

APPENDIX B2

RESPONSES TO STATE AGENCY COMMENTS



D.C. TO RICHMOND SOUTHEAST HIGH SPEED RAIL


Appendix B2

RESPONSES TO STATE AGENCY COMMENTS

This Appendix Section B2 provides detailed responses to State agency letters, presented in the below order:

- Virginia Department of Environmental Quality (DEQ) B-61
- Virginia Department of Historic Resources (DHR) B-216

VIRGINIA DEQ



COMMONWEALTH of VIRGINIA
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November 3, 2017

Emily Stock
Manager of Rail Planning
Virginia Department of Rail and Public Transportation
600 East Main Street, Suite 2102
Richmond, Virginia 23219

RE: Comments on the Tier II Draft Environmental Impact Statement for the Washington, D.C. to Richmond Southeast High Speed Rail Project, Federal Railway Administration and Virginia Department of Rail and Public Transportation

Dear Ms. Stock:

The Commonwealth of Virginia has completed its review of the above-referenced document. The Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of federal environmental documents submitted under the National Environmental Policy Act (NEPA) and responding to appropriate federal officials and project contacts on behalf of the Commonwealth. This is in response to the September 2017 Draft Environmental Impact Statement (DEIS) prepared by the U.S. Department of Transportation Federal Railroad Administration and the Virginia Department of Rail and Public Transportation for the above-referenced project. The following agencies, localities and planning district commissions (PDC) participated in the review of this proposal:

Department of Environmental Quality (DEQ)
 Department of Conservation and Recreation (DCR)
 Department of Health (VDH)
 Department of Historic Resources (DHR)
 Richmond Regional PDC
 Crater PDC
 Virginia Outdoors Foundation
 Town of Ashland
 City of Fredericksburg
 Fairfax County

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In addition, the Department of Agriculture and Consumer Services, Department of Game and Inland Fisheries, Department of Forestry, Marine Resources Commission, Department of Transportation, the Northern Virginia Regional Commission, George Washington Regional Commission, the Cities of Richmond, Fairfax, and Alexandria, the Town of Quantico and Chesterfield, Henrico, Hanover, Caroline, Spotsylvania, Stafford, Prince William, and Arlington counties were invited to comment on the proposal.

PROJECT DESCRIPTION

The U.S. Department of Transportation Federal Rail Administration (FRA) and the Virginia Department of Rail and Public Transportation (DRPT) (project sponsors) have jointly released a DEIS for the proposed Washington, D.C. to Richmond Southeast High Speed Rail (DC2RVA) project to improve intercity rail service in the project corridor. The purpose of DC2RVA project is to provide a high speed passenger rail service with increased service frequencies, reliability, and travel time, including an expanded commuter rail service in the corridor and to accommodate the growth of freight rail in the region. The 123-mile project is primarily located along an existing rail corridor owned by CSX Transportation (CSXT, owner) from the Long Bridge at the Potomac River in Arlington to Centralia in Chesterfield County that generally parallels Interstate-95 (I-95). Proposed improvements include the construction of additional main line tracks and crossovers, the straightening of curves to allow for higher speeds, improvement of intercity passenger rail stations, improved sidings and signals, and roadway crossing safety improvements. In most areas the project proposes to add an additional main track either to the east or west of the existing tracks depending on the location. The proposed Build Alternatives include bypass options around downtown areas for the City of Fredericksburg and the Town of Ashland where alignments outside of existing right-of-way (ROW) were considered. The rail corridor is shared by passenger rail services (Amtrak and Virginia Railway Express) and freight services by CSXT.

DC2RVA is the northern portion of the larger Southeast High Speed Rail (SEHSR) corridor from Washington, D.C. to Charlotte, NC which was considered in a 2002 Tier I EIS which established the overall purpose and route for providing a competitive transportation alternative to highway or air travel for travelers within the region. The Tier II DEIS currently under consideration carries forward the purpose from the Tier I EIS within the Washington, D.C. to Richmond corridor and explores the infrastructure improvements that would be necessary to provide the desired improved level of rail service. The project is needed to increase rail capacity due to regional population growth, congestion in the I-95 corridor and in air travel congestion, the growth of freight traffic. Additionally the existing infrastructure is reaching its capacity and there is a need to provide reliable transportation options for passengers and goods. Nine daily roundtrip passenger trains would be added to the corridor by 2025 as a result of the project implementation.

DRPT and the FRA are adopting an incremental approach to the construction of infrastructure improvements and are working with CSXT to identify opportunities to implement the improved service as fast as possible. Complete build-out and full

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implementation is dependent on funding and permitting approvals but it is estimated that the new service could be in operation by 2025. Once the Tier II EIS process has been completed, the goal is to have completed the NEPA process, thereby making the project eligible for federal funding.

Build Alternatives were developed and screened to be carried forward for consideration in the DEIS with a focus on a proposed alignment's ability to reduce trip times and increase the reliability of operations, with the least potential to impact the environment, taking into account construction cost. Six "Alternative Areas" were identified with area-specific build alternatives developed for each area (23 total Build Alternatives considered for the corridor as a whole) along the 123-mile project route. DRPT has linked area-specific build alternatives to form a single DRPT Recommended Preferred Alternative for the corridor. Input received from the DEIS review process will be considered prior to the issuance of a Final EIS and FRA's selection of the Preferred Alternative. The Alternative Areas, Build Alternatives and DRPT recommended area-specific build alternative are summarized in Table 1 below. The DRPT recommended preferred alternative is outlined to provide the public with a clear understanding of the DRPT's conclusions at this stage of the project development. The recommendation is non-binding.

Table 1. DC2RVA Alternative Areas, Build Alternatives, and DRPT Recommended Preferred Alternative.

Alternative Area	Area- Specific Build Alternatives	DRPT Recommended Preferred Alternative
Area 1: Arlington (1-mile Long Bridge approach)	<ul style="list-style-type: none"> 1A- Add two tracks east of two existing tracks 1B- Add two tracks west of two existing tracks 1C- Add one track east and one track west of two existing tracks <p>*Each alternative results in four total tracks, constructed within existing railroad ROW</p>	Retain Alternatives 1A, 1B, and 1C to support a deferred selection after completion of the Long Bridge Study
Area 2: Northern Virginia (47-mile section)	<ul style="list-style-type: none"> 2A- Add one main track where possible to create fourth track from Crystal City to Alexandria and third track from Alexandria to Spotsylvania. Improvements generally within existing ROW. Realignment of some curves to improve speed. 	Alternative 2A

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Alternative Area	Area- Specific Build Alternatives	DRPT Recommended Preferred Alternative
Area 3: Fredericksburg (14-mile section)	<ul style="list-style-type: none"> 3A- No additional tracks, with minor track improvements to maintain two tracks through town 3B- Add one additional track along existing alignment and east of existing two tracks, including through town 3C- Two-track bypass around the east side of Fredericksburg. Maintain two-track corridor through the city. <p>*Each alternative includes construction of a new Fredericksburg Station</p>	Alternative 3B
Area 4: Central Virginia (29-mile section)	<ul style="list-style-type: none"> 4A- Add one new track for a total of three tracks with improvements to existing tracks 	Alternative 4A
Area 5: Ashland (10-mile section)	<ul style="list-style-type: none"> 5A- Maintain two tracks through town. Construct one additional track north and south of town. Downtown Ashland Station remains 5A-Ashcake- Maintain two tracks through town. Construct one additional track north and south of town. Relocate station to south of Ashcake Road (Ashcake) 5B- Add one additional track to the east of the existing alignment through town, requiring additional ROW. Downtown Ashland Station remains 5B-Ashcake- Add one additional track to the east of the existing alignment through town, requiring additional ROW. Relocate station to Ashcake. 	Additional study of rail capacity improvements. Defer selection of a Recommended Preferred Alternative until the Final EIS. The Town of Ashland/ Hanover County Community Advisory Committee (CAC) has been created to provide greater opportunity for community and stakeholder input.

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Alternative Area	Area- Specific Build Alternatives	DRPT Recommended Preferred Alternative
	<ul style="list-style-type: none"> 5C- Two-track western bypass. Requires new ROW. Existing two-track corridor remains through town. Downtown Ashland Station remains. 5C-Ashcake- Two-track western bypass. Requires new ROW. Existing two-track corridor remains through town. Relocate station to Ashcake. 5D-Ashcake- Add one additional track through town. Center all main line tracks along the existing alignment through town, requiring additional ROW. Relocate station to Ashcake. 	
Area 6: Richmond (23-mile section)	<ul style="list-style-type: none"> 6A-Staples Mill Road Station only. Improve Staples Mill Station to be the only station serving Richmond (close Main Street Station). Construct one main track along Richmond, Fredericksburg & Potomac Railroad Company (RF&P) and A-line through Richmond. Track shifts to improve speed. 6B- A-line Boulevard Station only. Construct Boulevard Station to be the only station serving Richmond (close Main Street and Staples Mill stations). Construct one main track along portions of RF&P and A-line through Richmond. Track shifts to improve speed. 6B- S-line Boulevard Station only. Construct Boulevard Station to be the only station serving Richmond (close Main Street and Staples Mill 	Alternative 6F

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Alternative Area	Area- Specific Build Alternatives	DRPT Recommended Preferred Alternative
	<p>stations). Construct one main track along portions of RF&P and S-line through Richmond. Track shifts to improve speed.</p> <ul style="list-style-type: none"> 6C- Broad Street Station only. Construct Broad Street Station to be the only station serving Richmond (close Main Street and Staples Mill stations). Construct one main track along portions of RF&P and A-line through Richmond. Track shifts to improve speed. 6D- Main Street Station only. Improve Main Street Station to be the only station serving Richmond (close Staples Mill station). Construct one main track along portions of RF&P and S-line through Richmond. Track shifts to improve speed. 6E- Split Service Staples Mill/Main Street Stations. Construct one main track along portions of RF&P and A-line through Richmond. Track shifts to improve speed. Both existing stations remain operational. 6F- Full Service Staples Mill/Main Street Stations. Construct one main track along portions of RF&P and S-line through Richmond. Track shifts to improve speed. Both existing stations remain operational. 6G- Shared Service Staples Mill/Main Street Stations. Construct one main track along portions of RF&P and S-line through Richmond. Track shifts to improve speed. 	

