VDHR were in attendance and provided comments at, and following, the interagency meeting.



- Construct a new two-track bridge upstream of the Long Bridge and retain the existing bridge; and
- Construct a new two-track bridge upstream of the Long Bridge and replace the existing bridge with a new two-track bridge.

FRA and DDOT are continuing to explore the opportunity to provide a bike-pedestrian connection on a new railroad bridge, or on a separated structure upstream or downstream of a railroad bridge. While the APE would not change based on the selection of alternatives, the LOD may be refined, in consultation with VDHR and DC SHPO, as the Project and engineering progresses. FRA and DDOT are also currently conducting a Phase 1A archaeological survey to identify archaeological resources within the LOD. This information will be shared with DC SHPO and VDHR as it become available in order to inform the assessment of effects on historic properties pursuant to 36 CFR Part 800.5.

#### Next Steps

FRA requests your concurrence on the APE and identification of historic properties within 30 days of the date on this letter. FRA and DDOT appreciate your continued participation in the Project and look forward to continuing the Section 106 consultation process with your office. Please direct all correspondence regarding this Project and Section 106 process to Amanda Murphy, FRA Environmental Protection Specialist, at (202) 493-0624 or [amanda.murphy2@dot.gov](mailto:amanda.murphy2@dot.gov).

Sincerely,

Laura Shick  
Federal Preservation Officer  
Environmental & Corridor Planning Division  
Office of Railroad Policy and Development

#### Attachments:

Area of Potential Effects and Historic Properties Technical Report

cc: Amanda Murphy, FRA  
Anna Chamberlain, DDOT  
Ethel Eaton, VDHR





U.S. Department  
of Transportation

**Federal Railroad  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

**DRAFT 1/29/2018**

Mr. David Maloney  
State Historic Preservation Officer  
D.C. Office of Planning  
1100 4th Street, SW, Suite 650 East  
Washington, DC 20024

**Re: National Historic Preservation Act Section 106 Consultation: Area of Potential Effects and Identification of Historic Properties, the Long Bridge Project**

Dear Mr. Maloney:

The Federal Railroad Administration (FRA) is the lead Federal agency responsible for conducting consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations of 36 CFR Part 800 (Section 106) for the Long Bridge Project (the Project). The Project consists of potential improvements to the Long Bridge and related railroad infrastructure between the District of Columbia and Arlington, Virginia. FRA is coordinating the Section 106 process with the preparation of an Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act (NEPA). The District Department of Transportation (DDOT) is the joint lead agency for the EIS. The purpose of this letter is to solicit concurrence on the Area of Potential Effects (APE) and identification of historic properties for the Project.

#### Section 106 Background

FRA initiated Section 106 consultation with the District of Columbia State Historic Preservation Officer (DC SHPO) and Virginia Department of Historic Resources (VDHR) on September 22, 2016. FRA and DDOT jointly conducted two Section 106 consulting party meetings on April 25 and November 15, 2017. The feedback received during these meetings and in the subsequent comment periods informed the development of the APE and identification of historic properties. Enclosed for your review is a technical report that documents the APE and historic properties that might be affected by the Project.

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<sup>1</sup> DC SHPO and VDHR were in attendance and provided comments at, and following, the interagency meeting.

- Construct a new two-track bridge upstream of the Long Bridge and retain the existing bridge; and
- Construct a new two-track bridge upstream of the Long Bridge and replace the existing bridge with a new two-track bridge.

FRA and DDOT are continuing to explore the opportunity to provide a bike-pedestrian connection on a new railroad bridge, or on a separated structure upstream or downstream of a railroad bridge. While the APE would not change based on the selection of alternatives, the LOD may be refined, in consultation with VDHR and DC SHPO, as the Project and engineering progresses. FRA and DDOT are also currently conducting a Phase 1A archaeological survey to identify archaeological resources within the LOD. This information will be shared with DC SHPO and VDHR as it become available in order to inform the assessment of effects on historic properties pursuant to 36 CFR Part 800.5.

#### Next Steps

FRA requests your concurrence on the APE and identification of historic properties within 30 days of the date on this letter. FRA and DDOT appreciate your continued participation in the Project and look forward to continuing the Section 106 consultation process with your office. Please direct all correspondence regarding this Project and Section 106 process to Amanda Murphy, FRA Environmental Protection Specialist, at (202) 493-0624 or [amanda.murphy2@dot.gov](mailto:amanda.murphy2@dot.gov).

Sincerely,

Laura Shick  
Federal Preservation Officer  
Environmental & Corridor Planning Division  
Office of Railroad Policy and Development

#### Attachments:

Area of Potential Effects and Historic Properties Technical Report

cc: Amanda Murphy, FRA  
Anna Chamberlain, DDOT  
Andrew Lewis, DC SHPO

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
STATE HISTORIC PRESERVATION OFFICER



March 23, 2018

Ms. Laura Shick, Federal Preservation Officer  
Environment and Corridor Planning Division  
Office of Railroad Policy and Development  
U.S. Department of Transportation  
Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

RE: Area of Potential Effect and Identification of Historic Properties for the Long Bridge Project

Dear Ms. Shick:

Thank you for continuing to consult with the District of Columbia State Historic Preservation Officer (DC SHPO) regarding the above-referenced undertaking and for providing the document entitled *Area of Potential Effects and Historic Properties Technical Report* for review and comment. We have reviewed the report and are writing to provide additional comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act.

