

Appendix D4:

Responses to Other Organization Comments

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Alexandria BPAC			
1A	We hope that the final Environmental Impact Statement will consider suggestions for improving the proposed pedestrian and bicycle bridge such as increasing platform size to accommodate a wider variety of bikes. The platforms on the ramp between the Mount Vernon Trail and the bridge are not wide enough to adequately accommodate all trail users such as those riding cargo bikes or tandem bikes, or pulling bike trailers or trail-a-bikes.	During final design, Virginia Department of Rail and Public Transportation (DRPT) would explore options for bike-pedestrian bridge design that balances the needs of all users with other factors, such as safety, cost, and impacts to National Park Service (NPS) property.	Final Environmental Impact Statement (FEIS)/Record of Decision (ROD), Section 2.3, Measures to Minimize Harm Commitment/Mitigation ID: B39
1B	The pedestrian and bicycle bridge should be built at the same time as the rail bridge to reduce the amount of time that the Mount Vernon Trail will be impacted.	During final design, DRPT would continue to pursue opportunities to minimize additional impacts from construction of the bike-pedestrian crossing, including options for constructing elements of the bike-pedestrian crossing concurrently with the railroad bridge.	FEIS/ROD, Section 2.3, Measures to Minimize Harm Commitment/Mitigation ID: B85
1C	The project should include construction of the Gravelly Point bypass which is currently in the National Park Service's Paved Trails Plan. This bypass would help mitigate the risks associated with increased trail traffic.	While it is possible the new bike-pedestrian crossing would increase traffic on the Mount Vernon Trail (MVT), it could also alleviate traffic by providing an alternate connection between the District and Crystal City. In addition, the bike-pedestrian crossing itself is significant mitigation for impacts to the George Washington Memorial Parkway (GWMP) and MVT. Therefore, additional mitigation is not appropriate.	n/a
1D	The bridge should incorporate railing design that does not reduce the effective bridge width, which occurs when users avoid proximity to a vertical barrier.	See response to Comment 1A .	FEIS/ROD, Section 2.3, Measures to Minimize Harm Commitment/Mitigation ID: B39

ID	Comment	Response	Reference
Audubon Naturalist Society			
2A	Restore impacted areas to a higher ecological function than were previously, when possible ANS understands that projects like this will come with environmental impacts. However, this project also has the opportunity to plan for restoration of impacted areas with an eye towards enhancing the impacted property over what currently exists today. For example, the staging areas in the clover leaves should be restored with native trees, with a plan to sustain them for up to a year following the replanting, with regular watering and invasive plant controls. A restoration approach should be considered for all environmentally impacted areas.	DRPT would minimize impacts to the extent practicable. Where impacts are unavoidable, DRPT would restore areas to their pre-construction function and appearance, either through reseeding or replanting of woody vegetation using native species. DRPT would reestablish terrestrial vegetation removed for construction activities where possible and in coordination with any reforestation requirements. DRPT would maintain trees and vegetation for 3-5 years following planting.	FEIS/ROD, Section 2.3, Measures to Minimize Harm Commitment/Mitigation ID: B08
Committee of 100			
3A	<p>We hope that the new two-track bridge being proposed to link the District with Virginia will eliminate the current bottleneck and provide for separating passenger and freight traffic as the Committee has requested before. However, we are surprised and disappointed by the significant errors that confuse the track spacing in the Maryland Avenue SW Corridor by showing it at 13 feet in some tables and diagrams, and 14 feet in the text and other diagrams. Detailed examples are presented below.</p> <p>The potential solution as described for the design restrictions of the Maryland Avenue SW Corridor will enable four tracks to be installed. Their construction, along with improvements proposed for the L'Enfant Plaza VRE Commuter Rail Station (under a separate project), offers the opportunity to significantly improve commuter rail service through the corridor. But the confusion in the document, 13-foot track centers or 14-foot, raises other questions about what else may be wrong.</p>	<p>The inconsistencies noted are between the Draft EIS (DEIS) and Appendix B5, Maryland Avenue SW to L'Enfant Interlocking Clearance Assessment. The appendix was missing a cover sheet, which has since been inserted, explaining the purpose of the report and subsequent decisions.</p> <p>Specifically, the purpose of the report, finalized in September 2018, was to provide an assessment of the existing and proposed horizontal alignment within this segment of the project to determine the feasibility of various four-track alignment options between the north end of Maine Avenue and L'Enfant Interlocking. Of the options assessed, the report recommended proceeding with Option 2, which would have 13-foot track spacing and a minimum of 8.5-foot horizontal clearances. After reviewing the report, CSXT stated that they would be more likely to accept an option with 14-foot track centers and 7.5-foot minimum lateral clearance.</p>	FEIS/ROD Section 1.4, DEIS Errata and Other Changes Errata ID: 190
3B	However, there are errors in the presentation. Initially, CSXT requested their minimum 15-foot track spacing design	Therefore, FRA and DDOT developed conceptual engineering plans for the Action Alternatives with the	

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	<p>standard be maintained for freight tracks. However, CSXT, Amtrak, VRE, and DRPT all requested the analysis to evaluate 13-foot spacing for passenger trains. As stated on page 3-28 and later on page 18-9, CSXT and operators Amtrak, VRE, and DRPT have agreed to accept 14-foot track centers. But examining the plans and tables of Appendix B5 (Clearance Assessment), track centers of 13 feet with a minimum of 8.5 feet lateral clearance are given as the preferred design. This will fit four tracks underneath Maryland Avenue, between the existing buildings and retaining walls with minimal or no significant obstacles. These dimensions have been identified as the minimum acceptable geometry by current operators. Support letters have been received from Amtrak, VRE, and DRPT, which are included in the appendix, but only one, VRE, specifically supports the 8.5-foot lateral clearance. Additional inconsistencies are found in other chapters, such as page 9-31 that states 14-foot track centers. Then Appendix B6 shows 14-foot centers as well on the conceptual engineering plans.</p>	<p>requested spacing, and these plans were used for the analysis of impacts in the DEIS. The appendix contains the original analysis, and therefore discusses 13-foot track centers with 8.5-foot minimum lateral clearance, rather than the 14-foot track centers and 7.5-foot minimum lateral clearance shown in the conceptual engineering plans and used for analysis in the DEIS.</p>	
3C	<p>There are no letters of support from MARC and NS. Although not listed, the Committee assumes that MARC and NS have been involved in these discussions. They should be added to the list of stakeholders involved.</p>	<p>MARC and NS have been invited to participate in the Long Bridge Project, but to date have not accepted the invitation. MARC does not currently have operating rights on Long Bridge or in the corridor. While Norfolk Southern does have operating rights (which they do not currently use), CSXT's clearance requirements would govern for all freight traffic.</p>	n/a
3D	<p>The track spacing in the Maryland Avenue SW Corridor needs to be clarified – will it be 14-foot track centers or 13-foot track centers? What will be the lateral clearances? How will the 14-foot track centers impact the estimated costs for structural improvements in the Maryland Avenue Corridor as shown in Table 1-1 for Option 2, with 13-foot track centers? Option 2 is the preferred option to minimize structural improvement costs. As the DEIS states, proceeding with any option other than Option 2 presents a significant risk to public financing for</p>	<p>See response to Comments 3A and 3B above.</p>	n/a