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Alternative Area	Area-Specific Build Alternatives	DRPT Recommended Preferred Alternative
	Both existing stations remain operational.	

DEQ NEPA REVIEW

DEQ has provided recommendations for minimizing potential impacts from the proposed activity and for compliance with applicable legal requirements below. DEQ received extensive comments from some reviewing agencies and affected localities. A summary of the comments is provided below in the Environmental Impacts and Mitigation section. The summary is not meant to substitute for the totality of the comments received and DEQ recommends that the FRA consider every comment, correction, or recommendation detailed in the attached individual comments (see Attachment A: Complete Comments Submitted on DC2RVA DEIS).

ENVIRONMENTAL IMPACTS AND MITIGATION

1. Water Quality and Wetlands. According to the DEIS (page 3-4), streams, floodplains, and wetlands within a 500-foot wide study area centered on the DC2RVA corridor were identified via mapping, photographic, and database resources. Field surveys were conducted from September 2015 to September 2016 to verify the existence of potential ephemeral, intermittent, and perennial streams and wetlands within 100-feet of the existing track, along the side where construction is proposed. The study area includes over 350 rivers, streams, and surface waters and 490.2 total acres of wetlands.

Due to the linear nature and length of this project, each alternative would include unavoidable impacts on water resources (DEIS, page 4-3). Depending on the ultimate combination of build alternative chosen, between 151 and 191 streams would be permanently impacted with linear encroachments to these stream estimated to be between 26,377 and 35,422 linear feet. Permanent impacts to wetlands are estimated to be between 22.14 and 49.64-acres (DEIS, page 4-8).

1(a) Agency Jurisdiction. The State Water Control Board promulgates Virginia's water regulations covering a variety of permits to include the Virginia Pollutant Discharge Elimination System Permit (VPDES) regulating point source discharges to surface waters, Virginia Pollution Abatement Permit regulating sewage sludge, storage and land application of biosolids, industrial wastes (sludge and wastewater), municipal wastewater, and animal wastes, the Surface and Groundwater Withdrawal Permit, and the Virginia Water Protection (VWP) Permit regulating impacts to streams, wetlands, and other surface waters. The VWP permit is a state permit which governs wetlands, surface water, and surface water withdrawals and impoundments. It also serves as §401 certification of the federal Clean Water Act §404 permits for dredge and fill

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1. As Virginia Department of Environmental Quality (DEQ) serves as a clearinghouse for State agencies and locality comments, the FRA and DRPT have reviewed and responded to all the State agency and locality comments provided by DEQ in their Appendix A, as appropriate. In the main body of their comment letter DEQ summarized the substantive comments from the State agencies and localities. For some comments, DRPT responded to DEQ's summary of the comment. In other cases, to avoid repetition, DRPT responded to the more detailed comment and discussion contained in the agency letter attached to DEQ's comment. When practical, DRPT has responded to the comment only once and then referenced this response when the comment was repeated in the attachment to DEQ's comment.

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activities in waters of the U.S. The VWP Permit Program is under the Office of Wetlands and Stream Protection, within the DEQ Division of Water Permitting. In addition to central office staff that review and issue VWP permits for transportation and water withdrawal projects, the six DEQ regional offices perform permit application reviews and issue permits for the covered activities:

- Clean Water Act, §401;
- Section 404(b)(1) Guidelines Mitigation Memorandum of Agreement (2/90);
- State Water Control Law, Virginia Code section 62.1-44.15:20 *et seq.*; and
- State Water Control Regulations, 9 VAC 25-210-10.

1(b) Agency Findings. The disturbance of surface waters or wetlands may require permitting/approval by DEQ and/or the U.S. Army Corps of Engineers (Corps). A VWP permit may be required should impacts to surface waters be necessary. Upon receipt of a Joint Permit Application (JPA) for the proposed surface water impacts, DEQ VWP Permit staff will review the proposed project in accordance with the VWP permit program regulations and current VWP permit program guidance. Refer to section 2(a) below for information on the JPA submittal and review process.

1(c) Agency Recommendations.

- Avoid and minimize impacts to surface waters to the maximum extent practicable; and
- Coordinate with the U.S. Army Corp of Engineers on wetlands impacts.

To minimize unavoidable impacts to wetlands and waterways, DEQ recommends the following practices:

- Operate machinery and construction vehicles outside of stream-beds and wetlands; use synthetic mats when in-stream work is unavoidable.
- Preserve the top 12 inches of material removed from wetlands for use as wetland seed and root-stock in the excavated area.
- Design erosion and sedimentation controls in accordance with the most current edition of the *Virginia Erosion and Sediment Control Handbook*. These controls should be in place prior to clearing and grading, and maintained in good working order to minimize impacts to state waters. The controls should remain in place until the area is stabilized.
- Place heavy equipment, located in temporarily impacted wetland areas, on mats, geotextile fabric, or use other suitable measures to minimize soil disturbance, to the maximum extent practicable.
- Restore all temporarily disturbed wetland areas to pre-construction conditions and plant or seed with appropriate wetlands vegetation in accordance with the cover type (emergent, scrub-shrub, or forested). The applicant should take all appropriate measures to promote re-vegetation of these areas. Stabilization and

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2. through 4. The Project will have unavoidable impacts to water resources, but FRA and DRPT have minimized or avoided impacts to the extent practicable. As noted in Final EIS Section 5.1.5, DRPT anticipates submitting a Joint Permit Application (JPA) for Project impacts to surface waters and wetlands, for review by the US Army Corps of Engineers (USACE), DEQ, Virginia Marine Resource Commission (VMRC), and the Local Wetlands Boards during final design, after funding becomes available and incremental improvements are scheduled. DRPT will incorporate the recommended minimization measures provided by Virginia DEQ in section “1(c) Agency Recommendations” of their letter into the JPA, where appropriate, and in coordination with the USACE and VMRC.

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- restoration efforts should occur immediately after the temporary disturbance of each wetland area instead of waiting until the entire project has been completed.
- Place all materials which are temporarily stockpiled in wetlands, designated for use for the immediate stabilization of wetlands, on mats, geotextile fabric in order to prevent entry in state waters. These materials should be managed in a manner that prevents leachates from entering state waters and must be entirely removed within thirty days following completion of that construction activity. The disturbed areas should be returned to their original contours, stabilized within thirty days following removal of the stockpile, and restored to the original vegetated state.
 - Flag or mark all non-impacted surface waters within the project or right-of-way limits that are within 50 feet of any clearing, grading, or filling activities for the life of the construction activity within that area. The applicant should notify all contractors that these marked areas are surface waters where no activities are to occur.
 - Employ measures to prevent spills of fuels or lubricants into state waters.

1(d) Agency Requirement. Submit a JPA for the proposed impacts to wetlands and surface waters to obtain a VWP Permit as necessary.

2. Subaqueous Lands and Tidal Wetlands. The DEIS (page 4-10) indicates that a small portion of the wetlands in the northern section of the project (along Build Alternatives 1 and 2A) are tidally influenced. Impacts are minimized by spanning waterways and placing as little infrastructure in the waters as possible. The DEIS indicates (pages 4-73) that expanded bridge crossings will require the use of submerged lands for piers or infrastructure. A JPA will be submitted for these impacts.

2(a) Agency Jurisdiction. The Virginia Marine Resources Commission (VMRC) regulates encroachments in, on or over state-owned subaqueous beds as well as tidal wetlands pursuant to Virginia Code § 28.2-1200 through 1400.

The VMRC serves as the clearinghouse for the JPA used by the:

- Corps for issuing permits pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act;
- DEQ for issuance of a VWP permit;
- VMRC for encroachments on or over state-owned subaqueous beds as well as tidal wetlands; and
- local wetlands board for impacts to wetlands.

The VMRC will distribute the completed JPA to the appropriate agencies. Each agency will conduct its review and respond.

2(b) Agency Findings. VMRC did not comment on the proposal.

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(Response to comment 4 on previous page)

5. Comment noted; DRPT did not receive comments directly from VRMC.

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2(c) Agency Requirements. Any activity associated with the proposed project which would result in an encroachment upon or disturbance to state-owned subaqueous beds as well as tidal wetlands below mean low water and/or ordinary high water would require the submittal of a completed JPA to VMRC.

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2(d) Agency Recommendation. Coordinate with VMRC regarding the submittal of a JPA for distribution and review by Federal, State, and local environmental agencies.

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3. Erosion and Sediment Control and Stormwater Management. The DEIS (page 4-3) states that temporary impacts from the project will occur to surface waters due to increased erosion from disturbed areas resulting in increased sedimentation and water turbidity. Long-term impacts may result from increased impervious surfaces. The recommended Preferred Alternative would be designed and constructed in accordance with Virginia Erosion and Sediment Control Law and the Virginia Stormwater Management Act (DEIS, page 4-8).

