LONG BRIDGE PROJECT
Connecting North and South Through our Nation's Capital

Appendix E:

Common Comment Categories with Responses

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1.0 Introduction

This appendix provides a summary of comments received by topic area. The section is organized alphabetically by topic and sub-topics.

Responses are provided for the comment summaries. Comments or portions of comments concerning issues not substantive to the Project or to the Draft Environmental Impact Statement (DEIS) are excluded from the summaries in this section. The following outline lists the page numbers where specific topics are summarized.

2.0 Railroad Bridge

2.1. Design Modification Suggestion

Summary of Comments: Increase rail's mode share is critical to meeting environmental goals and the Project should be built over capacity to support future rail development in the area. Also, as a part of the Long Bridge Project, an additional Amtrak station should be added at Long Bridge Park/Crystal City/National Landing to enhance Amtrak travel and connections to/from Northern Virginia.

Response: Beneficial permanent effects on railroad infrastructure and operations are the intended outcome of the Project, by providing additional capacity for future railroad service. The Preferred Alternative would result in major permanent direct beneficial impacts on the volume of trains that the Long Bridge can accommodate, allowing major permanent direct beneficial impacts on train service frequency.

During the alternatives development process, the Federal Railroad Administration (FRA) and the District Department of Transportation (DDOT) considered concepts that would increase the number of tracks over the Potomac River to five or more. However, these concepts were eliminated because building more than four tracks over the river would construct more tracks that could be effectively utilized. There are no long-term plans to expand the right-of-way beyond four tracks approaching RO and L'Enfant (LE) Interlockings. With a five-track crossing and four-track approaches, the fifth track would essentially be a siding or "pocket track." Trains using the fifth track would be required to switch back to one of the four tracks on either side of the bridge, requiring trains to slow down and move between switches on either side of the bridge. This would result in the fifth track being largely unused.

Construction of a new Amtrak station is outside the scope and beyond the logical termini of the Project. A new Amtrak station would not meet the Project's Purpose and Need.

Where to find in the FEIS ROD: See DEIS online at http://longbridgeproject.com/deis/
(**Chapter 9, Transportation; Appendix B1, Alternatives Development Report**)

2.2. Impacts to Water Resources

Comment: A large part of the construction will take place over the Potomac River, requiring barges to move workers and supplies which may result in potential for excess pollution into the river during the construction period. The project may also cause more pollution to the Chesapeake Bay. The Chesapeake Bay is already over-polluted.

Response: The Preferred Alternative would avoid adverse impacts to surface water quality through implementation of various avoidance, minimization, and mitigation measures. These measures are described below.

To preserve water quality, the Virginia Department of Rail and Public Transportation (DRPT), the Project Sponsor, would implement stormwater best management practices (BMPs) to mitigate long-term adverse impacts to water quality in the Roaches Run and Potomac River watersheds if necessary. These BMPs would decrease runoff volume and peak flow rate and would provide the prescribed treatment volume to mitigate adverse impacts to surface water and stormwater. These BMPs would also provide the prescribed recharge volume to mitigate adverse impacts to groundwater quantity and quality. DRPT could implement treatment BMPs such as oil/grit separators to treat runoff prior to discharge; design of stormwater BMPs would be completed during final design.

Erosion and sedimentation controls would be implemented in accordance with the U.S. Environmental Protection Agency's (EPA) 2017 National Pollutant Discharge Elimination System (NPDES) Construction General Permit, 2018 Virginia Pollution Discharge Elimination System (VPDES) Storm Water General Permit, DOEE, NPS, and Arlington County requirements. These include requirements to provide an effective means of eliminating discharges of spilled or leaked chemicals, including fuels and oils, from construction activities. Contractors would be required to store, handle, and dispose of materials in a manner that prevents exposure of the products to precipitation and/or stormwater.

On-site treatment of pumped groundwater would be in accordance with the District Department of Environment and Energy (DOEE), DC Water, and Virginia Department of Environmental Quality (VDEQ) requirements for treatment and metering of pumped groundwater. The discharge of treated pumped groundwater directly to surface waters would minimize temporary MS4 infrastructure capacity and sedimentation impacts during construction.

The nature of the project as bridge construction over a Resource Protection Area (RPA), the Potomac River, and its buffer means complete avoidance of the RPA is not feasible. In areas of bare ground, the contractor would be required to employ proper erosion and sediment control techniques to help reduce runoff that would negatively affect RPAs. Efforts made to avoid forest and vegetation impacts as part of the terrestrial vegetation avoidance and minimization would also provide avoidance and minimization in the RPA buffer.