ID	Comment	Response	Reference
	the project. How will 14-foot track centers impact this financing?		
3E	Cross Section A-A of Figure 3-12, page 3-24, illustrates the required lowering of the tracks through the Maryland Avenue SW Corridor to provide the increased overhead clearances needed for freight and passenger service. Later, on page 3-27 (line 450) it states that the preliminary design should not preclude future electrification along passenger tracks. So, will the tracks in the Maryland Avenue SW Corridor be lowered to the depth needed so that future electrification can be installed? Or will that additional excavation wait until there is a funded plan for electrifying the passenger route to Richmond? Future electrification is discussed in Appendix B2, Structures Study Report, Section 7.2 Future Electrification, but no details regarding Maryland Avenue SW are given.	Any future electrification in this location would use the lowest profile equipment available at the time. Based on industry trends, it is expected that the required clearance would be lower than required for current equipment. However, some lowering of the track may be needed depending on equipment used.	n/a
3F	Also, Appendix B2, Sections 7.1 Bike-Pedestrian Crossing and 7.2 are discussed on page 27, not page 28 as shown in the Table of Contents.	Table of contents for Appendix B4 has been updated (Appendix B4 is the correct reference).	FEIS/ROD Section 1.4, DEIS Errata and Other Changes Errata ID: 189
3G	Although not a part of the Long Bridge Project, the importance of coordinating the adjacent L’Enfant Plaza VRE Station improvements with the construction of the four tracks and establishing a direct connection to the L’Enfant Plaza Metro station below (with its five routes – Orange, Blue, Silver, Green and Yellow) cannot be stressed enough. This will make a joint L’Enfant Plaza VRE/Metro station a major transportation hub in SW DC.	The VRE L’Enfant Plaza Station Improvements Project and the Long Bridge Project are separate projects, and therefore any connection between VRE and Metrorail is outside the scope of the Long Bridge Project.	n/a
3H	At the Public Meeting on October 22, Committee members discussed with DDOT staff details about the safety of the Maryland Avenue SW Corridor. One question concerned the DC Department of Energy and the Environment (DOEE) and whether they had been involved since that office is responsible for investigative and surveillance activities related	DDOT has coordinated with the DOEE Rail Safety and Emergency Response Division. As stated by DOEE, the Long Bridge Project is under the purview of FRA. The District’s Rail Safety Act is guided by several pieces of Federal legislation. Section 108c(c), cited in the comment, refers to railroad safety activities within FRA’s	n/a

ID	Comment	Response	Reference
	<p>to the safety of facilities, equipment, rolling stock, and operations of railroads and railroad carriers operating in the District.</p> <p>DC Law 21-254. Rail Safety and Security Amendment Act of 2016, Section 108c (c) states: "The Director may engage in investigative and surveillance activities related to the safety of facilities, equipment, rolling stock, and operations of railroads and railroad carriers operating in the District and may take enforcement actions, to the extent permissible under 49 U.S.C. § 20101 et seq.), or any regulation issued thereunder,"</p> <p>The Virginia DRPT is an active participant, but there is no description of DOEE’s participation in evaluating the safety of what is being proposed. We were assured that DOEE staff had attended several meetings, and DOEE is listed as a Participating Agency in Table 25-2. What comments or input did they have when reviewing the safety of what is being proposed?</p>	<p>purview. Under 49 CFR 212, State Participation Regulations (FRA), the District is given the authority to inspect and enforce existing railroads within the District once certified. DOEE has not yet been certified. In addition, this authority applies to safety of existing railroads. As stated in 49 CFR 212.01(d), “The principal role of the State Safety Participation Program in the national railroad safety effort is to provide an enhanced investigative and surveillance capability through assumption, by participating State agencies, of responsibility for planned routine compliance inspections.”</p> <p>49 CFR 674, State Safety Oversight (FTA), does empower the District to perform surveillance, inspection, and enforcement duties which would begin in the pre-engineering stages on any new start or augmentation of existing infrastructure. This only applies to rail fixed guideway public transportation systems located solely within the District. As noted in 49 CFR 674.7, “Rail fixed guideway public transportation system means any fixed guideway system that uses rail, is operated for public transportation, is within the jurisdiction of a State, and is not subject to the jurisdiction of the Federal Railroad Administration, or any such system in engineering or construction.” Given the Long Bridge Corridor is an FRA-regulated facility, this rule does not apply.</p>	
31	<p>The Committee has raised questions in the past as to the accuracy of the 2040 train volume estimates. It appears that the latest projections reflect the most up to date data available from all railroads involved. As passenger demand and freight traffic grow, the train volumes for all rail users will eventually reach the projected 2040 volumes as presented in</p>	<p>As part of Phase II of the Long Bridge Project, operations simulation modeling was conducted to determine which Long Bridge Corridor future infrastructure scenario would produce the best operational results given future service growth and other changes in rail operations. Out of the scenarios tested, the future build scenario with four tracks would match the future capacity of the</p>	n/a