3(a) Agency Jurisdiction. The DEQ Office of Stormwater Management administers the following laws and regulations governing construction activities:

- Virginia Erosion and Sediment Control (ECS) Law (§ 62.1-44.15:51 *et seq.*) and Regulations (9VAC25-840);
- Virginia Stormwater Management Act (§ 62.1-44.15:24 *et seq.*);
- Virginia Stormwater Management Program (VSMP) regulation (9VAC25-870); and
- 2014 General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (9VAC25-880).

In addition, DEQ is responsible for the Virginia Stormwater Management Program (VSMP) General Permit for Stormwater Discharges from Construction Activities related to Municipal Separate Storm Sewer Systems (MS4s) and construction activities for the control of stormwater discharges from MS4s and land disturbing activities under the Virginia Stormwater Management Program (9VAC25-890-40).

3(b) Agency Requirements.

3(b)(i) Erosion and Sediment Control Annual Specifications and Stormwater Management. In accordance with §62.1-44.15 *et seq.*, electric, natural gas and telephone utility companies, interstate and intrastate natural gas pipeline companies, and railroad companies shall, and authorities created pursuant to § 15.2-5102 may, file general erosion and sediment control standards and specifications annually with DEQ for review and approval. Such standards and specifications shall be consistent with the requirements of this article and associated regulations and the Erosion and Sediment Control Law and Stormwater Management Act (§ 62.1-44.15:24 *et seq.*) and associated regulations where applicable. The specifications shall apply to:

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6. and 7. Refer to DRPT-numbered statements #2 through #4 for response. Additionally, Section 5.1.5 of the Final EIS identifies permit authority by VMRC for activities in, on, or over subaqueous lands in Virginia.
8. DRPT will file erosion and sediment control standards and specifications with DEQ for review and approval in accordance with the Virginia Erosion and Sediment Control (ESC) Law (§ 62.1-44.15:51 *et seq.*), the Virginia Stormwater Management Act (§ 62.1-44.15:24 *et seq.*) and associated regulations, where applicable and as required at the time of submittal, during final design after funding becomes available and incremental improvements are scheduled.

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- Construction, installation, or maintenance of electric transmission, natural gas, and telephone utility lines and pipelines, and water and sewer lines; and
- Construction of the tracks, rights-of-way, bridges, communication facilities, and other related structures and facilities of the railroad company.

3(b)(ii) Erosion and Sediment Control Site-Specific Plans. The owner is responsible for the development, review, and approval of a site-specific erosion and sediment control (ESC) plan in accordance with the approved erosion and sediment control standards and specifications. All regulated land-disturbing activities associated with the project/site, including on and off site access roads, staging areas, borrow areas, stockpiles, and soil intentionally transported from the project, must be covered by the site-specific ESC plan.

3(b)(iii) Stormwater Management Site-Specific Plans. The owner is responsible for the development, review, and approval of a site-specific stormwater management (SWM) plan in accordance with the approved standards and specifications.

3(b)(iv) General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (VAR10). The operator or owner of a construction activity involving land disturbance of equal to or greater than 1 acre is required to register for coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Regulations. General information and registration forms for the General Permit are available at www.deq.virginia.gov/Programs/Water/StormwaterManagement/VSMPPermits/ConstructionGeneralPermit.aspx.

3(c) Agency Recommendations. Consider utilizing permeable paving for parking areas and walkways, where appropriate. Denuded areas should be promptly revegetated following construction.

4. Air Pollution Control. The DEIS (page 4-34) states that implementation of the project will result in increased rail-related emissions due to an increase in train operations each day and a change in equipment. Changes to regional emissions may occur as a result of travelers shifting from one mode of transport to another. Short-term increases in fugitive dust and construction equipment-related emissions will occur as a result of demolition and construction. The DEIS concludes (page 4-39) that the project will not result in significant adverse effects to public health due to air emissions.

4(a) Agency Jurisdiction. The DEQ Air Division, on behalf of the State Air Pollution Control Board, is responsible for developing regulations that implement Virginia's Air Pollution Control Law ([Virginia Code §10.1-1300 et seq.](#)). DEQ is charged with carrying

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(Response to comment 8 on previous page)

- DRPT will develop and submit to DEQ a site-specific ESC plan in accordance with the approved erosion and sediment control standards and specifications, as required at the time of submittal, during final design after funding becomes available and incremental improvements are scheduled. All regulated land-disturbing activities associated with the Project will be covered by the site-specific ESC plan.
- DRPT will develop and submit to DEQ a site-specific stormwater management (SWM) plan in accordance with the approved standards and specifications, as required at the time of submittal, during final design after funding becomes available and incremental improvements are scheduled.
- DRPT will register for coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities and develop a Project-specific stormwater pollution prevention plan (SWPPP), as required at the time of submittal, during final design after funding becomes available and incremental improvements are scheduled.
- DRPT will consider utilizing permeable paving for parking areas and walkways, where practicable, during final design, after funding becomes available and incremental improvements are scheduled. DRPT will revegetate denuded areas, after construction.

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out mandates of the state law and related regulations as well as Virginia's federal obligations under the Clean Air Act as amended in 1990. The objective is to protect and enhance public health and quality of life through control and mitigation of air pollution. The division ensures the safety and quality of air in Virginia by monitoring and analyzing air quality data, regulating sources of air pollution, and working with local, state and federal agencies to plan and implement strategies to protect Virginia's air quality. The appropriate DEQ regional office is directly responsible for the issuance of necessary permits to construct and operate all stationary sources in the region as well as monitoring emissions from these sources for compliance. In the case of certain projects, additional evaluation and demonstration must be made under the general conformity provisions of state and federal law.

The Air Division regulates emissions of air pollutants from industries and facilities and implements programs designed to ensure that Virginia meets national air quality standards. The most common regulations associated with major projects are:

- Open burning: 9 VAC 5-130 *et seq.*
- Fugitive dust control: 9 VAC 5-50-60 *et seq.*
- Permits for fuel-burning equipment: 9 VAC 5-80-1100 *et seq.*

4(b) Agency Findings. According to the DEQ Air Division, the project site is partly located in a designated ozone nonattainment area and an emission control area for oxides of nitrogen (NO_x) and volatile organic compounds (VOCs). Other portions of the project are located in ozone attainment and maintenance areas.

4(c) Recommendation. Precautions should be taken to restrict the emissions of VOCs and NO_x during construction, particularly in Arlington, Fairfax, Prince William, Spotsylvania, Stafford, Alexandria, Fredericksburg, Henrico, Hanover, and Richmond. Construction operations should operate in a manner consistent with air pollution control practices for minimizing emissions, especially during periods of high ozone.

4(d) Requirements.

4(d)(i) Fugitive Dust. During construction, fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 *et seq.* of the *Regulations for the Control and Abatement of Air Pollution*. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

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13. The Draft EIS identified the Washington, DC-MD-VA marginal ozone nonattainment area in Table 3.6-2 and in Figure 3.6-1, and it is reflected in the air quality analysis for the Preferred Alternative (refer to Section 5.6 of the Final EIS).

14. DRPT will take all reasonable precautions during Project construction to limit the emissions of VOC and NO_x. A statement to this effect has been added to Section 5.19 of the Final EIS.

15. Draft EIS Section 4.19.2.3 addresses measures to control fugitive dust during construction, including methods outlined in 9 VAC 5-50-60 *et seq.* of the *Regulations for the Control and Abatement of Air Pollution*. Reference to these regulations has been added to Section 5.19 of the Final EIS.

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4(d)(ii) Open Burning. If project activities include the open burning of construction material or the use of special incineration devices, this activity must meet the requirements under 9 VAC 5-130 *et seq.* of the *Regulations* for open burning, and may require a permit. The *Regulations* provide for, but do not require, the local adoption of a model ordinance concerning open burning. The applicant should contact locality officials to determine what local requirements, if any, exist.

4(d)(iii) Asphalt Paving. A precaution, which typically applies to road construction and paving work (9 VAC 5-45-780 *et seq.*), places limitations on the use of "cut-back" (liquefied asphalt cement, blended with petroleum solvents), and may apply to the project. The asphalt must be "emulsified" (predominantly cement and water with a small amount of emulsifying agent) except when specified circumstances apply. Moreover, there are time-of-year restrictions on its use from April through October in VOC emission control areas.

4(d)(iv) Fuel Burning Equipment. Should the proposed project require the installation of fuel-burning equipment (boilers, generators, etc.), or other air pollution emitting equipment, the project may be subject to 9 VAC 5-80, Article 6, Permits for New and Modified sources.

5. Solid and Hazardous Wastes and Hazardous Materials. According to the DEIS (page 4-26), contaminated sites along the project corridor may affect the project. Areas of contaminated soils are likely to exist along the corridor associated with residual contamination from adjacent industrial uses. Thorough site investigations will be performed to identify contamination associated with the acquisition of ROW and construction. Solid and hazardous wastes will be handled in accordance with applicable federal, state, and local regulations (DEIS, page 4-33).

5(a) Agency Jurisdiction. On behalf of the Virginia Waste Management Board, the DEQ Division of Land Protection and Revitalization is responsible for carrying out the mandates of the Virginia Waste Management Act (Virginia Code §10.1-1400 *et seq.*), as well as meeting Virginia's federal obligations under the Resource Conservation and Recovery Act and the Comprehensive Environmental Response Compensation Liability Act (CERCLA), commonly known as Superfund. The DEQ Division of Land Protection and Revitalization also administers those laws and regulations on behalf of the State Water Control Board governing Petroleum Storage Tanks (Virginia Code §62.1-44.34:8 *et seq.*), including Aboveground Storage Tanks (9VAC25-91 *et seq.*) and Underground Storage Tanks (9VAC25-580 *et seq.* and 9VAC25-580-370 *et seq.*), also known as 'Virginia Tank Regulations', and § 62.1-44.34:14 *et seq.* which covers oil spills.