We appreciate that the report was very thorough and detailed. Based upon our review and discussions held in past consulting parties' meetings, we concur that the Area(s) of Potential Effect (APE) illustrated below should be sufficient to take into account the direct and indirect effects of the Long Bridge Project.

We also concur with the lists of Designated and Eligible Historic Properties included within the report and, for purposes of this undertaking, agree with the Preliminary Determinations of Eligibility for properties that are greater than forty-five years of age.

Although it does not appear likely, we note that it may be necessary to slightly modify the APE, the lists of historic properties and/or the preliminary determinations of eligibility if new information comes to light during the consultation process that would warrant such a reevaluation.

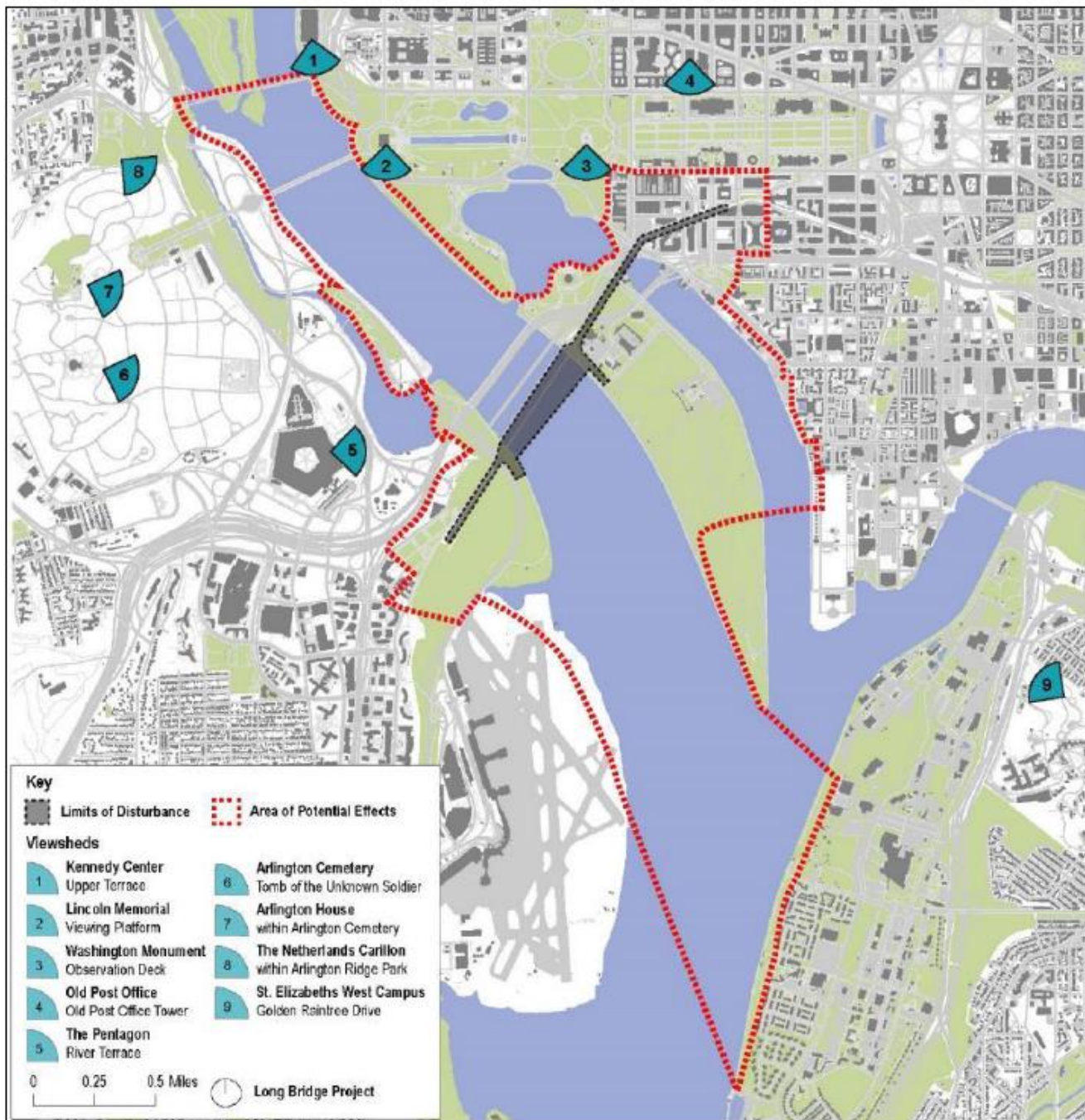
If you should have any questions or comments regarding this matter, please contact me at [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov) or 202-442-8841. Otherwise, we thank you for initiating formal consultation with our office and we look forward to consulting further.

Sincerely,

C. Andrew Lewis  
Senior Historic Preservation Officer  
DC State Historic Preservation Office

17-0051

**AREA OF POTENTIAL EFFECT**







# COMMONWEALTH of VIRGINIA

## Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Matt Strickler  
Secretary of Natural Resources

Julie V. Langan  
Director

Tel: (804) 367-2323  
Fax: (804) 367-2391  
www.dhr.virginia.gov

March 23, 2018

Ms. Laura Shick, Federal Preservation Officer  
Environmental & Corridor Planning Division  
Office of Railroad Policy and Development  
Federal Railroad Administration  
1200 New Jersey Avenue SE  
Mail Stop-20  
Washington, DC 20590

Re: Long Bridge Project  
Arlington County, Virginia  
DHR Project No. 2016-0932  
Received February 23, 2018

Dear Ms. Shick:

Thank you for requesting the comments of the Virginia Department of Historic Resources (DHR) on the document titled *Long Bridge Project Environmental Impact Statement (EIS) Area of Potential Effects and Historic Properties Technical Report*. This letter provides our concurrence with the Federal Highway Administration's definition of the Area of Potential Effects (APE) and identification to date of historic properties for the project. We understand that in future the identification efforts will be expanded to include archaeological resources within the Limits of Disturbance using a phased approach.