ID	Comment	Response	Reference
	various tables. Have any estimates been made as to what the actual capacity of the 4-track Long Bridge will be?	planned four track rail line north and south of the project and was best able to handle the demands of future freight and passenger service levels. This scenario produced results that were operationally superior to the two-track and three-track scenarios.	
3J	Although not required for the Long Bridge Project, the pedestrian and bicycle bridge examined as mitigation for loss of parkland presents an opportunity to provide an important connection within the regional trail system, linking Crystal City and the District. As explained in the Executive Summary, the bridge would connect Long Bridge Park with NPS Parking Lot C in East Potomac Park. Ramps would connect the crossing with a path just north of the new Long Bridge Park Aquatic Center, the Mount Vernon Trail, and East Potomac Park. The Committee hopes that the design effort will examine additional connections to bicycle paths in the District and Virginia, such as to Washington Marina or the Mandarin Oriental Hotel pedestrian bridge to improve capacity and safety for bicyclists and pedestrians alike.	As described in DEIS Chapter 22, Bike-Pedestrian Crossing, Lines 298-301, there is not sufficient space between the railroad corridor and US 1 to directly connect the bike-pedestrian crossing over the Washington Channel to the Washington Marina or the Mandarin Oriental Hotel. There are other potential paths through East Potomac Park and across the Washington Channel, but these would need to be pursued as part of separate projects.	DEIS Chapter 22, Lines 298-301
3K	<p>The Executive Summary, on page 26, states that noise and vibration levels will increase under the preferred alternative as more trains begin operations. For example, increased noise levels are expected to exceed FRA severe noise criteria at the Portals V Residences, the Mandarin Oriental Hotel and parts of Long Bridge Park. Noise would also exceed FRA moderate noise criteria in other parts of Long Bridge Park.</p> <p>The only reference to vibration impacts occurs when construction activities are discussed, but no mention of increased vibrations due to the increase in train traffic is mentioned for any location. However, Appendix D1: Methodology Report, Section 11, Noise and Vibration, explains the need for noise and vibration studies for both construction monitoring and train vibrations. These details should be</p>	Vibration measurements were taken as part of the analysis and are described in detail in Appendix D2, Affected Environment Report. The vibration analysis is described in Appendix D3, Environmental Consequences Report and Chapter 13, Noise and Vibration. The analysis concluded that there would be no permanent vibration impacts. In order to focus the Executive Summary on "key impacts," the lack of permanent vibration impacts was not discussed. The lack of construction vibration was discussed in the executive summary because several stakeholders had raised the concern.	DEIS Chapter 13, Noise and Vibration; DEIS Appendix D2, Affected Environment Report; DEIS Appendix D3, Environmental Consequences Report

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	added to the Executive Summary. Before construction begins, vibration data from train operations should be recorded to enable appropriate before/after studies to be conducted.		
Crystal City Civic Association			
4A	We understand that the 1.8 mile Long Bridge Project is a project in itself, but it also is a piece of a multi-project initiative called DC2RVA. It is not clear to us whether and/or how the increments of all of the various projects are added together.	The Long Bridge Project and the DC2RVA Project are separate projects with independent utility (meaning that each project is usable and has a purpose even if other transportation investments are not made). For the Long Bridge Project EIS, impacts of the two projects when considered together are addressed in DEIS Chapter 21, Cumulative Impacts. The projects would tie together at the RO Interlocking near Long Bridge Park. Because planning for both projects is advancing in a similar timeframe, the project teams have coordinated their designs at the interlocking.	DEIS Chapter 21, Cumulative Impacts
4B	For example, the draft EIS states that Long Bridge Project assessments are made for trains going 90 MPH or less. However, DC2RVA is designed to be for trains traveling at higher MPHs. If speed of trains has any influence on the assessment subjects, it would be useful to indicate what they might be.	The maximum design speed for trains for the DC2RVA project between RO Interlocking and Alexandria is 90 miles per hour. The maximum design speed for the Long Bridge Project is generally lower because of the constrained right-of-way in the corridor necessitating tighter curves and therefore lower speeds.	n/a
4C	We are particularly interested in the assessments being made on increments because residents live not far from the south end of the LBP and also are directly affected by the VRE Crystal City Station project. The VRE project begins where the LBP project ends. Taken together, the two projects have impacts extending the length of Crystal City, and include, for example, the curve on Crystal Drive where wheel screech and other noise is a problem. We would like to understand the impact of the two projects taken together and how mitigation during construction and subsequent operations applies to the two.	The Long Bridge Project and the VRE Crystal City Station Project are separate projects with independent utility, as explained in Comment 4A in regard to the DC2RVA Project. For the Long Bridge Project EIS, impacts of the two projects when considered together are addressed in DEIS Chapter 21, Cumulative Impacts.	DEIS Chapter 21, Cumulative Impacts

ID	Comment	Response	Reference
4D	<p>We would also like to express our concerns about the proposed “Temporary Land Use and Impact” on Crystal City at the southern end of Long Bridge Park. The EIS states in chapter 12, line 98, that “The southernmost part of the Local Study Area includes private commercial, residential, and mixed uses in the Crystal City area.” It further states in lines 355-356 that “Open space at the south end of Long Bridge Park (negligible adverse direct impact, as park uses would remain undisturbed).” However, Figure 12-12 “Temporary Land Use and Property Impacts – Crystal City” clearly shows that the area of temporary impact would include the entrance to Long Bridge Park at 12th Street and Crystal Drive that belongs to Arlington County, as well as the small park belonging to JBG Smith that borders several residential buildings. This is a lovely, calm area used extensively by local residents as well as by visitors to Long Bridge Park.</p> <p>It is unclear from the EIS what this “temporary impact” might be. However, if it becomes an active staging area for construction, it would greatly impact residents and visitors to the Park and quickly become a negative issue for all concerned. We agree with the Friends of Long Bridge Park that this would not be an acceptable use of this space. We hope that you will identify and utilize an alternative staging location that does not affect public space in Crystal City.</p>	<p>The access to the railroad corridor at the northern end of Crystal Drive (see DEIS Chapter 12, Figure 12-12) would use private property owned by JBG Smith. This area would be used for to allow crews to lift equipment and materials from delivery trailers into the railroad for construction. There would be no storage of construction materials in this area. Access to Long Bridge Park would not be affected.</p> <p>Lines 355-356 revised to read “Privately-owned publicly accessible open space at the northern end of Crystal Drive, south of the entrance to Long Bridge Park (negligible adverse direct impact, as park uses would remain undisturbed).”</p>	<p>DEIS Chapter 12, Land Use and Property, Figure 12-12</p> <p>FEIS/ROD Section 1.4, DEIS Errata and Other Changes</p> <p>Errata ID: 71</p>
4E	<p>However, the areas considered for assessments of “noise” and “public health” are different. No residential buildings are included in the noise assessment. In the public health section, the study area includes 4 residential buildings that are close to the southern end of the project site. The EIS describes noise in terms of degrees of “annoyance.” However, science increasingly indicates that noise pollution can create both physical and mental health problems. Given the proximity of the noise study area to the public health area, it appears likely</p>	<p>The Local Study Area for noise and vibration extends up to 750 feet from the railroad right-of-way, which is a standard study area for noise analysis. The Local Study Area for public health encompasses a much wider area (0.5 miles) because it includes a broader range of factors where impacts may be felt farther away from the proposed infrastructure changes.</p>	<p>FEIS/ROD Section 1.4, DEIS Errata and Other Changes</p> <p>Errata ID: 147</p>