Where to find in the FEIS ROD: Section 2.3, Measures to Minimize Harm;
Also see DEIS online at http://longbridgeproject.com/deis/ **(Chapter 6, Water)**

2.3. Mitigation Suggestion

Comment: Part of the Section 4(f) mitigation strategy should be to incorporate a commitment by the sponsoring parties to repaint both the existing Long Bridge over the Potomac River and the rail bridge over I-395 in the District of Columbia. Both are rusted and covered in graffiti. A more visually appealing project is essential to ensure the proposed alternative does not negatively impinge on overall viewsheds in the corridor. Painting these facilities will help accomplish that goal.

Response: The existing railroad bridge over I-395 will be replaced as part of the Project, as described in Chapter 3 of the DEIS. Therefore, repainting the existing Long Bridge is not necessary. Under the Preferred Alternative, CSXT will continue to own and maintain the existing Long Bridge. Therefore, repainting the Long Bridge is not within FRA or DRPT's control.

Where to find in the FEIS ROD: See DEIS online at http://longbridgeproject.com/deis/
(**Chapter 3, Alternatives**)

2.4. Operations Impacts During Construction

Comment: Consider revising the requirement for two tracks to be in service at all times throughout construction. Freight and passenger trains should be rerouted for 5-15 days to allow the three new 4-track bridge structures at Ohio Drive SW, Washington Channel, and Maine Avenue SW to be rebuilt simultaneously. This could greatly decrease the construction time and costs associated with a longer timeline. This is similar to the Cameron Run bridge replacement in Alexandria that was done over a long weekend.

Response: Rerouting freight and passenger trains for an extended period of time is not practical and would result in costs of extraordinary magnitude. The next closest rail crossing of the Potomac River is in Harpers Ferry, West Virginia. Closing the crossing at Long Bridge would likely result in complete suspension of Virginia Railway Express (VRE) and Amtrak service between Northern Virginia and the District during that time, given the length of the detour. In addition, CSXT, the owner of the Long Bridge Corridor, has stated that two tracks must remain in operation during construction.

Where to find in the FEIS ROD: See DEIS online at http://longbridgeproject.com/deis/
(**Chapter 2, Purpose and Need**)

2.5. Support for Action Alternative B

Comment: Action Alternative B is the better alternative. Though it will cost more and take longer, replacing the existing Long Bridge now as part of the overall project would save money in the long run by not having to pay as much in maintenance. The existing bridge will have to be replaced someday, and this Project is the opportune time.

Response: The owner of the current Long Bridge is CSXT, and they have stated that they maintain Long Bridge in proper condition for railroad purposes and the bridge is sufficient to meet the needs of their freight customers for the foreseeable future. CSXT annually inspects all their bridges and completed a rehabilitation of Long Bridge in October 2016.

The cost of Action Alternative B is approximately $900 million more than Action Alternative A and both alternatives equally meet Purpose and Need. Under the Preferred Alternative, CSXT will continue to own and maintain the existing bridge.

Where to find in the FEIS ROD: See DEIS online at http://longbridgeproject.com/deis/
(**Chapter 3, Alternatives**)

2.6. Funding

Comment: Obtain funding from private developers such as Amazon HQ2, Crystal City developers, and the Wharf developers for this critical investment rather than the National Park Service or U.S. Department of Transportation funds.

Response: The funding structure for the Long Bridge Project has yet to be determined. It is assumed that funding sources would be from a combination of Federal and state, however, this has not been confirmed and this would not preclude other sources of funding.

Where to find in the FEIS ROD: See DEIS online at http://longbridgeproject.com/deis/
(**Chapter 1, Introduction**)

2.7. Construction Impacts to the Mount Vernon Trail

Comment: The Mount Vernon Trail (MVT) is used to commute by bicycle from Virginia to the District. Closing the MVT for years would have a daily impact on commutes.

Response: A portion of the MVT will be temporarily be relocated less than 0.25 mile from the main trail for public safety and to allow construction access and staging. The relocation would last approximately 2 years. Users of the MVT would experience a different trail route, away from the Potomac River and towards the GWMP roadway. Wayfinding signage would be installed, as appropriate, to redirect pedestrian and bicycle traffic during temporary closures of the MVT due to construction. In addition, temporary crossings of trails for materials delivery would be scheduled during evening hours to the extent practicable, to minimize impacts to trail users. The Preferred Option would have major permanent direct beneficial impacts to the pedestrian and bicycle network. By providing additional pedestrian and bicycle access to and between Crystal City, the MVT, and East Potomac Park, the Preferred Option would increase the connectivity of, and have a beneficial impact on, the existing pedestrian and bicycle network. The new bike-pedestrian connection between the District and Arlington would be a pathway dedicated solely to cyclists and pedestrians and would provide an enhanced connection between (via Long Bridge Park), the MVT, and destinations in the District.