We have only one minor technical comment on the document. While Arlington House is discussed and included among the historic properties identified, the APE as it appears on Figure 2-2 (page 8) and again on Figure 3-1 (page 28) does not include Arlington House. The APE as currently drawn has not changed from the draft document provided on November 15. We recommend that the mapping of the APE be revised in the current document to reflect more accurately the APE.

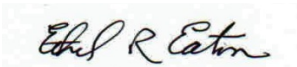
Western Region Office  
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We look forward to continued consultation with the FRA and the other consulting parties as the project progresses. If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me (for archaeology) at (804) 482-6088 or Adrienne Birge-Wilson (for architectural issues) at (804) 482-6092.

Sincerely,



Ethel R. Eaton, Ph.D., Senior Policy Analyst  
Review and Compliance Division

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U.S. Department  
of Transportation

**Federal Railroad  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

July 31, 2018

Kathy B. Anderson  
Chief, Maryland Section Southern  
Baltimore District  
U.S. Army Corps of Engineers  
2 Hopkins Plaza  
Baltimore, Maryland 21201

**Re: Long Bridge Project, National Historic Preservation Act Section 106 Consultation,  
Lead Federal Agency Designation**

Dear Ms. Anderson:

The Federal Railroad Administration (FRA) is conducting consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA) for the Long Bridge Project (the Project). The Project consists of potential improvements to the Long Bridge and related railroad infrastructure between the District of Columbia and Arlington, Virginia. FRA is coordinating the Section 106 process with the preparation of an Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act. The purpose of this letter is to request that your District designate FRA as the lead Federal agency for NHPA Section 106 compliance for the Project.

The Project encompasses the boundaries of both the Baltimore and Norfolk Districts of the U.S. Army Corps of Engineers (USACE). By letter of August 15, 2016, FRA invited both Districts to participate in the EIS process as a Participating or Cooperating Agency. USACE Baltimore confirmed its interest to participate as a Cooperating Agency by letter dated December 9, 2016. USACE Norfolk confirmed its interest to serve as only a Participating Agency. Additionally, in USACE Norfolk's response they designated FRA as the lead Federal agency to fulfill the collective Federal responsibilities under Section 106 of the NHPA per 36 CFR 800.2(a)(2).

In order to provide consistency in consultation amongst USACE districts and consolidate Section 106 compliance under one Federal agency, FRA requests that USACE Baltimore designate FRA as the lead Federal agency responsible for compliance with Section 106 of the NHPA for the Long Bridge Project. Per the request of USACE Norfolk, FRA will include the following clause in any Memorandum of Agreement or Programmatic Agreement developed to resolve adverse effects (if identified) anticipated to result from the Project:

WHEREAS, pursuant to Section 10 and/or Section 404 of the Clean Water Act, a Department of the Army permit will likely be required from the Corps of Engineers for this project, and the Corps has designated FRA as the lead Federal agencies to fulfill Federal responsibilities under Section 106.

FRA requests your response to this request within 30 days of the date on this letter. FRA appreciates your continued participation in the Project. Please direct all correspondence and comments regarding this Project and Section 106 process to Amanda Murphy, FRA Environmental Protection Specialist, at (202) 493-0624 or [amanda.murphy2@dot.gov](mailto:amanda.murphy2@dot.gov).

Sincerely,



Katherine Zeringue  
Federal Preservation Officer  
Environmental & Corridor Planning Division  
Office of Railroad Policy and Development

cc: Steve Harman, USACE  
Amanda Murphy, FRA  
Anna Chamberlain, DDOT

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
STATE HISTORIC PRESERVATION OFFICER



November 8, 2018

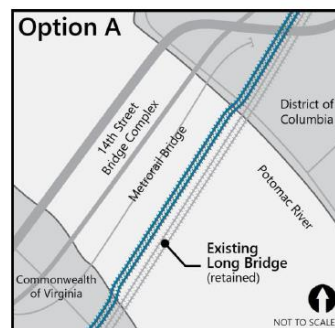
Ms. Amanda Murphy  
Environmental Protection Specialist  
Office of Railroad Policy and Development  
U.S. Department of Transportation  
Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

RE: Assessment of Effects Report for the Long Bridge Project

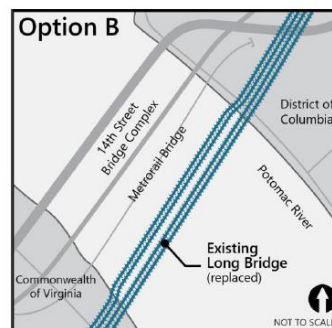
Dear Ms. Murphy:

Thank you for providing the District of Columbia State Historic Preservation Officer (DC SHPO) with a copy of the *Assessment of Effects Report* for review and comment. We have reviewed the document and are writing to provide additional comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act.