Virginia:

- Virginia Waste Management Act, Virginia Code § 10.1-1400 *et seq.*
- Virginia Solid Waste Management Regulations, 9 VAC 20-81
 - (9 VAC 20-81-620 applies to asbestos-containing materials)

VIRGINIA DEQ (continued)

16. If open burning or use of incineration devices are to be used during construction, DRPT would comply with 9 VAC 5-130 *et seq.* of the *Regulations* for open burning and coordinate with DEQ and local officials to determine whether permits or other requirements are applicable. A statement to this effect has been added to Section 5.19 of the Final EIS.
17. DRPT will adhere to limitations on the use of "cut-back" during construction consistent with 9 VAC 5-45-780 *et seq.* A statement to this effect has been added to Section 5.19 of the Final EIS.
18. DRPT will adhere to requirements of 9 VAC 5-80, Article 6, Permits for New and Modified Sources, for the installation of fuel-burning equipment or other air pollution generating equipment during construction. A statement to this effect has been added to Section 5.19.2.3 of the Final EIS.

VIRGINIA DEQ (continued)

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- *Virginia Hazardous Waste Management Regulations*, 9 VAC 20-60
 - (9 VAC 20-60-261 applies to lead-based paints)
- *Virginia Regulations for the Transportation of Hazardous Materials*, 9 VAC 20-110.

Federal:

- Resource Conservation and Recovery Act (RCRA), 42 U.S. Code sections 6901 *et seq.*
- U.S. Department of Transportation *Rules for Transportation of Hazardous Materials*, 49 *Code of Federal Regulations*, Part 107
- Applicable rules contained in Title 40, *Code of Federal Regulations*.

5(b) Agency Findings. The DEQ Division of Land Protection and Revitalization (DLPR) conducted a review of solid and hazardous waste databases (Hazardous Waste, RCRA Corrective Action, Federal Facilities, Solid Waste, Virginia Remediation Program (VRP) and Petroleum Release databases) utilizing a 1,000-foot search radius for sites along the project corridor. Four hundred and one (401) sites within the search parameters that may impact the activity were identified. The sites identified include hazardous waste/RCRA facilities, CERCLA sites, solid waste sites, VRP sites, and petroleum release sites. The petroleum release sites were the most numerous with 340 found within the study area, often with multiple incidents recorded at the same address. Refer to the attached memorandum dated October 3, 2017 for a comprehensive list of the sites identified.

5(c) Requirements.

5(c)(i) Waste Management Requirement. Any soil that is suspected of contamination or wastes that are generated during construction must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. All construction and demolition debris must be characterized in accordance with the *Virginia Hazardous Waste Management Regulations* prior to disposal at an appropriate facility. It is the generator's responsibility to determine if a solid waste meets the criteria of a hazardous waste and to manage the waste appropriately.

5(c)(ii) Asbestos-Containing Materials and Lead-Based Paint. All structures being demolished should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to federal waste-related regulations, state regulations 9 VAC 20-80-620 for ACM and 9 VAC 20-60-261 for LBP must be followed.

5(c)(iii) Fuel Storage Tanks. The removal, relocation or closure or installation/operation of any regulated petroleum storage tanks, aboveground storage tank (AST) or underground storage tank (UST), must be conducted in accordance with the requirements of the Virginia Tank Regulations 9VAC 25-91-10 *et seq.* (AST) and / or

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19. Comment noted. DRPT appreciates the list of hazardous materials sites provided by the DEQ Division of Land Protection and Revitalization (DLPR). As described in Draft EIS Section 3.5, a database search was conducted for hazardous materials sites within 500 feet of existing or proposed rail line. Draft EIS Table 3.5-1 lists the databases included in the search and Table 3.5-3 summarizes the sites by type within each of the six alternative areas. Maps in Draft EIS Appendix O show the locations of the sites and tables in Draft EIS Appendix O provide information on individual sites. As noted in Section 3.5.3 of the Draft EIS, the search revealed 1,034 mapped hazardous materials sites/facilities within the study area, most of which (702) are either Petroleum Registered Facilities or Petroleum Release Sites. Finally, further investigation of hazardous material sites/facilities that could potentially be affected by the Project will be completed in a Phase I Environmental Site Assessment (ESA) that will occur prior to any property acquisition.

Final EIS Section 5.5.1 describes potential hazardous materials sites impacts based on limits of disturbance for the Preferred Alternative, which have been updated since the Draft EIS. Appendix M of the Final EIS also provides updated mapping of the critical hazardous materials sites in relation to the Preferred Alternative limits of disturbance.

(Responses are continued on next page)

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- *Virginia Hazardous Waste Management Regulations*, 9 VAC 20-60
 - (9 VAC 20-60-261 applies to lead-based paints)
- *Virginia Regulations for the Transportation of Hazardous Materials*, 9 VAC 20-110.

Federal:

- Resource Conservation and Recovery Act (RCRA), 42 U.S. Code sections 6901 *et seq.*
- U.S. Department of Transportation *Rules for Transportation of Hazardous Materials*, 49 *Code of Federal Regulations*, Part 107
- Applicable rules contained in Title 40, *Code of Federal Regulations*.

5(b) Agency Findings. The DEQ Division of Land Protection and Revitalization (DLPR) conducted a review of solid and hazardous waste databases (Hazardous Waste, RCRA Corrective Action, Federal Facilities, Solid Waste, Virginia Remediation Program (VRP) and Petroleum Release databases) utilizing a 1,000-foot search radius for sites along the project corridor. Four hundred and one (401) sites within the search parameters that may impact the activity were identified. The sites identified include hazardous waste/RCRA facilities, CERCLA sites, solid waste sites, VRP sites, and petroleum release sites. The petroleum release sites were the most numerous with 340 found within the study area, often with multiple incidents recorded at the same address. Refer to the attached memorandum dated October 3, 2017 for a comprehensive list of the sites identified.

5(c) Requirements.

5(c)(i) Waste Management Requirement. Any soil that is suspected of contamination or wastes that are generated during construction must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. All construction and demolition debris must be characterized in accordance with the *Virginia Hazardous Waste Management Regulations* prior to disposal at an appropriate facility. It is the generator's responsibility to determine if a solid waste meets the criteria of a hazardous waste and to manage the waste appropriately.

5(c)(ii) Asbestos-Containing Materials and Lead-Based Paint. All structures being demolished should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to federal waste-related regulations, state regulations 9 VAC 20-80-620 for ACM and 9 VAC 20-60-261 for LBP must be followed.

5(c)(iii) Fuel Storage Tanks. The removal, relocation or closure or installation/operation of any regulated petroleum storage tanks, aboveground storage tank (AST) or underground storage tank (UST), must be conducted in accordance with the requirements of the Virginia Tank Regulations 9VAC 25-91-10 *et seq.* (AST) and / or

VIRGINIA DEQ (continued)

20. to 23. DRPT will comply with the requirements for solid and hazardous wastes and hazardous materials specified by DEQ during construction. Section 5.5.2 of the Final EIS addresses the testing, removal and disposal of solid waste and hazardous waste during construction in accordance with the Virginia Solid Waste Management Regulations and Virginia Hazardous Waste Management Regulations. Prior to the acquisition of right-of-way and construction, thorough site investigations will be conducted, as required, to determine whether any of the sites are contaminated, and, if so, the nature and extent of that contamination. Any additional hazardous material sites discovered during construction will be removed and disposed of in compliance with all applicable federal, state, and local regulations. All structures being demolished, renovated, and/or removed will be inspected for asbestos containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations, state regulations for ACM and for LBP will be followed. All necessary remediation will be conducted in compliance with applicable federal, state, and local environmental laws and will be coordinated with the EPA, DEQ, and other federal or state or local agencies as necessary.

VIRGINIA DEQ (continued)

(Response to comments 22 and 23 on previous page)

24. DRPT will reduce, reuse, and recycle solid waste generated by the Project to the extent practicable. See response to comment #19 regarding the database search for hazardous materials sites reported in the Draft EIS and the Phase I ESA investigation that will be conducted prior to any property acquisition.

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9VAC 25-580-10 *et seq.* (UST).

5(c)(iv) Petroleum Release Sites. If evidence of a petroleum release is discovered during implementation of this project, it must be reported to DEQ, as authorized by Virginia Code § 62.1-44.34.8 through 9 and 9 VAC 25-580-10 *et seq.*

5(d) Agency Recommendation. DEQ recommends that the applicant implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

Information related to hazardous waste and RCRA/CERCLA sites may be accessed from the following EPA websites:

- <https://www3.epa.gov/enviro/>
- <https://rcrainfopreprod.epa.gov/rcrainfoweb/action/main-menu/view>
- <https://www.epa.gov/superfund>

Information related to the identified petroleum release sites (pollution complaint- PC cases) should be further evaluated by the project engineer to determine the location, nature, and extent of the petroleum release and the potential for it to impact the project. Coordinate with the Tanks Program at the appropriate DEQ Regional Office for more information:

Northern Regional Office (NRO): (703) 583-3800
Piedmont Regional Office (PRO): (804) 527-5020

Due to the historical uses of the project corridor, all necessary precautions should be taken to avoid or minimize potential environmental/health risks. For any petroleum contaminated soil/groundwater that are encountered during the sub-surface phases of this project, contact the local Fire Marshall with any personal safety concerns.