ID	Comment	Response	Reference
	that more-than-minor adverse effects could affect residents, not just potential visitors to Long Bridge Park.	As it relates to public health, thresholds for noise are based on the risk of noise-induced hearing loss. This risk is based on prolonged exposure to a time-weighted average (TWA) noise exposure of 85 A-weighted decibels (dBA) or greater over 8 hours.	
4F	The EIS inclusion of possible noise mitigations, including but not limited to, at least two available rail systems that dampen noise is encouraging and useful. Especially because a large increase of the number of residents in Crystal City is expected from recently completed and planned residential units, we hope these and other possible mitigations will be put in place.	Comment noted. As project design advances, DRPT would continue to evaluate the potential to minimize noise impacts to the extent practicable.	FEIS/ROD, Section 2.3, Measures to Minimize Harm Commitment/Mitigation ID: A16; B64; B66; B67
Friends of Long Bridge Park			
5A	First, we do not support a particular part of the EIS proposal. In Chapter 12, lines 355-356 propose using the south part of Long Bridge Park for construction activities. This is NOT an acceptable use of the space. This part of Crystal City is in the CIP for Arlington County for park development and this would prevent any development of the park. In addition, it would prevent usage of elements of the park, hinder entrance to the park and be an eyesore.	See response to Comment 4D .	DEIS Chapter 12, Land Use and Property, Figure 12-12 FEIS/ROD Section 1.4, DEIS Errata and Other Changes Errata ID: 71
5B	Second, in lines 359-360 there is also usage of the park for construction. It is not clear if this is for the actual railroad bridge or the Pedestrian Bridge. Clearly to connect Long Bridge Park to the Pedestrian Bridge requires work in Long Bridge Park and we approve of such actions. If the plan is to use part of the park for other purposes, then we would want additional information.	Lines 359-360 refer to construction of the railroad bridge. Impacts from construction of the bike-pedestrian crossing are addressed in DEIS Chapter 22, Bike-Pedestrian Crossing . These impacts are described in more detail in DEIS Chapter 3, Alternatives, lines 620-625 . While it is not possible to avoid these impacts entirely, the commitments made in FEIS/ROD Section 2.3, Measures to Minimize Harm include mitigation measures, as well as commitments to coordination and design processes intended to ensure opportunities to avoid, minimize, and mitigate impacts of the Preferred Alternate are considered and incorporated into the Project as the design process continues.	DEIS Chapter 3, Alternatives, Lines 620-625 FEIS/ROD, Section 2.3, Measures to Minimize Harm

ID	Comment	Response	Reference
5C	Third, Taking of land at the North End of the park (285-289 Chapter 12) is also not recommended. We understand the amount of land is small, but still there may be legal problems and we dislike any parkland permanently changed to Railroad right of way. This decreases the amount of parkland in the area and is not recommended.	The Project Team has endeavored to minimize impacts to park property to the extent practicable. In addition, impacts to Long Bridge Park were considered in the Section 4(f) Evaluation and FRA determined that there is no prudent and feasible alternative that would avoid impacts to the park.	DEIS Chapter 12, Lines 180-183 Appendix A, Final Section 4(f) Evaluation, Section 4.0, Avoidance Alternatives Analysis
Friends of the Mount Vernon Trail			
6A	1.The pedestrian and bike bridge should be built concurrently to reduce prolonged construction on the trail and provide a more timely mitigation.	During final design, DRPT would continue to pursue opportunities to minimize additional impacts from construction of the bike-pedestrian crossing, including options for constructing elements of the bike-pedestrian crossing concurrently with the railroad bridge.	FEIS/ROD, Section 2.3, Measures to Minimize Harm Commitment/Mitigation ID: B85
6B	2.The bridge should made be as wide as possible and consideration should given to installing railing that does limit the effective width of the bridge. Bicycle uses tend to stay two feet away from vertical structures, which can remove four feet of effective width from a bridge. 3.The platforms on the switchbacks between the trail should be enlarged to ensure accessibility for all trail users including children, wheel chairs, cargo bikes and tandem bikes.	During final design, DRPT would explore options for bike-pedestrian bridge design that balances the needs of all users with other factors, such as safety, cost, and impacts to NPS property.	FEIS/ROD, Section 2.3, Measures to Minimize Harm Commitment/Mitigation ID: B39
6D	4.The trail in the construction area will likely be damaged by construction. As part of the mitigation, the section of trail from Gravelly Point to the 14th Street Bridge should be resurfaced.	Following construction, DRPT would restore the trail to existing or better condition. Therefore, additional mitigation would not be needed.	FEIS/ROD, Section 2.3, Measures to Minimize Harm Commitment/Mitigation ID: B40