Where to find in the FEIS ROD: See DEIS online at http://longbridgeproject.com/deis/
(**Chapter 16, Recreation and Parks**)

2.8. Noise and Vibration Impacts to the Mount Vernon Trail

Comment: The current heavy rail traffic travelling over the trail is noisy and uncomfortable for trail users, and in the full build condition, many more heavy trains will be travelling over thousands of trail users per day. The noise and vibrations from a heavy freight train travelling no more than 20' overhead are overwhelming, and this impact will be multiplied.

Response: The noise and vibration analysis was conducted in accordance with FTA guidelines. These guidelines require assessment of potential noise and vibration impacts at several categories of sensitive land uses. Parks used for active recreation, such as bicycle trails or running paths, are not considered noise-sensitive. Vibration is assessed only inside buildings with sensitive uses, i.e. residences or libraries. Therefore, noise and vibration impacts were not assessed at the Mount Vernon Trail as it passes under Long Bridge.

Where to find in the FEIS ROD: See DEIS online at http://longbridgeproject.com/deis/ (**Chapter 13, Noise and Vibration**)

3.0 Bike-Pedestrian Crossing

3.1. Cost-Benefit of Bike-Pedestrian Crossing

Summary of Comments: The new bike-pedestrian crossing would only go to East Potomac Park and would not increase access to the District from Arlington. The 14th Street Bridge provides reasonable access to downtown. A cost-benefit analysis of a new bike-pedestrian crossing should be conducted to determine the feasibility of a new bridge.

Response: Bicycle and pedestrian connectivity is an element of regional multimodal transportation network plans. A bike-pedestrian connection in the vicinity of Long Bridge is included in the NPS *Paved Trails Study* (2016)[1] and *moveDC* (2014),[2] the multimodal long-range transportation plan for the District of Columbia (the District). The *Long Bridge Study* (Phase I Study), completed in 2015, evaluated the railroad network system as well as the overall multimodal connectivity and capacity needs in the area, including potential bicycle and pedestrian opportunities.[3] Modeling for the Phase I Study identified an increase in pedestrian and bicycle use of the trail network with the addition of bike-pedestrian connections, with most of the use originating for the District.

The only existing bike-pedestrian path across the Potomac River in the vicinity of Long Bridge is attached to an interstate highway on the 14th Street Bridge. The next closest crossing is over a mile north via the Arlington Memorial Bridge. According to bi-directional counter data available on the public website of BikeArlington, an Arlington County program, the 14th Street Bridge path at the Mount Vernon Trail (MVT) carried 59,391 bicyclists and 8,802 pedestrians in July 2018.[4] On average in July 2018, the path carried 1,583 bicyclists and 357 pedestrians per day on Saturdays and Sundays. A total of 2,203 bicyclists and 454 pedestrians used the path on July 4, 2018.[5] A second connection would reduce some of the pedestrian and cyclist traffic on the 14th Street Bridge, would be a pathway dedicated solely to cyclists

[1] NPS, National Capital Region. *Paved Trails Study*. 2016. Accessed from https://parkplanning.nps.gov/document.cfm?documentID=74623. Accessed October 20, 2018.

[2] DDOT. *moveDC: the District of Columbia's Multimodal Long-Range Transportation Plan*. 2014. Accessed from http://www.wemovedc.org/. Accessed October 20, 2018.

[3] DDOT. *Long Bridge Study*. 2015. Accessed from https://ddot.dc.gov/publication/final-long-bridge-study. Accessed October 20, 2018.

[4] BikeArlington. Undated. Counter Dashboard. Accessed from http://counters.bikearlington.com/. Accessed October 21, 2018.

[5] BikeArlington. Undated. Counter Dashboard. Accessed from http://counters.bikearlington.com/. Accessed October 21, 2018.

and pedestrians, and would provide an enhanced connection between Long Bridge Park, the MVT, GWMP, and East and West Potomac Parks.

The bike-pedestrian crossing was developed as a mitigation measure for the Long Bridge Project. DDOT and FRA assessed four bike-pedestrian crossing options and also considered the cost of the options. The option carried forward would be located on a separate structure, 25 feet upstream of the new upstream railroad bridge. The benefits of this configuration are that it would have the lowest security risk of the options evaluated, fewer impacts to the river, and the construction cost would be less than the other considered bike-pedestrian crossing options.