6. Natural Heritage Resources. The DEIS (page 4-68) concludes that depending on the build alternatives chosen, between 31 and 264 acres of habitat are estimated to be permanently lost due to conversion of existing land into railroad structures and maintained ROW. Due to the length and linear nature of the project, impacts to habitat would be unavoidable although all practicable measures will be taken to avoid and minimize the impacts. Habitats that would be affected are those adjacent to the existing rail line and are already affected by railway activities, with the exception of the bypass routes. Station upgrades would occur in urban areas and are not expected to impact significant habitat.

The bypass routes would permanently convert greater areas of habitat and forested areas would be bisected (DEIS, pages 4-70- 4-71). The Fredericksburg Bypass (Build Alternative 3C) crosses an area of over 1,200 acres of continuous forest southwest of the Rappahannock River. The Ashland Bypass (Build Alternatives 5C and 5C-Ashcake)

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crosses several wildlife corridors associated with waterways and three tracts of forested habitats (approximately 140, 380, and 180 acres in size).

6(a) Agency Jurisdiction.

- (i) The Virginia Department of Conservation and Recreation's (DCR) Division of Natural Heritage (DNH). DNH's mission is conserving Virginia's biodiversity through inventory, protection and stewardship. The Virginia Natural Area Preserves Act (Virginia Code §10.1-209 through 217), authorized DCR to maintain a statewide database for conservation planning and project review, protect land for the conservation of biodiversity, and the protect and ecologically manage the natural heritage resources of Virginia (the habitats of rare, threatened and endangered species, significant natural communities, geologic sites, and other natural features).
- (ii) The Virginia Department of Agriculture and Consumer Services (VDACS): The Endangered Plant and Insect Species Act of 1979 (Virginia Code Chapter 39 §3.1-1020 through 1030) authorizes VDACS to conserve, protect and manage endangered and threatened species of plants and insects. Under a Memorandum of Agreement established between VDACS and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species.

6(b) Agency Findings. DCR DNH searched its Biotics Data System (Biotics) for occurrences of natural heritage resources in the vicinity of the project area. The site-specific results are summarized below. See the attached DCR memorandum dated October 11, 2017 for greater detail.

Alexandria Quad

Biotics historically documents the presence of natural heritage resources within two miles of the project area. However, due to the scope of the activity and the distance to the resources, DCR does not anticipate that this project will adversely impact these natural heritage resources.

Quantico, Guinea, Occoquan, Bowling Green, Ashland, Glen Allen, Ruther Glen, and Yellow Tavern Quads

Biotics documents the presence of natural heritage resources within two miles of the project area. However, due to the scope of the activity and the distance to the resources, DCR does not anticipate that this project will adversely impact these natural heritage resources.

Annandale Quad

According to information currently in Biotics, the Rusty patched bumble bee (*Bombus affinis*, G1/S1/LE/NL) has been historically documented within two miles of the project area. The Rusty patched bumble bee is listed as endangered under the Endangered

VIRGINIA DEQ (continued)

- 25. Refer to the referenced attached Virginia Department of Conservation and Recreation (DCR) memorandum (DRPT-numbered statements #103 through #126) for responses to detailed comments that are summarized here.

VIRGINIA DEQ (continued)

(Response to comment 25 on previous page)

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Species Act by U.S. Fish and Wildlife Service (USFWS) effective March 21, 2017. Threats to the Rusty patched bumble bee include disease, pesticides, climate change, habitat loss and small population dynamics.

Fort Belvoir Quad

According to the information currently in DCR DNH's files, the Marumsc Conservation Site is located downstream of the project site. Marumsc Conservation Site has been given a biodiversity significance ranking of B5, which represents a site of moderate significance. The natural heritage resource of concern at this site is the *Somatochlora filose* (Fine-lined emerald, G5/S2/NL/NL), a state-listed rare dragonfly species. Because of their aquatic lifestyle and limited mobility, the larvae are particularly vulnerable to shoreline disturbances that cause the loss of shoreline vegetation and siltation. They are also sensitive to alterations that result in poor water quality, aquatic substrate changes, and thermal fluctuations.

Stafford Quad

According to the information currently in Biotics, the Crow's Nest Conservation Site is located within two miles of the project site. Crow's Nest Conservation Site has been given a biodiversity significance ranking of B2, which represents a site of very high significance. The natural heritage resource of concern at this site is the Tidal Freshwater Marsh (Mixed High Marsh Type, G3/S4?/NL/NL).

The Crow's Nest Natural Area Preserve is located downstream from the project site.

Fredericksburg Quad

According to the information currently in Biotics, the South Fredericksburg Conservation Site is located within two miles of the project site. The South Fredericksburg Conservation Site has been given a biodiversity significance ranking of B2, which represents a site of very high significance. The natural heritage resource of concern at this site is the Non-Riverine Wet Hardwood Forest (Northern Coastal Plain type, G2?/S2?/NL/NL)

In addition, the Hazel Run Rt. 1 to Rt. 2 Stream Conservation Unit (SCU) is located downstream from the project site. The Hazel Run Rt. 1 to Rt. 2 SCU has been given a biodiversity ranking of B3, which represents a site of high significance. The natural heritage resources associated with this site are:

Aquatic Natural Community (NP-Lower Rappahannock Second Order Stream)
G2?/S2?/NL/NL
Aquatic Natural Community (NC-Lower Rappahannock Second Order Stream)
G2G3/S2S3/NL/NL

Threats to the significant Aquatic Natural Communities and the surrounding watershed include water quality degradation related to point and non-point pollution, water withdrawal and introduction of non-native species.

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In addition, Yellow lance (*Elliptio lanceolata*, G2G3/S2S3/SOC/NL) occurs in mid-sized rivers and second and third order streams. This species is currently classified as a species of concern by the USFWS however this designation has no official legal status.

Ashland and Hanover Academy Quads

According to the information currently in Biotics, the South Anna River – Falling Creek Stream Conservation Unit (SCU) is located downstream from the project site. The South Anna River – Falling Creek SCU has been given a biodiversity ranking of B3, which represents a site of high significance. The natural heritage resources associated with this site are:

Elliptio lanceolata (Yellow lance), G2G3/S2S3/SOC/NL
Aquatic Natural Community (NP-Pamunkey Third Order Stream), G2/S2/NL/NL

Threats to the significant Aquatic Natural Community and the surrounding watershed include water quality degradation related to point and non-point pollution, water withdrawal and introduction of non-native species.

Additionally, Green floater (*Lasmigona subviridis*, G3/S2/NL/LT), a rare freshwater mussel, has been historically documented downstream of the project site in the South Anna River. This species has been listed as state threatened by the Department of Game and Inland Fisheries (DGIF).

Richmond and Drewry's Bluff Quads

According to information currently in Biotics, there are records for Laura's clubtail (*Stylurus laurae*, G4/S2/NL/NL), a state rare dragonfly, across the Piedmont and west to the Ridge and Valley region. Threats include activities that alter the water flow or substrate such as: impoundments, channelization, dredging, siltation, agricultural non-point pollution, and municipal and industrial pollution.

According to DCR's species distribution model, potential may exist for the Dwarf wedgemussel (*Alasmodonta heterodon*, G1G2/S1/LE/LE) to be found within the project area or adjacent to the project area in the Fort Belvoir and Fredericksburg Quads.

State-listed Plant and Insect Species

The current activity will not affect any documented state-listed plants or insects.

6(c) Recommendations.

Annandale Quad

DCR recommends the implementation of the following USFWS voluntary measures for the conservation of the Rusty patched bumble bee: avoid pesticide use, avoid herbicide use, and plant native flowers that bloom throughout the spring and summer to support pollinator habitat.

VIRGINIA DEQ (continued)

(For response to comment 25, refer to pages B-74)

26. DRPT does not anticipate use of pesticides or herbicides as part of Project construction or operating the proposed additional intercity passenger trains. As noted in Section 5.10.3.2 of the Final EIS, during construction, DRPT will reduce the likelihood of adverse effects to rare, threatened and endangered species, and other wildlife through reseeding of disturbed areas with native plants.

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Stafford Quad

DCR recommends coordination with Mike Lott, DCR - Division of Natural Heritage Northern Region Steward at (540) 658-8690 or Michael.lott@dcv.virginia.gov for additional information about the Crow's Nest Natural Area Preserve, located downstream from the project site, and associated natural heritage resources.

Ashland and Hanover Academy Quads

To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations, establishment/enhancement of riparian buffers with native plant species and maintaining natural stream flow.

Richmond and Drewry's Bluff Quads

To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations, establishment/enhancement of riparian buffers with native plant species and maintaining natural stream flow.

General Recommendation

Contact DCR DNH to secure updated information on natural heritage resources if the scope of the project changes and/or six months has passed before it is utilized. New and updated information is continually added to the Biotics Data System.

6(d) Additional Information. The Virginia Department of Game and Inland Fisheries (DGIF) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or by contacting Ernie Aschenbach at 804-367-2733 or via email at Ernie.Aschenbach@dgif.virginia.gov.

7. Recreational Resources, Scenic Rivers and Byways. The Fredericksburg bypass option (Alternative 3C) would require a new bridge across the Rappahannock River. However, the bridge would not be located in an area where the river is designated as a State Scenic River. The State Scenic River designation ends north of the proposed bypass (DEIS, page 4-6). The DEIS does not indicate that Scenic Byways will be impacted. To minimize visual impacts, in general, new bridges and buildings will reflect the profiles of existing bridges and structures (DEIS, page 4-68).