ID	Comment	Response	Reference
National Ferry Corporation			
7A	<p>Our company, National Ferry Corporation (“NFC”), operates a waterborne sightseeing business from the Washington Marina. Marina management recently notified me of the subject DDOT Long Bridge Project (the Project) and informed me that public comments concerning the Project can be submitted to your office through today. Of concern is that the Project currently incorporates a prospective plan to take over our contracted parking lot within the Washington Marina for the duration of the project. That parking lot is home to our ticket booth and our customer and staff parking, and is the secure access point to our docks and vessels. I have included an excerpt from your Project Chapter 12, Land Use and Property Section, which highlights the lot planned for closure. That excerpt provides a clear visual demonstrating that our entire operation would be crippled by a take-over of that lot by DDOT.</p> <p>NFC has been a faithful tenant of The Washington Marina Company since 2015 when we first contracted with the marina for three commercial docks. That Agreement also provides for the housing of our ticket booth and parking for our crew at the marina’s west parking lot. The Agreement also provided that we could offer necessary customer parking for our public cruises and charters. Over the past 5 years, NFC has provided a safe and memorable cruise experience from The Washington Marina to over 500,000 passengers and provided jobs and career training to 100 past and present employees. The lot closure would mean the end to our company and the loss of jobs for local residents, and we beg you to reconsider and modify your plan for staging your vehicles for the project.</p>	<p>FRA and DDOT appreciate the importance of the parking lot at the Washington Marina to the operation of its business and other businesses that operate from that location. In Chapter 17, Social and Economic Resources, the DEIS acknowledges that impacts to parking at the marina could result in loss of patrons (see lines 431-435). The section has been revised to indicate that this would impact other businesses operating from the Washington Marina.</p> <p>DRPT would continue to work to minimize adverse effects as the Project advances through more detailed design. For unavoidable impacts, the commitments made in FEIS/ROD Section 2.3, Measures to Minimize Harm include coordination with Washington Marina to determine appropriate mitigation for the acreage where the parking lot is located.</p>	<p>FEIS/ROD Section 1.4, DEIS Errata and Other Changes</p> <p>Errata ID: 139, 140, 145, 146</p> <p>FEIS/ROD, Section 2.3, Measures to Minimize Harm</p> <p>Commitment/Mitigation ID: A10</p>

ID	Comment	Response	Reference
Southern Environmental Law Center			
8A	Despite the multiple benefits of the proposed project, Long Bridge is located in an area with significant environmental, historic, and community resources. Although the current Preferred Alternative will result in fewer impacts than the other Build Alternatives that have been studied, it is imperative that opportunities to further avoid and minimize impacts to these resources are carefully considered and incorporated into the project as the design process continues.	The commitments made in Section 2.3, Measures to Minimize Harm include mitigation measures, as well as commitments to coordination and design processes intended to ensure opportunities to avoid, minimize, and mitigate impacts of the Preferred Alternative are considered and incorporated into the Project as the design process continues.	FEIS/ROD, Section 2.3, Measures to Minimize Harm
8B	In addition, given the project's location along the Potomac River, we believe the DEIS's analysis of potential climate change-related impacts on the project and its surroundings should be strengthened. Analysis of the potential vulnerability and resiliency of the project to climate impacts is crucial to help ensure that Long Bridge will remain a viable transportation link well into the future.	<p>The Project crosses the FEMA-designated 100-year floodplain. In addition, several points in the corridor cross the 500-year floodplain. As noted in DEIS Chapter 6, Water Resources and Water Quality (lines 488-497), the Project is expected to have negligible impacts to the elevation or extent of the floodplain. As noted in the FEIS/ROD Section 2.6.7, Floodplains Finding, the likely future damage from flooding would not be substantial in cost or extent, including interruption of service on or loss of a vital transportation facility, because the railroad tracks in would be located on bridges and embankments above the 100-year and 500-year flood levels.</p> <p>Language has been added to Chapter 9, Transportation and Navigation, that addresses the likely impacts of climate change to railroad infrastructure and operations. Risks due to climate change would include:</p> <ul style="list-style-type: none"> • Increased risk of heat exposure and heat-related illness to outdoor workers; • Increased risk of buckling along the railroad tracks; • Increased likelihood of soil slumping and slope failure along embankments due to increased precipitation; and 	<p>DEIS Chapter 6, Water Resources and Water Quality, Lines 488-497</p> <p>FEIS/ROD Section 2.6.7, Floodplains Finding</p> <p>FEIS/ROD Section 1.4, DEIS Errata and Other Changes</p> <p>Errata ID: 31</p>

ID	Comment	Response	Reference
		<ul style="list-style-type: none"> Increased risk of damage and service delays due to fallen trees and debris from high wind, ice storms, and other severe storm events. <p>The Project would not experience increased risk of damage or service delays due to flooding, as the railroad bridges and embankments are located above the floodplain, even with anticipated sea level rise.</p>	
8C	<p>Although we were pleased to see that the DEIS addresses some GHG emissions that will result from the project, the analysis lacks an examination of the project’s anticipated benefits in reducing GHG emissions by encouraging drivers to shift from highway use to take advantage of new passenger and freight rail services. These benefits can be further increased by designing the project so that it can easily accommodate, or be retrofitted to accommodate, future electrification of rail lines. The final EIS should include further analysis of this option, including preliminary cost estimates.</p>	<p>Potential greenhouse gas emissions due to mode shift from auto to rail is likely to be relatively minor at a regional scale. For example, the reduction in CO₂ emissions due to the DC2RVA project is estimated to be approximately 6,000 tons per year in 2045 for the entire corridor between Northern Virginia and Richmond (DC2RVA FEIS, Table 5.6-3). In addition, a number of other factors would likely affect greenhouse gas emissions by 2040, including changes in land use affecting auto mode share and increasing adoption of hybrid and electric vehicles. Therefore, FRA determined that quantifying any change due to mode shift would be not practicable and overly speculative, in accordance with CEQ’s <i>Draft National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions</i> (84 FR 30097). A qualitative statement has been added to Chapter 10, Air Quality and Greenhouse Gases.</p> <p>The Long Bridge Project has been designed so as not to preclude electrification. As future electrification would include a number of investments, including new rolling stock, it would need to be down in coordination with CSXT, the corridor owner, and the corridor operators. At this time there are no plans to electrify the corridor. Therefore, the potential costs and benefits of</p>	<p>FEIS/ROD Section 1.4, DEIS Errata and Other Changes</p> <p>Errata ID: 52</p>