We understand that two action alternatives have been retained for further consideration. Alternative A proposes to retain and restore the historic bridge, and to construct a second bridge upstream from the existing structure. Alternative B proposes to replace the historic bridge with two newly constructed bridges in the same general alignment. Both alternatives also include the possibility of constructing a new bike-pedestrian bridge upstream from the new bridge(s) that will either be attached to (Option 1), or independent from the new railroad bridge (Option 2), but a decision regarding whether the bike-pedestrian bridge will be constructed as part of the project has not yet been made.



- New 2-track bridge upstream of existing bridge
- Retain existing bridge



- New 2-track bridge upstream of existing bridge
- Replace existing bridge

Based upon our review of the report and the discussions held during the October 24, 2018 consulting parties' meeting, we concur that implementation of either action alternative will result in adverse effects on historic properties as outlined in the attached table. We also believe that Alternative A will have an indirect visual adverse effect on the East & West Potomac Park Historic District because it will block views to the historic bridge. However, the adverse effects associated with Alternative B will be far greater than those which will occur as a result of Alternative A because the former will completely destroy the historic bridge. For this reason, we recommend that Alternative A be selected as the Preferred Alternative.

Of the two options for the new bike-pedestrian bridge, an independent structure (Option 2) appears to result in fewer adverse effects because it will avoid the need to construct wider piers to accommodate both the new bike-pedestrian bridge and the new railroad bridge. This will allow the new railroad bridge piers to be much more similar in size and design to the historic piers and, therefore, more compatible with the historic context.

On a related note, we recommend that the new railroad bridge be constructed using "Through Plate Girders" (below, left) that match the historic girders rather than "Deck Plate Girders" (below right) that were used to construct the Metro bridge further upstream. Using "Through Plate Girders" will establish a consistent, compatible "vocabulary" for the railroad bridges and differentiate them from the Metro structure. Differences in age and subtle details should eliminate any confusion that the two railroad bridges were constructed simultaneously.



In addition to the minimization measures described above, we recommend that mitigation measures such as interpretive displays that address the existing historic bridge and the extended history of bridges along this alignment be developed and installed within the project area. Supplemental mitigation measures may also be required as we learn more about the proposed project.

If you should have any questions or comments regarding this matter, please contact me at [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov) or 202-442-8841. Otherwise, we look forward to consulting further to develop an appropriate Section 106 agreement document.

Sincerely,



C. Andrew Lewis  
Senior Historic Preservation Officer  
DC State Historic Preservation Office

# Assessment of Effects

## Summary of Adverse Effects Determination



Historic Property	No Action Alternative	Action Alternative A	Action Alternative B	Cumulative Effects	Temporary Effects
National Mall <i>DC</i>	No Adverse Effect	No Adverse Effect	No Adverse Effect	No Adverse Effect	Indirect Adverse Effect
George Washington Memorial Parkway (GWMP) <i>VA/DC</i>	No Adverse Effect	Direct Adverse Effect	Direct and Indirect Adverse Effect	Direct Adverse Effect	Direct and Indirect Adverse Effect
Mount Vernon Memorial Highway (MVMH) <i>VA/DC</i>	No Adverse Effect	Direct Adverse Effect	Direct and Indirect Adverse Effect	Direct Adverse Effect	Direct and Indirect Adverse Effect
East and West Potomac Parks <i>DC</i>	No Adverse Effect	Direct Adverse Effect	Direct Adverse Effect	Direct Adverse Effect	Direct and Indirect Adverse Effect





# COMMONWEALTH of VIRGINIA

## Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Matt Strickler  
Secretary of Natural Resources

Julie V. Langan  
Director

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www.dhr.virginia.gov

November 9, 2018

Ms. Amanda Murphy, Environmental Protection Specialist  
Federal Railroad Administration  
1200 New Jersey Avenue SE, Mail Stop-20  
Washington, DC 20590

Re: Long Bridge Project  
Arlington County, Virginia  
DHR Project No. 2016-0932

Dear Ms. Murphy:

Thank you for requesting comments from the Virginia Department of Historic Resources (DHR) on the materials presented at the Fourth Consulting Parties Meeting held on October 30, 2018.

**Action Alternatives.** DHR recommends the selection of Option 2 for the bike-pedestrian crossing, as the footprint would be smaller than Option 1; it would not as directly impact the historic bridge and would be more easily reversible. We recommend that it be placed upstream. Because Long Bridge is contributing to the East-West Potomac Park, it should be retained and a new two-track bridge should be constructed. Action alternatives may include ground disturbances for piers and/or landings in Virginia and in the District of Columbia. Any necessary further survey should be completed prior to the selection of the preferred alternative.

**Summary for Assessment of Effects.** Regarding summary assessment for Virginia properties, DHR concurs with the following determinations:

Property	No Action Alternative	Action Alternative A	Action Alternative B	Cumulative Effects	Temporary Effects
George Washington Memorial Parkway	No Adverse Effect	Direct Adverse Effect	Direct and Indirect Adverse Effect	Direct Adverse Effect	Direct and Indirect Adverse Effect
Mount Vernon Memorial Highway	No Adverse Effect	Direct Adverse Effect	Direct and Indirect Adverse Effect	Direct Adverse Effect	Direct and Indirect Adverse Effect

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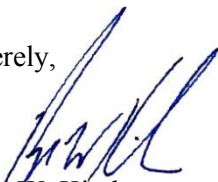
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**Long Bridge Project: Phase IA Archaeological Assessment Draft Technical Report.** We have reviewed the document entitled *Long Bridge Project: Phase IA Archaeological Assessment Draft Technical Report* and find that its recommendations are sound. We support the proposed classification of areas with high, moderate, and no archaeological potential and the Recommended Actions presented in Section 11.5.