7(a) Agency Jurisdiction. The DCR Division of Planning and Recreational Resources provides policy and direction to the public and private sectors to improve the management of recreational resources (in addition to outdoor and open spaces), and addresses issues related to scenic rivers, highways and byways.

VIRGINIA DEQ (continued)

27. DRPT does not anticipate the need for further coordination with DCR concerning the Crow's Nest Natural Area preserve; however, DRPT will coordinate as recommended, if required.
28. and 29. As noted in Section 5.1.6.3 of the Final EIS, DRPT will implement appropriate erosion and sediment control practices as required, in accordance with the Virginia Erosion and Sediment Control Regulations and the Virginia Stormwater Management Law and regulations.
30. DRPT will coordinate with resource agencies to obtain updated sensitive resources information in the event of significant changes in Project scope and during final design, after funding becomes available and incremental improvements are scheduled.
31. DRPT searched VDGIF's Virginia Fish and Wildlife Information Service (VaFWIS) as part of the Draft EIS inventory of wildlife resources (see Draft EIS Section 3.10.5).

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7(b) Agency Findings. The DCR Division of Planning and Recreational Resources identified a number of corrections or additions to be made in the document. In the Purpose and Need section (02-26), DCR states that although some impacts to parks and trails are recognized, the document fails to describe adequately mitigation opportunities, including a continuous, associated non-motorized trail network between, at minimum, Leesylvania State Park and Falmouth and the need for crossings that meet Americans with Disabilities Act (ADA) guidelines.

Section 4.15.2.2 discusses the effects on bicycle and pedestrian safety. DCR notes that there have been a number of bicyclist and pedestrian accidents and fatalities along the East Coast Greenway and recommend that the EIS consider how this project can help address bicyclist and pedestrian safety particularly in the Northern Virginia and George Washington regions.

In reference to Section 03-182 (Affected Environment), DCR notes that portions or perhaps all of Leesylvania State Park is protected in perpetuity by section 6(f) (3) of the Land and Water Conservation Fund Act. Section 6 (f) (3) of the Land & Water Conservation Fund Act (LWCF) states that: "No property acquired or developed with assistance under this section shall without approval of the Secretary [of the Interior] be converted to other than public outdoor recreation uses". The LWCF program realizes that in certain instances there is no alternative to converting a portion of a LWCF property.

Richmond Quad

This project is within a portion of the James River that has been designated as a scenic river.

7(c) Agency Recommendations. Incorporate into the EIS (Section 4.15.2.2) how this project can help address bicyclist and pedestrian safety particularly in the Northern Virginia and George Washington regions. At a minimum, DCR recommends that this project consider the health impact of not providing a safe corridor for bicyclists and pedestrians through this heavily congested, dangerous area by providing a shared-use path alongside the rail corridor.

In instances where there is no feasible alternative to converting a 6(f)(3) LWCF property, a conversion of use process must be initiated with DCR for approval from the National Park Service. The conversion of use process requires that a suitable piece of replacement property be found before a conversion occurs at a LWCF protected site (Leesylvania State Park). "Suitable" means equivalent in fair market value and can serve as a viable public outdoor recreation area without reliance upon adjoining or additional areas. Conversion of use processes must be initiated with DCR by the governmental body that owns the property. Coordinate with Synthia Waymack at synthia.waymack@dcr.virginia.gov to fully understand the requirements of conversion under this program.

VIRGINIA DEQ (continued)

32. As discussed throughout the Draft and Final EIS documentation, the addition of one track will primarily be within the existing CSXT right-of-way. DRPT will preserve the continuity of all trail crossings by extending the existing crossing over the new track (provided in-kind, to the current design specifications). Additional vehicle and pedestrian warning devices will be modified, as appropriate, for the new track and any change in authorized track speed. The details of these will be determined during final design after funding becomes available and incremental improvements are scheduled.

DRPT has not identified any impacts to the trail system which would require the addition of a greenway along the corridor from Leesylvania State Park to Falmouth as a mitigation measure.

33. Addressing bicyclist and pedestrian safety specifically on the East Coast Greenway is beyond the Purpose and Need of the DC2RVA Project, however, the DC2RVA Project will address and improve, as necessary, bike/pedestrian safety warning devices at all public crossings along the DC2RVA rail corridor, in keeping with the Project's Basis of Design and applicable FRA, Amtrak, CSXT, and VDOT safety standards.

34. No property will need to be acquired from Leesylvania State Park as part of the Preferred Alternative.

35. DRPT concurs; scenic rivers are presented in Section 3.1.3.2 of the Draft EIS. Potential effects on scenic rivers for the Preferred Alternative are presented in Section 5.1.1 of the Final EIS.

(Responses are continued on next page)

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7(b) Agency Findings. The DCR Division of Planning and Recreational Resources identified a number of corrections or additions to be made in the document. In the Purpose and Need section (02-26), DCR states that although some impacts to parks and trails are recognized, the document fails to describe adequately mitigation opportunities, including a continuous, associated non-motorized trail network between, at minimum, Leesylvania State Park and Falmouth and the need for crossings that meet Americans with Disabilities Act (ADA) guidelines.

Section 4.15.2.2 discusses the effects on bicycle and pedestrian safety. DCR notes that there have been a number of bicyclist and pedestrian accidents and fatalities along the East Coast Greenway and recommend that the EIS consider how this project can help address bicyclist and pedestrian safety particularly in the Northern Virginia and George Washington regions.

In reference to Section 03-182 (Affected Environment), DCR notes that portions or perhaps all of Leesylvania State Park is protected in perpetuity by section 6(f) (3) of the Land and Water Conservation Fund Act. Section 6 (f) (3) of the Land & Water Conservation Fund Act (LWCF) states that: "No property acquired or developed with assistance under this section shall without approval of the Secretary [of the Interior] be converted to other than public outdoor recreation uses". The LWCF program realizes that in certain instances there is no alternative to converting a portion of a LWCF property.

Richmond Quad

This project is within a portion of the James River that has been designated as a scenic river.

7(c) Agency Recommendations. Incorporate into the EIS (Section 4.15.2.2) how this project can help address bicyclist and pedestrian safety particularly in the Northern Virginia and George Washington regions. At a minimum, DCR recommends that this project consider the health impact of not providing a safe corridor for bicyclists and pedestrians through this heavily congested, dangerous area by providing a shared-use path alongside the rail corridor.

In instances where there is no feasible alternative to converting a 6(f)(3) LWCF property, a conversion of use process must be initiated with DCR for approval from the National Park Service. The conversion of use process requires that a suitable piece of replacement property be found before a conversion occurs at a LWCF protected site (Leesylvania State Park). "Suitable" means equivalent in fair market value and can serve as a viable public outdoor recreation area without reliance upon adjoining or additional areas. Conversion of use processes must be initiated with DCR by the governmental body that owns the property. Coordinate with Synthia Waymack at synthia.waymack@dcr.virginia.gov to fully understand the requirements of conversion under this program.

VIRGINIA DEQ (continued)

36. Provision of a new shared use path within the railroad right-of-way is beyond the Purpose and Need of the Project and CSXT policies currently do not allow recreational uses within their right-of-way. As indicated in Section 5.15.2.2 of the Final EIS, all existing bicycle and pedestrian facilities will be maintained (provided in-kind) as part of the Build Alternatives and will be designed to current safety standards. Opportunities for additional bicycle and pedestrian accessibility improvements, including updates to facilities to meet Americans with Disabilities Act of 1990 (ADA) requirements, could be incorporated during final design in coordination with FRA, after funding becomes available and incremental improvements are scheduled.
37. Replacement requirements for conversion of Section 6(f) lands as part of the Preferred Alternative are addressed in Section 5.14.1 of the Final EIS. As indicated in that section, DRPT does not anticipate permanent impacts to Section 6(f) lands for any Build Alternatives, including the Preferred Alternative as identified in the Final EIS. Temporary impacts during Project construction will not require replacement lands.

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Due the Richmond Quad being located within a portion of the James River that has been designated a scenic river, if there is any change to the existing tracks that cross the James, contact Lynn Crump of the DCR-Division of Planning and Recreation at 804-786-5054 or via email at Lynn.Crump@dcv.virginia.gov to coordinate further.

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8. State Parks. The DEIS (page 4-155) states that seventeen parkland and trail resources could be impacted by the implementation of this project. Permanent impacts would occur to six of the facilities. Permanent impacts are expected to the following resources (will vary depending on the build alternatives chosen): Long Bridge Park, Dog Run Park at Carlyle, Ashland Trolley Line, Carter Park, Gates Mill Park, Walker's Creek Retention Basin Park. Temporary impacts are expected to the following Section 6(f) resources: George Washington Memorial Parkway, Fredericksburg and Spotsylvania National Military Park, and Pierson/ Slaughter Pen Farm. Impacts to parklands were avoided and minimized to the maximum extent possible. The project sponsor will coordinate with park owners over impacts.

8(a) Agency Jurisdiction. DCR's Division of State Parks is responsible for acquiring, and managing, state parks. Park development and master planning are managed by the Division of Planning and Recreation Resources. Master plans are required prior to a parks opening and are updated every ten years (Virginia Code § 10.1-200 *et seq.*).

8(b) Agency Recommendation. Since this project has the potential to impact Leesylvania and Widewater State Parks, DCR recommends coordination with State Parks Division Director, Craig Seaver at Craig.Seaver@dcv.virginia.gov regarding these impacts.