ID	Comment	Response	Reference
		electrification were not considered as part of the Project.	
8D	We also appreciate that the Preferred Alternative has been located and designed to minimize impacts to the significant resources in the vicinity of the project, such as Roaches Run Waterfowl Sanctuary, Long Bridge Park, East Potomac Park, and the George Washington Memorial Parkway. As this project moves forward, we encourage you to carefully consider further design changes and mitigation options to minimize any remaining impacts on these and other resources in the project area as part of the DEIS process and related historic and cultural resource reviews.	The commitments made in Section 2.3, Measures to Minimize Harm include mitigation measures, as well as commitments to coordination and design processes intended to ensure opportunities to avoid, minimize, and mitigate impacts of the Preferred Alternate are considered and incorporated into the Project as the design process continues.	FEIS/ROD, Section 2.3, Measures to Minimize Harm
8E	Given this project's location crossing the Potomac River, it is important that the Preferred Alternative be designed to ensure resiliency in the face of future climate change impacts. The project area falls largely within existing floodplains and in an area of the Potomac subject to storm surges and tidal changes. Although we are pleased to see that the Preferred Alternative has been designed to avoid impacts to natural resiliency features such as wetlands associated with the Roaches Run Waterfowl Sanctuary, we are concerned with the lack of analysis in the DEIS about anticipated future climate change effects in the project area. Among other things, this analysis could help inform additional design changes to ensure the project remains resilient to these effects and does not exacerbate the impacts of climate change on surrounding communities and resources. The final EIS should include such analysis.	See response to Comment 8B.	DEIS Chapter 6, Water Resources and Water Quality, Lines 488-497 FEIS/ROD Section 2.6.7, Floodplains Finding FEIS/ROD Section 1.4, DEIS Errata and Other Changes Errata ID: 31
Virginians for High Speed Rail			
9A	Our primary requests are to make sure that the new Long Bridge corridor is engineered for electrification and to provide cost estimates to electrify the segment in the final EIS.	The Long Bridge Project has been designed so as not to preclude electrification. Any future electrification in this location would use the lowest profile equipment available at the time. Based on industry trends, it is expected that the required clearance would be lower	n/a

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		than required for current equipment. However, some lowering of the track may be needed depending on equipment used.	
Washington Area Bicyclist Association			
10A	Washington Area Bicyclist Association (WABA) strongly supports the bike-pedestrian crossing mitigation measure for the Long Bridge Project, as is included in the Draft Environmental Impact Statement (EIS). The bike-pedestrian crossing needs to remain part of the Long Bridge Project, be fully funded, and built in a timely manner.	DRPT has committed to funding and construction of the bike-pedestrian bridge as mitigation for impacts to Section 4(f)-protected resources. See Table 2-2 in FEIS/ROD Section 2.3, Measures to Minimize Harm.	FEIS/ROD Section 2.3, Measures to Minimize Harm Commitment/Mitigation ID: B60
Washington Marina Company			
11A	(1) Interference with Pedestrian Access to WMC: The DEIS indicates the Project will include a proposed 4+ year closure of Maine Avenue pedestrian bridge, walkways and sidewalk, dramatically affecting pedestrian access to WMC and the Southwest Waterfront as a whole. The impacts include a doubling of pedestrian walk times from the Maine Ave. traffic circle to WMC. See Section 6.3 of the Environmental Consequences report [the "EC Report"] at Appendix D-3 of the DEIS.	FRA and DDOT appreciate the potential impact to pedestrian access to the Washington Marina due to removal of the Maine Avenue pedestrian bridge during construction. This impact is acknowledged in DEIS Chapter 17, Social and Economic Resources , line 431. DRPT would require the contractor to install wayfinding signage to direct pedestrians traveling from Maryland Avenue SW to Maine Avenue SW to use alternate routes.	FEIS/ROD Section 2.3, Measures to Minimize Harm Commitment/Mitigation ID: B38
11B	While the construction of a new, ADA-compliant pedestrian ramp seems positive, we have seen first-hand that there is an existing set of steps and bridge leading to the Mandarin Hotel which is hardly used. Further, there was a handicapped stair lift installed when the steps were finished but it was hardly ever used and eventually removed because it was vandalized. The DEIS itself acknowledges that an elevator in this location is out of service because it hasn't been maintained, and we have no reason to believe the use or maintenance will improve in the future. What the DEIS appears to ignore is that there is no direct ADA-accessible connection from the Mandarin Bridge into the Mandarin Hotel or the Portals. Mandarin guests have to have a room card to go through a locked gate and go up	While FRA and DDOT understand that the existing pedestrian bridge is not fully Americans with Disabilities Act (ADA)-compliant, any future pedestrian bridge would be required to meet ADA requirements by law.	n/a

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	two flights of stairs to enter the Hotel and pedestrians wishing to go into the Portals have to go up two long flights of stairs to the main concourse area. What is the sense of putting in a ADA- accessible ramp on a portion of our property when there is no ADA accessible connection on the other side and the current Mandarin Bridge and steps are hardly used? This is a waste of taxpayer money.		
11C	(2) Interference with Private/Police Vehicle Access to WMC: Similarly, the DEIS reflects that there will be intermittent traffic controls and lane closures (more specifically discussed in Sections 6.3.3.2 and 6.3.4.2 of the EC Report, including major temporary adverse impacts on traffic. The recited impacts include "direct impacts to public safety due to lane closures on Maine Avenue SW, which could inhibit or cause delays for police, fire, and emergency services." See Section 15.4.2.2. of the EC Report. With the expanding development of the Southwest Waterfront, and particularly its residential population, any steps which will impede police, fire or emergency services should be avoided by all reasonable means.	FRA and DDOT acknowledge the potential impacts to emergency response services due to construction activities affecting Maine Avenue SW. Throughout the final design and construction process, DRPT would work to minimize impacts through coordination with Federal, state, and local law enforcement and safety agencies to ensure access and minimize delays for emergency response during construction.	FEIS/ROD Section 2.3, Measures to Minimize Harm Commitment/Mitigation ID: A21
11D	(3) Interference with Public Transportation Access to WMC: The DEIS advises that the Project will create an adverse impact on Maine Avenue Metrobus, Loudoun County Transportation, and Potomac and Rappahannock Transit Commission bus service to Maine Avenue, SW. See Section 6.3.2.3 of the EC Report.	As noted in DEIS Chapter 9, Transportation and Navigation , public transit routes that utilize Maine Avenue would be impacted by any traffic delays caused by the Project construction, particularly in the peak period.	DEIS Chapter 9, Transportation and Navigation, Lines 580-588.
11E	(4) Interference with River Access to WMC: The DEIS states the Project will include periodic closure of the main navigation channel of the Potomac River. See discussion in Section 6.3.7.2 of the EC report. We anticipate this will lead mariners to avoid this area and WM for the 40-month anticipated duration of such potential closures, yet there is no mention of such impact in the DEIS; and	While it is true that construction activities would periodically close the main navigation channel and adjacent spans underneath Long Bridge, construction activities are expected to have minor impacts to overall use of the Potomac River. Closures would be intermittent and of short duration and would only occur in the immediate vicinity of Long Bridge. Access to the	DEIS Chapter 9, Transportation and Navigation, Lines 796-803.