Where to find in the FEIS ROD: See DEIS online at http://longbridgeproject.com/deis/
(**Chapter 22, Bike-Pedestrian Crossing**)

3.2. Bike-Pedestrian Crossing Connections

Summary of Comments: Several comments were received suggesting that the bike-pedestrian crossing connect to other destinations:

- **Access to the Wharf and beyond East Potomac Park:** Build a bike-pedestrian crossing connecting Virginia and the Wharf. Add or improve the existing bike-pedestrian access point in East Potomac Park. Improving this middle access point would improve bike-pedestrian traffic between Virginia, East Potomac Park, and the Wharf, thereby improving business and park usage. Any northward extension of the bike-pedestrian crossing past East Potomac Park would be welcome to the many District, Arlington, and Alexandria residents, workers and visitors who bike, walk and run across the Potomac River.
- **Access to Ohio Drive SW:** Extend the path to come down at grade on the eastern portion of Ohio Drive Southwest (as opposed to the currently proposed western portion of Ohio Drive Southwest). The current option requires cyclists or pedestrians crossing the Francis Case Memorial Bridge to travel approximately 0.72-0.80 miles. A bike-pedestrian path extended to the eastern loop of Ohio Drive SW would reduce that distance to approximately 0.47 miles.

Response: There is insufficient 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 and to the Wharf, but these would need to be pursued as part of separate projects.

Opportunities considered follow the trajectory of the Long Bridge Corridor as part of mitigation for impacts to the parks. The crossing would provide an important connection between the parks and the regional trail system and therefore has a regional recreational benefit. The bike-pedestrian crossing would connect to the planned trail network within Long Bridge Park, which will connect to the on-street bicycle network following Long Bridge Drive to Crystal City. The crossing to Long Bridge Park would provide the option for bicyclists traveling between the Crystal City, Pentagon City, and Potomac Yard areas and the District to avoid the MVT, easing congestion on that heavily used trail.

Where to find in the FEIS ROD: See DEIS online at http://longbridgeproject.com/deis/
(**Chapter 22, Bike-Pedestrian Crossing**)

3.3. Design Modification Suggestions for Bike-Pedestrian Crossing

Summary of Comments: Several comments were received providing suggestions for design modifications to the bike-pedestrian crossing:

- **Ramps and Approaches:** Curve the bike path approaches and remove 90-degree angles as they are not safe for tandem bikes, longer cargo bikes, and emergency vehicle access. Ramps should be designed with safe curves and stairs.

- **Width:** Increase the bike-pedestrian crossing width to accommodate multi-user types (such as cargo bikes, tandem bikes, bike trailers, etc.) and provide safe spacing between pedestrians and bikes.

- **Close Unused Areas:** Close the ramp from 14th Street onto Maine Avenue as it was replaced with nearby ramps in the 1960's and would ease construction. Close the ramps on East Potomac Island to easily allow the bike path to directly connect with the Anacostia Riverwalk path.

- **Rest Areas:** Consider one or two small rest areas on the bridge to give users a place to stop and take in the view without impeding other crossing users.

- **Railings**: Incorporate railing design that does not reduce the effective bridge width.

Response: The current design of the bike-pedestrian crossing is preliminary. The materials and dimensions of the bridge would be confirmed in a final design phase following completion of the environmental review process. Specific designs for the bridge and railing have not yet been determined but would be Americans with Disabilities Act (ADA) compliant and in accordance with the requirements of the authority having jurisdiction over final design and construction.

Where to find in the FEIS ROD: See DEIS online at http://longbridgeproject.com/deis/ (**Chapter 22, Bike-Pedestrian Crossing**)

3.4. Impacts to the Mount Vernon Trail

Summary of Comments: Build the bike-pedestrian crossing at the same time as the rail bridge to reduce the amount of time that the MVT will be impacted.

Response: During final design, DRPT will 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.

Where to find in the FEIS ROD: Section 2.3, Measures to Minimize Harm; also see the DEIS online at http://longbridgeproject.com/deis/ (**Chapter 22, Bike-Pedestrian Crossing**)

3.5. Mitigation Suggestion

Summary of Comments: Please include improvements to the bike-pedestrian crossing plans such as including construction of the Gravelly Point bypass which is currently in the National Park Service's (NPS) Paved Trails Plan. This bypass would help mitigate the risks associated with increased trail traffic.

Response: As noted in the DEIS, the new bike-pedestrian connection would make it easier for users from Pentagon City, Crystal City, Potomac Yard, and surrounding areas to cross the GWMP and the Potomac River in this location. While some users would likely use the ramp to access the MVT, thereby increasing trail traffic as noted by the commenter, other pedestrians and bicyclists who currently use the MVT to access the 14th Street Bridge would now use the direct connection provided by the new bridge and never access the MVT at all. Therefore, the new connection would be expected to decrease volumes and current congestion on the MVT. Finally, the ramp landing at the MVT would be designed to minimize conflict between users already on the trail and those coming from the bike-pedestrian bridge.