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9. Historic Impacts. The DEIS (page 4-129) indicates that consultation between DHR and the project sponsor commenced in the fall of 2014 and is ongoing. DPRT defined an Area of Potential Effect (APE) and the State Historic Preservation Office (SHPO) concurred on the APE in 2015. One hundred and fifty-eight historic properties were identified within the APE along with two National Register of Historic Places (NRHP) and ten NRHP-eligible archaeological sites. Archaeological studies have been completed along all project alternatives except for the bypass options. The DEIS concludes (page 4-155) that 33 historic properties would be adversely affected by one or more of the project build alternatives. When an adverse effect has been identified, efforts will be undertaken to avoid, mitigate, or minimize the impacts. A Programmatic Agreement (PO) is under development with the SHPO to identify studies that will be necessary once the recommended Preferred Alternative has been selected and tasks that would be undertaken to mitigate adverse effects.

9(a) Agency Jurisdiction. The Department of Historic Resources (DHR) conducts reviews of projects to determine their effect on historic structures or cultural resources under its jurisdiction. DHR, as the designated State's Historic Preservation Office, ensures that federal actions comply with Section 106 of the National Historic Preservation Act of 1962 (NHPA), as amended, and its implementing regulation at 36

VIRGINIA DEQ (continued)

38. DRPT will coordinate with DCR regarding bridge design at scenic river crossings during final design, after funding becomes available and incremental improvements are scheduled. As discussed in Section 5.1.1.1 of the Final EIS, new bridges will generally reflect the horizontal and vertical profiles of existing structures and therefore DRPT anticipates that the landscape and viewsheds from scenic rivers will be similar in context to existing conditions.
39. Table 5.14-1 of the Final EIS identifies the permanent and temporary impacts of the Preferred Alternative to parkland resources. Leesylvania and Widewater State Parks are not among the parklands affected by the Preferred Alternative, either for temporary or permanent use.

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CFR Part 800. The NHPA requires federal agencies to consider the effects of federal projects on properties that are listed or eligible for listing on the National Register of Historic Places. Section 106 also applies if there are any federal involvements, such as licenses, permits, approvals or funding. DHR also provides comments to DEQ through the state environmental impact report review process.

9(b) Agency Finding. The Federal Railroad Authority and the Department of Rail and Public Transportation have both been working closely with DHR pursuant to Section 106 of the National Historic Preservation Act on this project. DHR anticipates that both agencies will continue to coordinate per Section 106.

9(c) Agency Requirement. DHR requests that the FRA continue to consult directly with DHR, as necessary, pursuant to Section 106 of the National Historic Preservation Act (as amended) and its implementing regulations codified at 36 CFR Part 800 which require Federal agencies to consider the effects of their undertakings on historic properties.

10. Public Water Supply. The DEIS (page 4-12) states that new permanent and temporary impacts within the wellhead protection zones for public and private wells would result from the DC2RVA project. Prior to construction commencing the sponsor will evaluate the potential for groundwater contamination to occur.

10(a) Agency Jurisdiction. The Virginia Department of Health (VDH), Office of Drinking Water (ODW) reviews projects for the potential to impact public drinking water sources (groundwater wells and surface water intakes). VDH administers both federal and state laws governing waterworks operation.

10(b) Agency Findings. VDH-ODW reviewed the project corridor for proximity to public drinking water sources including groundwater wells, springs and surface water intakes.

The following public groundwater wells are located within a 1-mile radius of the project site (wells within a 1,000-foot radius are formatted in **bold**):

PWS ID Number	City/County	System Name	Facility Name
6153765	PRINCE WILLIAM	TIM'S RIVERSHORE RESTAURANT	WELL #2 DRILLED 2011
6033362	CAROLINE	NPS - JACKSON SHRINE	DRILLED WELL
4087098	HENRICO	BUBBAS BAR AND GRILL	WELL NO. 2 (BORED)
4085129	HANOVER	CALVARY PENTECOSTAL CAMP	WELL #6
4085129	HANOVER	CALVARY PENTECOSTAL CAMP	WELL #5
4085920	HANOVER	RHAPSODY	DRILLED WELL

VIRGINIA DEQ (continued)

40. and 41. Close consultation with the Virginia Department of Historic Resources (DHR) commenced in November 2014. Pursuant to Section 106 of the National Historic Preservation Act (as amended), DRPT will continue to coordinate all cultural resource components with DHR during final design, after funding becomes available and incremental improvements are scheduled.

42. Refer to DRPT-numbered statements #129 through #131 for detailed lists provided by Virginia Department of Health (VDH), and DRPT's responses.

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6033495	CAROLINE	MICHAEL D. DENT INDUSTRIAL PARK	WELL 8B
6033490	CAROLINE	MATTAPONI SPRINGS GOLF COURSE	DRILLED WELL
6033500	CAROLINE	MILFORD SANITARY DISTRICT	WELL 2
6179630	STAFFORD	POTOMAC POINT WINERY	WELL 1
6059505	FAIRFAX COUNTY	FAIRFAX YACHT CLUB	FX YACHT CLUB DRILLED WELL

The following surface water intakes are located within a 5-mile radius of the project site:

PWS ID Number	System Name	Facility Name
6059501	FAIRFAX COUNTY WATER AUTHORITY	OCCOQUAN RESERVIOR INTAKE
6179100	STAFFORD COUNTY UTILITIES	AQUIA CREEK
6153675	QUANTICO MARINE BASE-MAINSIDE	BRECKINRIDGE RE
6177300	SPOTSYLVANIA COUNTY UTILITIES	RAPPAHANNOCK RIVER INTAKE
6177300	SPOTSYLVANIA COUNTY UTILITIES	MOTTS RUN RESERVOIR - ALT INTAKE
6033425	LAKE CAROLINE	STEVENS MILL RN
4085398	HANOVER SUBURBAN WATER SYSTEM	NORTH ANNA RWI
4760100	RICHMOND, CITY OF	RAW WATER INTAKE

The project is within the watershed of the following public surface water sources (facilities where the project falls within 5 miles of the intake **and** is within the intake's watershed are formatted in **bold**):

PWS ID Number	System Name	Facility Name
4085398	HANOVER SUBURBAN WATER SYSTEM	NORTH ANNA RWI
3700500	NEWPORT NEWS, CITY OF	CHICKAHOMINY R
3670800	VIRGINIA-AMERICAN WATER CO	APPOMATTOX RIVER

10(c) Agency Recommendation. Utilize Best Management Practices including Erosion and Sedimentation Controls and Spill Prevention Controls & Countermeasures on the project site. Field mark well(s) within a 1,000-foot radius from the project site to protect them from accidental damage during construction. Properly manage material on site and during transport to prevent impacts to nearby surface waters.

VIRGINIA DEQ (continued)

(Response to comment 42 on previous page)

43. As noted in Section 5.1.6.3 of the Final EIS, appropriate erosion and sediment control practices will be implemented during construction in accordance with the Virginia Erosion and Sediment Control Regulations and the Virginia Stormwater Management Law and regulations. During construction, wells within or adjacent to the Project Limits of Disturbance (LOD) will be field marked to protect them from accidental damage.

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10(d) Requirement. Potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the local utility.

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11. Septic Tanks and Drainfield Regulations. The DEIS does not indicate that private on-site sewage systems will be affected.

11(a) Agency Jurisdiction. The mission of the VDH Onsite Sewage and Water Services is to protect public health and ground water quality. This is best achieved by implementing an onsite wastewater program based on sound scientific, engineering, and public health principles.

11(b) Agency Findings. The VDH Office of Environmental Health Services (OEHS) Onsite Sewage and Water Services reviewed the proposal and states that local health districts can provide available electronic information regarding the location of private wells and sewage systems near the proposed project area. VDH does not have an accurate estimate of the number of private wells or septic systems in the project area.

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From the 250-acre Acca Yard in Henrico County (CSXT's major transfer point in Virginia) to Parham Road and points north, the project is mostly near areas served by public water and sewer; however, older wells or septic systems might still be in use or present (and not used). From Parham Road North to the Chickahominy River crossing into Hanover County, and parallel to Old Washington Highway, the project is near areas primarily served by private wells and septic systems (e.g., Classic Catering and Hunton Park). The projected rail line covers about 22 linear miles through Chesterfield County and the south side of the James River in the City of Richmond. For construction within the City of Richmond, staff notes there are several churches and schools within or near the project area. In the Hanover County project area, staff estimates that a few hundred wells and onsite sewage systems will be near the project area.

11(c) Agency Recommendation. OEHS recommends that the consultant contact each local health department in the project area, to the extent possible, to obtain appropriate records and ensure the project will not negatively impact private wells and onsite sewage systems.

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Staff recommends that information be shared with the local communities and that appropriate points of contact be made available. If water, sewer, electricity, or other utility service might be impacted, then the local community should be informed in advance with accommodations provided as necessary.

11(d) Agency Requirement. Property owners must submit an application to the local health department to relocate any onsite sewage system impacted by the construction.

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12. Open Space. According to the DEIS (page 3-80), the Fredericksburg bypass route build alternative bisects two Virginia Outdoors Foundation (VOF) properties totaling

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VIRGINIA DEQ (continued)

44. DRPT will coordinate with local utilities to identify potential impacts to public water distribution systems or sanitary sewage collection systems during final design, after funding becomes available and incremental improvements are scheduled.
45. DRPT will contact local health districts to identify locations of private wells and sewage systems within the Limits of Disturbance during final design, after funding becomes available and incremental improvements are scheduled. The number of churches and schools within 500 feet of the DC2RVA rail line are listed for each jurisdiction in Table 3.11-5 of the Draft EIS. Among the listed facilities are 13 religious facilities and 10 schools within the City of Richmond.
46. See response to DRPT-numbered statement #45. Prior to construction, DRPT will inform local communities regarding utility impacts and will develop appropriate measures to minimize or mitigate impacts to the community, in coordination with local health departments.
47. During final design, after funding becomes available and incremental improvements are scheduled, DRPT will submit an application to the local health department to relocate any onsite sewage system that will be impacted by construction.