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		Washington Channel (and therefore the Washington Marina) would not be affected.	
11F	(5) Interference with Visibility of WMC: Visibility of construction (including cranes and barges) and reduced visibility of the Washington Marina will both adversely impact the Washington Marina. Per Section 11.4.2.5 of the EC Report, "Construction activities would be highly visible, disrupting views from both lower elevations, such as the waterfront, and higher elevations, such as Maryland Avenue SW. Several views would be altered and, potentially, partially obstructed, including views from both the Maryland and Maine Avenues SW toward the monuments, toward and from the Washington Marina, and toward the Portals development from 14th and D Streets NW. This would reduce the cultural order of the visual environment in this area. Construction activities in these areas would cause temporary major adverse impacts to visual quality...."	As cited by the commenter, construction activities would be highly visible from the Washington Marina. To minimize this impact, DRPT would require the contractor to use aesthetically pleasing construction fencing and barriers to block potentially unattractive views into construction areas. Require contractor to consider use of screening vegetation to minimize visual impacts of construction activities on viewers.	FEIS/ROD Section 2.3, Measures to Minimize Harm Commitment/Mitigation ID: B70
11G	(6) Vibration/noise resulting from construction activities. It does not appear from the DEIS that the effect of noise or vibration on WMC or the piers or sea walls forming part of the WMC facility does not appear to have been considered;	As presented in DEIS Chapter 13, Noise and Vibration , potential vibration effects related to risk of structural damage has been assessed at the seawalls near the project site. The FEIS has been updated to indicate that this analysis includes the East Potomac Park seawall, Jefferson Memorial seawall, and the Washington Marina Club seawall. There is no potential for noise impact at these structures since noise is assessed for places with certain types of human use.	FEIS/ROD Section 1.4, DEIS Errata and Other Changes Errata ID: 90
11H	(7) Additional piers (navigation obstructions) and sedimentation in the river, resulting in loss of habitat and potential impact on migratory species. A significant portion of the WMC's clientele is engaged in recreational fishing, so additional negative impacts on WMC's business are expected; and	As noted in DEIS Chapter 5, Natural Ecological Systems and Endangered Species , lines 377-378, the Project is expected to cause negligible impacts to fish, including migratory species. This is because of the relatively small impact to habitat compared to the amount of available habitat in the river.	DEIS Chapter 5, Natural Ecological Systems and Endangered Species, Lines 377-378
11I	(8) Perhaps most importantly, the DEIS reflects several inconsistent references to scope and impact of temporary and	Chapter 17, Social and Economic Resources, has been revised to indicate that the temporary loss of parking	DEIS Chapter 9, Transportation and

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	<p>permanent loss of parking at WMC. Per Section 6.3.5.2 of the EC Report, "Loss of surface parking at Washington Marina would be considered a major impact because it constitutes the entirety of the marina's parking" (see also, Section 9.4.1.2 of the report).</p> <p>Characterization of a portion of this as "temporary" appears misleading as the 4+ year duration should reasonably be anticipated to lead to permanent loss of business to the Washington Marina as slip rentals likely shift to other marinas on a permanent basis. The EC Report later appears to acknowledge this when it recites in Section 14.4.2.2: "Temporary parking for Washington Marina would be established off site for the duration of construction (the location of temporary parking for the marina will be identified later in the planning process as final design progresses and in coordination with the marina). Construction would have a potentially major direct impact to Washington Marina considering both the temporary loss of parking and the inconvenience of the temporary removal of the pedestrian bridge for approximately 5 years. These impacts would be inconvenient for Washington Marina and its patrons and could result in the loss of patrons."</p> <p>Section 12.4.1.2 of the DEIS incorrectly states this will not affect the function of the land use. This is patently untrue. First, WMC now understands we will temporarily lose our entire parking areas for construction staging as the Project is currently proposed. Nothing in the DEIS shows consideration of any alternative locations for construction staging.</p> <p>Second, absent long-term parking for boat slip renters, rentals of the boat slips at Washington Marina will not be economically viable, rendering the slips provided at taxpayers'</p>	<p>could, without mitigation, constitute a major permanent impact to marina operations. During final design, DRPT would coordinate with Washington Marina to determine appropriate compensation for loss of parking spaces and revenue.</p> <p>The EIS consistently acknowledges the potential major temporary impact due to loss of the Washington Marina parking lot during construction:</p> <ul style="list-style-type: none"> • Chapter 9, Transportation and Navigation (lines 765-766) states that "the temporary closure of the surface parking at the Washington Marina . . . would be considered a major impact because it constitutes the entirety of the marina's parking." • Chapter 12, Land Use and Property (lines 363-364) states that there would be a "major direct adverse impact, as temporary loss of parking would impact the use and operation of the business." • Chapter 17, Social and Economic Resources (lines 429-430) states that "construction would have a potentially major direct impact to Washington Marina, considering . . . the temporary loss of parking." <p>For permanent impacts, the analysis considers land use impacts and economic impacts differently, which is discussed below in the response to Comment 11K.</p> <p>Given the complexity of the construction phasing for the Long Bridge Project, construction staging and phasing were developed to understand potential impacts. In</p>	<p>Navigation, Lines 765-766</p> <p>DEIS Chapter 12, Land Use and Property, Lines 363-364</p> <p>DEIS Chapter 17, Social and Economic Resources, Lines 429-430</p> <p>FEIS/ROD Section 1.4, DEIS Errata and Other Changes</p> <p>Errata ID: 10, 11, 18, 19, 23, 24, 29, 45, 57, 79, 85, 139, 140, 145, 146</p> <p>FEIS/ROD Section 2.3, Measures to Minimize Harm</p> <p>Commitment/Mitigation ID: A10</p>