This letter provides our concurrence with the FRA's determination of Adverse Effect for all action alternatives as submitted. We look forward to continued consultation with the FRA and the other consulting parties as the project progresses. For any additional questions, please contact the reviewer assigned to this project, Adrienne Birge-Wilson at (804) 482-6092, or via email at [adrienne.birge-wilson@dhr.virginia.gov](mailto:adrienne.birge-wilson@dhr.virginia.gov).

Sincerely,



Roger W. Kirchen  
Director, Review and Compliance Division

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Richmond, VA 23221  
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**DEPARTMENT OF THE ARMY**  
**BALTIMORE DISTRICT, CORPS OF ENGINEERS**  
**ATTN: REGULATORY BRANCH**  
**2 HOPKINS PLAZA**  
**BALTIMORE, MD 21201**

November 15, 2018

Operations Division

U.S. Department of Transportation  
Federal of Railroad Administration (FRA)  
Attention: Ms. Amanda Murphy  
1200 New Jersey Avenue S.E. MS-20  
Washington, D.C. 20590

Dear Ms. Murphy:

This is in reference to your letter dated July 31, 2018, concerning the consultation you are conducting in accordance with Section 106 of the National Historic Preservation Act (NHPA) for the Long Bridge Project (Project). Your letter requests that the Baltimore District designate FRA as the lead Federal agency for NHPA Section 106 compliance. This action is assigned the number CENAB-OPR-M (CSX Transportation/Long Bridge Repairs, DC) 2016-00088.

The Baltimore District stated in our letter dated December 9, 2016, the Corps is a participating and cooperating agency in the preparation of the Environmental Impact Statement (EIS), a copy of which is attached. Accordingly, pursuant to 36 CFR 800.2(a)(2), we authorize the FRA as the lead Federal Agency to fulfill the collective federal responsibilities under Section 106 of the National Historic Preservation Act for the undertaking.

Also, pursuant to 50 CFR 402.07, the Baltimore District also authorizes FRA to conduct Section 7 coordination with the U.S. Fish and Wildlife Service (USFWS) concerning potential effects to Federally-listed threatened and endangered species and pursuant to 50 CFR 600.920(b), to conduct MSA consultation with the National Oceanic and Atmospheric Administration (NOAA) Fisheries concerning the potential effects to Essential Fish Habitat. The FRA would be responsible for completing all coordination pursuant to ESA and MSA. We also recommend that the IPAC determination and any other agency coordination documentation be included in the NEPA document.



If you have any questions concerning this matter, please call Mr. Steven Harman at (410) 962-6082 or [steve.harman@usace.army.mil](mailto:steve.harman@usace.army.mil)

Sincerely,

Kathy B. Anderson  
Chief, Maryland Section Southern

Enclosure

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To identify how we can better serve you, we need your help. Please take the time to fill out our customer service survey at: [http://corpsmapu.usace.army.mil/cm\\_apex/f?p=136:4:0](http://corpsmapu.usace.army.mil/cm_apex/f?p=136:4:0).



**DEPARTMENT OF THE ARMY**  
BALTIMORE DISTRICT, CORPS OF ENGINEERS  
ATTN: REGULATORY BRANCH  
10 S. HOWARD STREET  
BALTIMORE, MD 21201

DEC 09 2016

Operations Division

Ms. Amanda Murphy  
Environmental Protection Specialist  
Office of Railroad Policy and Development  
Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Ms. Murphy:

This is in response to the Federal Railroad Administration (FRA) August 15, 2016, letter requesting participating and cooperating agency status in the preparation of an Environmental Impact Statement in accordance with the National Environmental Policy Act (NEPA) for the proposed improvements to the Long Bridge and related railroad infrastructure in the District of Columbia and Virginia. This action has been assigned the number CENAB-OPR-M (CSX Transportation/Long Bridge Repairs, DC) 2016-00088.

The U.S. Army Corps of Engineers, Baltimore District (Corps) will be a participating and cooperating agency in the preparation of the environmental impact statement (EIS) for the project so that a Corps permit decision can be rendered at the conclusion of the NEPA process. The draft EIS when issued later in the NEPA process, would serve as the Department of the Army Section 404/10 permit application for the project. In this regard, we look forward to working with your agency as the document is developed to ensure that the information presented in the NEPA document is adequate to fulfill the requirements of Corps regulations, the Clean Water Act Section 404(b)(1) Guidelines, and the Corps public interest review process.