Where to find in the FEIS ROD: See DEIS online at http://longbridgeproject.com/deis/
(**Chapter 22, Bike-Pedestrian Crossing**)

3.6. Support for Connecting Bike-Pedestrian Crossing to Railroad Bridge

Comment: Include the bike-pedestrian crossing on the railroad bridge rather than separately. This would be economically and logistically easier than building a separate bridge structure. Support for Constructing Bike-Pedestrian Crossing as Part of the Same Contract as Railroad Bridge.

Response: FRA and DDOT evaluated several options for the bike-pedestrian crossing, including two that would have shared a structure with the new upstream railroad bridge. These options would require extending the railroad bridge piers upstream by approximately 22 feet to support the bike-pedestrian crossing. Larger piers would result in more environmental impacts as well as a greater cost compared to single-column piers supporting an independent bike-pedestrian bridge. The need to carry trains as well as bicycles and pedestrians means the bridge piers would be sized to support the heavier railroad load.

FRA and DDOT also conducted a Threat, Vulnerability, and Risk Assessment (TVRA, or security assessment) and Hazard Assessment (HA) on the bike-pedestrian crossing options. Options sharing the structure of the new upstream railroad bridge would have high risk to the railroad bridge by providing easy access to the railroad bridge from the bike-pedestrian crossing. These options would require substantial security measures, which would include some combination of protective screening, cameras, thermal imaging, radar equipment, and regular law-enforcement patrols to make it more difficult for pedestrians to access the railroad bridge.

Where to find in the FEIS ROD: See DEIS online at http://longbridgeproject.com/deis/
(**Chapter 22, Bike-Pedestrian Crossing**)

3.7. Constructing Bike-Pedestrian Bridge Concurrently with the Railroad Bridge

Summary of Comments: The bike-pedestrian crossing bridge should be constructed at the same time as the railroad bridge to save time and construction costs, and to prevent the bike-pedestrian bridge from being delayed or not built.

Response: The bike-pedestrian crossing is part of the mitigation for impacts to parks from the construction of the railroad bridge. The bike-pedestrian bridge is therefore a required element of the Long Bridge Project. Specific timing for construction will be worked out as design advances. Whether the bike-pedestrian connection is constructed concurrently with the railroad bridge or immediately following construction of the railroad bridge will be dependent on needs for construction phasing and staging.

Where to find in the FEIS ROD: See DEIS online at http://longbridgeproject.com/deis/
(**Chapter 22, Bike-Pedestrian Crossing**)

3.8. Support for Bike-Pedestrian Crossing

Comment: Ensure that there is a bridge for pedestrians and bicycles connecting to trails on both sides to help users commute multi-modally.

Response: As part of mitigation for impacts to parks, DRPT would construct a bike-pedestrian only connection between Long Bridge Park in Arlington, Virginia and East Potomac Park in the District, crossing the Potomac River on the upstream side of the new upstream railroad bridge. The southern end of the bike-pedestrian crossing would connect to a path at the northern end of the Long Bridge Aquatic and Fitness Center and Park Expansion in Long Bridge Park, which is currently under construction and scheduled for completion in 2021. The bike-pedestrian path would cross over the George Washington Memorial Parkway (GWMP), MVT, and the Potomac River on a 2,300-foot-long bridge consisting of prefabricated truss spans. The northern end of the bike-pedestrian crossing would connect to Ohio Drive SW in East Potomac Park.

Where to find in the FEIS ROD: See DEIS online at http://longbridgeproject.com/deis/
(**Chapter 22, Bike-Pedestrian Crossing**)

3.9. Support for Bike-Pedestrian Crossing Downstream of Long Bridge

Comment: A downstream location for the bike-pedestrian crossing is preferable from a user standpoint because it would be much quieter and have better views.

Response: FRA and DDOT considered an independent bridge downstream of the existing railroad bridge during the screening of options for a bike-pedestrian crossing (Option 3). This option was eliminated from consideration because it would introduce a new visual element into the viewsheds from GWMP, East Potomac Park, and the Potomac River, resulting in additional impacts, and because it could not provide a direct connection to Long Bridge Park and from there to Crystal City. NPS did not support Option 3 as Section 4(f) mitigation because of its visual impacts.

Where to find in the FEIS ROD: See DEIS online at http://longbridgeproject.com/deis/
(**Chapter 22, Bike-Pedestrian Crossing**)