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	expense basically unusable. This appears to be acknowledged in Section 12.5.1.2, where the DEIS again characterizes such loss of parking as "major adverse direct impact, as temporary loss of parking would impact the use and operation of the business."	<p>some cases, a larger area of impact needed to be assumed until further design development could occur.</p> <p>It is likely that the entirety of the marina parking lot will not need to be closed for construction staging, and that some parking will be able to remain during construction. Therefore, the FEIS has been revised to reflect complete closure of the portion of the parking lot closest to the railroad corridor, with the remainder of the parking remaining in use. Flagging may be required to ensure safe operations in the lot when construction equipment or vehicles need to pass.</p> <p>During final design, DRPT would work to minimize impacts due to construction and would work with the marina to develop appropriate mitigation for impacts to the parking lot.</p>	
11J	Further, approximately one-third of all Washington Marina parking would be permanently lost to relocation of the pedestrian bridge, as acknowledged in Section 6.2.5.2 of the EC Report (see also, Section 18.3.5.1, reflecting loss of 1/3 of such parking). In addition to servicing our recreational and commercial slip customers, the WMC west parking lot provides space for monthly parking and WMC derives significant revenue from these monthly contracts. We currently have approximately 85 parking customers for such spaces, the majority of which are government employees that work at the Treasury building, yet this does not appear to have been considered in the DEIS.	<p>During final design, DRPT would coordinate with Washington Marina to determine appropriate mitigation for impacts to the parking lot.</p> <p>Added "and monthly permit holders" to Table 9-3 in the DEIS, to describe users of the Washington Marina parking lot.</p>	<p>FEIS/ROD Section 1.4, DEIS Errata and Other Changes</p> <p>Errata ID: 29</p> <p>FEIS/ROD Section 2.3, Measures to Minimize Harm</p> <p>Commitment/Mitigation ID: A10</p>
11K	We also note that Section 9.3.1.2 of the EC Report has a different "take" on the impact on the WMC parking, stating "The reconstruction of the pedestrian ramp and the right-of-way needed for the additional tracks would result in minor	Section 9.3.1.2 of the Environmental Consequences Report addresses land use impacts, which Section 14.3.2.2 addresses economic impacts. These analyses address impacts differently. Specifically:	FEIS/ROD Section 2.3, Measures to Minimize Harm

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	<p>adverse direct impacts on the western side of the Washington Marina parking lot, causing a loss or relocation of several parking spaces, but still allowing approximately 80 percent of the lot to continue to function as it does in the existing condition." In section 14.3.2.2, the report states the Washington Marina "would permanently lose approximately 20 parking spaces out of 88 existing spaces [23%]. The exact number of spaces to be removed, and the exact impacts to Washington Marina, would be determined as final design advances and through further coordination with Washington Marina. The loss of parking spaces would constitute a moderate direct adverse impact on Washington Marina without mitigation measures. It is anticipated that with mitigation measures, including reconfiguration of the existing surface parking area after the replacement pedestrian bridge is constructed, the net loss of parking spaces would be negligible." For WMC, the loss of even 20 parking spaces used for long-term boat slip renters is likely to erase the profitability of such operations.</p>	<ul style="list-style-type: none"> The land use analysis evaluates whether the impact causes a change in land use function. While a reduction in parking spaces is an economic impact to the marina, it does not result in a complete loss of the parking lot and its ability to serve the marina's customers. As noted above in the response to Comment 11J, DRPT would coordinate with the Washington Marina to determine appropriate mitigation for impacts to the parking lot. The economic impact analysis evaluates whether the impact would cause a change in revenue or affect the economic viability of a commercial operation. In this case, it is assumed that the impact would affect the marina's revenue to the extent that it should be mitigated. As noted above in the response to Comment 11J, DRPT would coordinate with the Washington Marina to determine appropriate mitigation for impacts to the parking lot. 	<p>Commitment/Mitigation ID: A10</p>
11L	<p>Any loss of parking, temporary or permanent would have a devastating impact, not only to our business, but also to the three riverboat companies that currently rent dock space from WMC. If this Project moves forward with taking the WMC parking, we estimate that this alone will cause the loss of 40-50 jobs as a result.</p>	<p>FRA and DDOT acknowledge that, based on information provided by Washington Marina, impacts to the marina parking lot could result in a loss of revenue and, according to the marina, potential loss of jobs. The EIS has been revised to indicate that the marina receives revenue from renting out parking spaces.</p>	<p>FEIS/ROD Section 1.4, DEIS Errata and Other Changes Errata ID: 140</p>
11M	<p>In addition, "Yacht Basin One", established by President Roosevelt and the first model marina in Washington, DC, has been home to the Washington Marina Company since 1951 and the facility in continuous operation since 1941. Neither the historical basis, nor the long-term dedication to this use appears to have been properly considered.</p>	<p>As noted in DEIS Appendix E1, Area of Potential Effects and Historic Properties Technical Report, the Washington Marina building has been determined eligible for listing in the National Register of Historic Places. The Determination of Eligibility does not indicate that the yacht basin itself is considered historic, and during the Section 106 process the District of Columbia</p>	<p>n/a</p>

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		State Historic Preservation Office (DC SHPO) did not request that the yacht basin be evaluated for eligibility. In addition, the Project would affect the Washington Marina parking lot, but would not affect the building or the yacht basin.	
11N	Finally, we note Section 14.5.2 of the EC Report states "The Virginia Department of Rail and Public Transportation, the project sponsor for final design and construction, would continue to coordinate with the Washington Marina and NPS to develop appropriate mitigation for adverse temporary and permanent impacts, including potential loss of revenue and patrons due to the temporary and permanent removal of parking, to these establishments due to the Project"(emphasis added). To date, we are unaware of any effort by DRPT to contact the Washington Marina regarding such mitigation for parking or any of the other impacts cited above. Indeed, it does not appear to use that any alternative approaches to minimize such impacts have been considered. This appears to be contrary to both the spirit and letter of the NEPA process.	DDOT has been the Project Sponsor for the National Environmental Policy Act (NEPA) process, and was therefore the agency that initiated coordination with the marina. Following publication of the DEIS, DRPT and DDOT jointly coordinated with the marina through regular meetings. While specific minimization and mitigation measures were not agreed to during the NEPA process, during final design DRPT would work with the marina to reach agreement on measures to minimize impacts or mitigate for unavoidable impacts.	FEIS/ROD Section 2.3, Measures to Minimize Harm Commitment/Mitigation ID: A10