The Corps has reviewed and requests that the following topics be comprehensively evaluated in the EA:

1. Purpose and need for the project.
2. Alternatives analysis/Clean Water Act Section 404(b)(1) Guidelines. Based on the project purpose, the Corps will need to concur on the range of alternatives retained for detailed study in the EIS. The alternatives analysis should comprehensively evaluate the following:



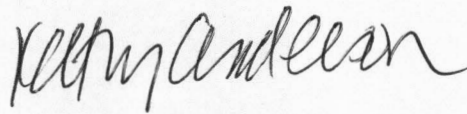
- a. Alternative bridge and railroad improvement designs, locations and alignments.
  - b. Plans for dredging, if necessary, including alternative dredge methods, plan configurations and depths
  - c. Alternative dredge material disposal sites, recycle options, and treatment/reuse alternatives
  - d. A complete description of the criteria used to identify, evaluate, and screen project alternatives
3. Methods to avoid and minimize impacts to waters of the U.S.
- a. Methods to minimize dredging and construction related turbidity
  - b. Methods to minimize adverse effects to water quality
  - c. Methods to minimize adverse effects to natural and cultural resources
  - d. Reduction in project scope
  - e. Reuse/upgrade of existing infrastructure
4. Corps public interest review factors. The decision to issue a permit will be based on an evaluation of the probable impacts, including cumulative impacts, of the proposed activity and its intended use on the public interest. Among the factors that must be evaluated as part of the Corps public interest review include: conservation, economics, aesthetics, general environmental concerns, wetlands and streams, historic and cultural resources, fish and wildlife values, flood hazards, floodplain values, land use, navigation, shore erosion and accretion, recreation, water supply and conservation, energy needs, safety, food and fiber production, mineral needs, water quality, considerations of property ownership, air and noise impacts, and, in general, the needs and welfare of the people. Each of the Corps public interest factors that are relevant to this project must be evaluated comprehensively in the EIS.
5. Delineation of all waters of the U.S., including jurisdictional wetlands, in the project area.
6. Quantify impacts to waters of the U.S. (both temporary and permanent) to all waters of the U.S., including jurisdictional wetlands, for each project alternative. For waterways, include both the linear feet of waterway impacts (measured along the centerline of the waterway) and square feet of impact; for wetlands, include both square foot and acreage impacts; and for temporary wetland impacts, quantify any change in wetland classification (e.g., palustrine forested to palustrine emergent, etc.) and method of work to accomplish this change.
7. Cumulative and indirect impacts resulting from the project.

8. Environmental justice including compliance with the Executive Order 12898 on environmental justice.
9. Describe the disposal options for any excess fill material resulting from construction.
10. Submerged aquatic vegetation, wetland and waterway mitigation plans.
11. Analysis of the project's compliance with Section 7 of the Endangered Species Act, Section 106 of the National Historic Preservation Act, Section 401 of the Clean Water Act, and the Magnuson-Stevens Fishery Conservation and Management Act, as amended by the Sustainable Fisheries Act of 1996 (Public Law 04-267) [essential fish habitat (EFH) assessment].
12. Chemical and physical analysis of the dredge material.
  - a. Based on core samples of the chemical/physical composition of the sediment to be dredged, the method of dredging (e.g., mechanical, hydraulic), and the expected conditions in the waterway (e.g., tides, tidal surge, currents, circulation patterns, etc.), describe the maximum expected turbidity plume and any adverse environmental/water quality impacts, both upstream and downstream, and the expected time duration, resulting from the proposed dredging operation. In addition, describe the plans and methods to contain and/or otherwise minimize the potential detrimental effects of the dredging operation to the aquatic environment. This information will be required for the Essential Fish Habitat (EFH) coordination with the National Marine Fisheries Service (NMFS). We can assist you in preparing the EFH Assessment submission to NFMS.
13. Air quality impacts (i.e., Section 176(c) of the Clean Air Act General Conformity Rule Review).
14. Compliance with the Executive order on floodplains.
15. Address potential conflicts with the construction on shipping traffic and recreational/commercial boating and fishing activities in the Potomac River in the vicinity of the project area.
16. Address potential conflicts with Corps flood protection levees and their proposed improvements along the Potomac River in the vicinity of the project area.

17. Project review schedule and NEPA document preparation schedule.  
Other important milestones (e.g., public hearings, etc.) should be listed in the EIS.

We look forward to working with your agency as the EIS is developed and the review of the project proceeds. A copy of this letter is being sent to the District of Columbia Department of Energy and Environment, the Virginia Department of Environmental Quality and the U.S. Coast Guard. If you have any questions concerning this matter, please contact Mr. Steven Harman at (410) 962-6082.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kathy B. Anderson".

Kathy B. Anderson  
Chief, Maryland Section Southern



### **The Proposed Action**

The Proposed Action consists of improvements to the Long Bridge and related railroad infrastructure located between Virginia Railway Express (VRE) Crystal City Station in Arlington, VA and Control Point (CP) Virginia in Washington, DC.

### **Environmental Impact Statement (EIS) Study Area**

The Long Bridge, constructed in 1904, is a two-track rail bridge located within the Washington Monumental Core. The EIS Study Area (also referred to as the Long Bridge corridor) extends approximately 3.2 miles from the VRE Crystal City Station in Arlington, Virginia to CP Virginia located near 3rd Street, SW in Washington, DC. The Study Area includes federal park land managed by the National Park Service; historic and cultural properties; the Potomac River; offices, hotels, and apartment buildings; transportation facilities (VRE Crystal City Station, VRE L'Enfant Station, Long Bridge, Metrorail right of way and bridge, eleven other railroad bridges, and four roadway bridges); and numerous pedestrian and bicycle trails.

### **Draft Purpose and Need**

The purpose of the Proposed Action is to address reliability and long-term railroad capacity issues in the Long Bridge corridor. The Proposed Action is needed to identify alternatives that would increase capacity to meet projected demand for passenger and freight rail services; improve operational flexibility and resiliency; and provide redundancy for this critical link in the local, regional, and national railroad network. The Proposed Action needs are described in more detail below:

**Railroad Capacity.** Railroad capacity is the ability of the existing Long Bridge corridor to accommodate freight and passenger trains. The existing Long Bridge corridor provides sufficient capacity to support current rail traffic but will fail to meet the combined projected 2040 demands of commuter, intercity passenger, and freight markets.

Based on existing track infrastructure and train scheduling constraints, intercity passenger and commuter services operate at or close to maximum capacity limits within the corridor during the morning peak hour, with eight passenger train movements<sup>1</sup> scheduled in 60 minutes. Over the course of a full weekday, Amtrak and VRE currently operate 24 and 32 trains across the Long Bridge, respectively. CSX Transportation (CSXT) freight trains operate approximately 18 through-freight trains each day on the same tracks used by the two passenger train operations.

Future rail capacity demand in peak periods is forecasted to exceed the current capacity for Long Bridge. The existing track infrastructure, which is limited by the two-track design of the Long Bridge, cannot support the increased demand. According to the Long Bridge Long Range Service Plan prepared in 2016, by 2040, the passenger trains in the morning peak hour are expected to more than nearly double to 17<sup>2</sup>. The six reverse peak commuter trains include four VRE trains originating from Washington Union Station and two MARC run-through trains from Maryland to Alexandria. Over the course of the full day, the number of trains crossing the bridge in 2040 is expected to increase to 44 trains for Amtrak, 92 for VRE, eight for MARC, 42 for CSXT, and six for Norfolk Southern, a major freight carrier that retains legal rights to operate over the bridge but does not

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<sup>1</sup> One Amtrak and six VRE trains in the peak direction and one VRE train in the reverse peak direction.

<sup>2</sup> One Amtrak and nine VRE trains in the peak direction and one Amtrak and six commuter trains in the reverse peak direction.

exercise them today. The projected growth represents an average increase of over 100 percent in traffic on the bridge by 2040.

The removal of other rail capacity bottlenecks east and south of the Long Bridge highlights the need for greater railroad capacity within the wider corridor. These capacity improvement projects include:

- CSXT-funded reconstruction double tracking of the Virginia Avenue Tunnel,
- Doubling of the number of platform edges at L'Enfant Station and Crystal City Station,
- Platform improvements at Alexandria Station, and
- Additional platform edges where only single track access currently exists on the VRE Fredericksburg and Manassas Lines.

Population and employment growth in the Washington Metropolitan Area also will increase the demand for passenger rail travel within the Long Bridge corridor. Population growth and increasing rail ridership in the South, Mid-Atlantic, and Northeast are creating additional demand for intercity rail services that traverse the Long Bridge corridor. The DC to Richmond Southeast High Speed Rail EIS, VRE System Plan 2040, Amtrak Vision for the Northeast Corridor, NEC FUTURE, CSXT National Gateway, Washington Union Station Expansion, and the MARC Growth and Investment Plan all focus upon improving the flow of rail traffic locally across the Long Bridge and along the national rail network.

**Resiliency.** Resiliency of a rail network is the ability to provide operational flexibility and reliability for train services during normal operations, as well as during periods of higher demand and/or unexpected operating conditions. The shared-use infrastructure within the Long Bridge corridor limits the flexibility of commuter, intercity passenger, and freight service to operate efficiently. These conditions create a systemic bottleneck that results in operational conflicts and delays, decreasing reliability and on-time performance of train operations.

The current two-track configuration of the Long Bridge is a physical bottleneck that prevents efficient train flow to the existing three and four track sections located north and south of the Long Bridge. Substantial delays to train intercity service occur in the corridor on a daily basis, particularly between Washington, DC and Alexandria, Virginia. CSXT freight operations are impacted by the current volume of commuter and intercity passenger trains, which limits their ability to operate during peak passenger periods and hinders the flow of their national network. Freight trains are frequently stopped to allow passenger rail service to pass through the corridor, affecting the efficiency and reliability of freight movements. Given projections, the complexity of operations approaching the Long Bridge is expected to increase, creating even more delays and decreased on-time performance.

**Network Connectivity.** The Long Bridge is a major chokepoint, which limits the ability to provide freight service along the eastern seaboard, as well as high-performance passenger rail service between major population centers. This chokepoint limits efficient network connectivity for the rail operators within the Long Bridge corridor, including CSXT, VRE, Amtrak, and potentially MARC, and the overall transportation network. Rail operations are also affected well beyond the limits of the Long Bridge corridor given the extensive reach of freight, commuter, and intercity passenger services along the eastern U.S. and beyond.

The Long Bridge is in a high-volume Class I freight rail corridor. The Long Bridge is the easternmost south to north crossing for Class I freight rail movements and the only freight railroad crossing over the Potomac River between the District and Virginia. The next nearest freight rail crossing over the Potomac River is in Harper's Ferry, West Virginia, approximately 48 miles northwest of the Long Bridge.

The existing bridge is a critical link for intercity passenger rail service between the Northeast Corridor (NEC) and the federally-designated Southeast High Speed Rail Corridor (SEHSR). The existing commuter rail systems (MARC and VRE) both terminate all trains at Washington Union Station, which limits the ability to provide cross-jurisdictional trips for passengers (Virginia to Maryland and vice versa). The existing network forces passengers to complete regional trips via Metrorail, which forces riders to transfer rail systems, potentially leading to travel delays. The Proposed Action could provide the opportunity for alleviating future transfers to Metrorail, which also would allow for increased operational flexibility and system redundancy.

**Redundancy.** Redundancy is the inclusion of additional components that are not necessary for railroad functionality, but are available in the event of a failure of other components. No reasonable detours exist to route rail traffic around the Long Bridge for maintenance or emergencies without extensive service delays.

Due to the close distance between the existing two tracks, both tracks need to be closed during construction or maintenance for safety reasons. Should service across the Long Bridge be interrupted, VRE and Amtrak would not be able to provide train service from Virginia across the Potomac River to L'Enfant Plaza or Washington Union Station, which are the primary destinations for passenger routes. CSXT trains would be redirected to the crossing at Harpers Ferry, thereby substantially increasing service cost and time.



### **The Proposed Action**

The Proposed Action consists of improvements to the Long Bridge and related railroad infrastructure located between Virginia Railway Express (VRE) Crystal City Station in Arlington, VA and Control Point (CP) Virginia in Washington, DC.

### **Environmental Impact Statement (EIS) Study Area**

The Long Bridge, constructed in 1904, is a two-track rail bridge located within the Washington Monumental Core. The EIS Study Area (also referred to as the Long Bridge corridor) extends approximately 3.2 miles from the VRE Crystal City Station in Arlington, Virginia to CP Virginia located near 3rd Street, SW in Washington, DC. The Study Area includes federal park land managed by the National Park Service; historic and cultural properties; the Potomac River; offices, hotels, and apartment buildings; transportation facilities (VRE Crystal City Station, VRE L'Enfant Station, Long Bridge, Metrorail right of way and bridge, eleven other railroad bridges, and four roadway bridges); and numerous pedestrian and bicycle trails.

### **Draft Purpose and Need**

The purpose of the Proposed Action is to address reliability and long-term railroad capacity issues in the Long Bridge corridor. The Proposed Action is needed to identify alternatives that would increase capacity to meet projected demand for passenger and freight rail services; improve operational flexibility and resiliency; and provide redundancy for this critical link in the local, regional, and national railroad network. The Proposed Action needs are described in more detail below:

**Railroad Capacity.** Railroad capacity is the ability of the existing Long Bridge corridor to accommodate freight and passenger trains. The existing Long Bridge corridor provides sufficient capacity to support current rail traffic but will fail to meet the combined projected 2040 demands of commuter, intercity passenger, and freight markets.

Based on existing track infrastructure and train scheduling constraints, intercity passenger and commuter services operate at or close to maximum capacity limits within the corridor during the morning peak hour, with eight passenger train movements<sup>1</sup> scheduled in 60 minutes. Over the course of a full weekday, Amtrak and VRE currently operate 24 and 32 trains across the Long Bridge, respectively. CSX Transportation (CSXT) freight trains operate approximately 18 through-freight trains each day on the same tracks used by the two passenger train operations.

Future rail capacity demand in peak periods is forecasted to exceed the current capacity for Long Bridge. The existing track infrastructure, which is limited by the two-track design of the Long Bridge, cannot support the increased demand. According to the Long Bridge Long Range Service Plan prepared in 2016, by 2040, the passenger trains in the morning peak hour are expected to more than nearly double to 17<sup>2</sup>. The six reverse peak commuter trains include four VRE trains originating from Washington Union Station and two MARC run-through trains from Maryland to Alexandria. Over the course of the full day, the number of trains crossing the bridge in 2040 is expected to increase to 44 trains for Amtrak, 92 for VRE, eight for MARC, 42 for CSXT, and six for Norfolk Southern, a major freight carrier that retains legal rights to operate over the bridge but does not

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<sup>1</sup> One Amtrak and six VRE trains in the peak direction and one VRE train in the reverse peak direction.

<sup>2</sup> One Amtrak and nine VRE trains in the peak direction and one Amtrak and six commuter trains in the reverse peak direction.

exercise them today. The projected growth represents an average increase of over 100 percent in traffic on the bridge by 2040.

The removal of other rail capacity bottlenecks east and south of the Long Bridge highlights the need for greater railroad capacity within the wider corridor. These capacity improvement projects include:

- CSXT-funded reconstruction double tracking of the Virginia Avenue Tunnel,
- Doubling of the number of platform edges at L'Enfant Station and Crystal City Station,
- Platform improvements at Alexandria Station, and
- Additional platform edges where only single track access currently exists on the VRE Fredericksburg and Manassas Lines.

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Preserving America's Heritage

December 21, 2018

Ms. Amanda Murphy  
Environmental Protection Specialist  
Federal Railroad Administration  
1200 New Jersey Avenue SE  
Washington, DC 20590

Ref: *Proposed Long Bridge Project*  
*Arlington, Virginia and Washington, District of Columbia*  
*ACHPConnect Log Number: 13480*

Dear Ms. Murphy:

The Advisory Council on Historic Preservation (ACHP) has received your notification and supporting documentation regarding the adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO), affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and it is determined that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR §800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the Virginia and Washington, DC State Historic Preservation Officer's (SHPO's), and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the MOA, and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with the notification of adverse effect. If you have any questions or require further assistance, please contact Sarah Stokely at (202) 517-0224 or by email at [sstokely@achp.gov](mailto:sstokely@achp.gov).

Sincerely,

LaShavio Johnson  
Historic Preservation Technician  
Office of Federal Agency Programs

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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