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approximately 894-acres and comes within 1,000-feet of a third property. Permanent impacts to 1.22-acres of VOF Conservation Area CLN-VOF-3804 and 21.09-acres of VOF Conservation Area CLN-VOF-03850 are anticipated, along with temporary impacts to more acreage (DEIS, page 4-71). Coordination with VOF may be necessary.

12(a) Agency Jurisdiction. The Virginia Outdoors Foundation (VOF) was created by the General Assembly in 1966 and established in the Code of Virginia under § 10.1-1800, which states: "The Virginia Outdoors Foundation is established to promote the preservation of open-space lands and to encourage private gifts of money, securities, land or other property to preserve the natural, scenic, historic, scientific, open-space and recreational areas of the Commonwealth. The Virginia Outdoors Foundation is a body politic and shall be governed and administered by a board of trustees composed of seven trustees from the Commonwealth at large to be appointed by the Governor for four-year terms."

12(b) Agency Comments. The project is located in a region that does not contain a high concentration of open-space easements due to the urbanized nature of the existing rail corridor, U.S. Route 1, and I-95. Along the existing and preferred alignments for Area 3 (Fredericksburg), VOF does not hold any open-space easements within 1.5 miles of the corridor, nor is it working on any new open-space easement proposals within that 1.5 miles of the corridor.

However, Build Alternative 3C (two-track bypass east of Fredericksburg) would cross two open-space easements in Caroline County and come within 1.5-miles of two additional easements in Spotsylvania County. An open-space easement is a legal interest in real property that creates a relationship between the holders of the easement and the property owner. VOF has an interest in the conservation values of the property and a legal obligation to protect these values.

12(c) Agency Recommendation. The VOF is supportive of the DRPT Recommended Preferred Alternative 3B (add one track east of existing track) in Area 3 which would avoid impacts to existing open-space easements. Coordinate with VOF regarding the preservation of existing open-space easements if Build Alternative 3C is ultimately chosen for Area 3.

13. Chesapeake Bay Preservation Areas. The DEIS (page 4-6) notes that transportation projects, including rail lines, are conditionally exempt from the Chesapeake Bay Preservation Area Designation and Management Regulations. The project will be constructed in accordance with Virginia Erosion and Sediment Control Law, the Stormwater Management Act, and with any DEQ, Corps, and VRMC required permit. As such, the DC2RVA project will be in compliance with the Chesapeake Bay Preservation Act and implementing regulations.

13(a) Agency Jurisdiction. The DEQ Office of Local Government Programs administers the Chesapeake Bay Preservation Act (Virginia Code §62.1-44.15:67 *et*

VIRGINIA DEQ (continued)

48. and 49. Build Alternative 3C: Add Two-Track Bypass (East of Fredericksburg) was not selected as part of the Preferred Alternative (refer to Final EIS Section 4.3.3 for details). For Area 3, the Preferred Alternative is Alternative 3B: Add One Track East of Existing, which does not involve any Virginia Outdoors Foundation (VOF) easements, so DRPT does not anticipate any impacts to VOF easements.

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seq.) and Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 25-830-10 *et seq.*). Each Tidewater locality must adopt a program based on the Chesapeake Bay Preservation Act and the Chesapeake Bay Preservation Area Designation and Management Regulations. The Act and regulations recognize local government responsibility for land use decisions and are designed to establish a framework for compliance without dictating precisely what local programs must look like. Local governments have flexibility to develop water quality preservation programs that reflect unique local characteristics and embody other community goals. Such flexibility also facilitates innovative and creative approaches in achieving program objectives. The regulations address nonpoint source pollution by identifying and protecting certain lands called Chesapeake Bay Preservation Areas. The regulations use a resource-based approach that recognizes differences between various land forms and treats them differently.

13(b) Agency Findings. In the Cities of Richmond and Fredericksburg and the Counties of Chesterfield, Henrico, Hanover, Caroline, Spotsylvania, Stafford, Prince William, Fairfax and Arlington, the areas protected by the *Chesapeake Bay Preservation Act*, as locally implemented, require conformance with performance criteria. These areas include Resource Protection Areas (RPAs) and Resource Management Areas (RMAs) as designated by the local government. RPAs include tidal wetlands, certain non-tidal wetlands and tidal shores, and a minimum 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow. Areas within the RMA are subject to the general performance criteria as specified in 9VAC 25-830-130 of the Regulations and the local ordinance. Projects within the RMA must minimize land disturbance (including access and staging areas), retain existing vegetation and minimize impervious cover.

13(c) Agency Requirement. Construction, installation, and operation and maintenance of railroads and their appurtenant structures are conditionally exempt from the Regulations provided they are constructed in accordance with:

1. regulations promulgated pursuant to the *Erosion and Sediment Control Law*, § 10.1-603 *et seq.* of the Code of Virginia, and the *Stormwater Management Act*, § 10.1-603.1 *et seq.* of the Code of Virginia;
2. an erosion and sediment control plan and a stormwater management plan approved by the Virginia Department of Conservation and Recreation; or,
3. local water quality protection criteria at least as stringent as the above state requirements.

14. Local Participation. DEQ invited the affected localities and planning district commissions to participate in the Commonwealth's environmental review of this proposal.

14(a) Fairfax County. The Fairfax County Land Development Services (LDS), Department of Planning and Zoning (DPZ) and the Department of Public Works Urban

VIRGINIA DEQ (continued)

50. During final design, after funding becomes available and incremental improvements are scheduled, DRPT will ensure Project conformance with applicable performance criteria for areas protected by the Chesapeake Bay Preservation Act as specified in 9VAC 25-830-130 of the Chesapeake Bay Preservation Area Designation and Management Regulations and local ordinances, including minimizing land disturbance and impervious cover.

51. As discussed in Section 5.1.1.1 of the Final EIS, the Project will be constructed in accordance with the Virginia Erosion and Sediment Control Law (§10.1-560 *et seq.* of the Code of Virginia) and the Stormwater Management Act (§10.1-603.1 *et seq.* of the Code of Virginia); the terms and conditions of water quality permits required by USACE, Virginia DEQ, and VMRC; and an erosion and sediment control plan and a SWM plan approved by Virginia DEQ.

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Forestry Management Division (UFMD) reviewed the proposal, with a focus on the 43-mile section that traverses the county.

14(a)(i) Fairfax County Comments. Fairfax County noted that the Build Alternative in the county involves the addition of a third track primarily within the existing ROW. No new station, bridge, bypass, or crossings are proposed in the county. The track addition and improvements will have impacts that require mitigation.

LDS noted that the Pohick Seeps Conservation Area is a sensitive environment that could be impacted by one of the proposed track realignments. Multiple easements, including RPAs, are in place to protect this resource. Damage to the hydrology of the site could result in changes to the plant community structure which would be extremely difficult to mitigate since these communities take decades or centuries to develop.

More specific information is needed regarding the limits of disturbance (LOD) for the project and the design/placement of stormwater management facilities.

Refer to the attached letter from Fairfax County (dated October 20, 2017) for complete comments.

14(a)(ii) Fairfax County Park Authority Comments. The Fairfax County Park Authority submitted comments directly to the FRA under separate cover on January 9, 2017 and September 18, 2017. These letters were provided to DEQ on request and are attached. The comments are summarized below.

- The rail corridor passes Old Colchester Park and Preserve with an approximately 85-foot ROW between the existing rail line and the park boundary. The ROW between Mason Neck West Park boundary and the existing rails is only 56-feet. The proposed rail line may cause significant impacts to both parks via loss of land, recreational facilities, vegetation, habitat, increased stormwater discharge, and invasive species.
- The potential impacted parcel of Old Colchester Park and Reserve is deed restricted as well as subject to Section 4(f) and 6(f) Land and Water Conservation Fund lands.
- There is a high potential for impacts to numerous Native American, historical, and environmental resources within Old Colchester Park

14(a)(iii) Fairfax County Recommendation. In addition to the mitigation and Best Management Practices (BPMs) identified in the DEIS, Fairfax County recommends:

- Adequate tree protections including but not limited to tree protection fencing and signage, root pruning, and hand removal of trees (determined on a tree-by-tree basis) along the LOD;
- Invasive species management and replanting in environmentally sensitive areas such as RPAs may be necessary based on eventual location of the LOD.

VIRGINIA DEQ (continued)

52. Refer to the referenced attached Fairfax County letter (DRPT-numbered statements #136 to #138) for responses to the detailed comments that are summarized here.
53. Refer to the referenced attached Fairfax County Park Authority letter (DRPT-numbered statements #139 and #140) for responses to the detailed comments that are summarized here.
54. Refer to the referenced attached Fairfax County letter (DRPT-numbered statements #136 to #138) for responses to the detailed recommendations that are summarized here.

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The project sponsor should continue to coordinate with the Fairfax County Stormwater Planning Division as the primary county contact for resource condition and impact assessment. Coordinate with Fairfax County UFMD for review of canopy and forest stand valuation and regulatory enforcement in terms of local and state codes. Coordinate with the Fairfax County Facilities Management Division and the Fairfax County Land Acquisition Division related to the legal aspects of the easements and property rights of the Pohick Seeps.

14(a)(iv) Fairfax County Park Authority Recommendation. Submit all future documents and plans at the earliest opportunity for review by the authority to ensure the project progresses with the least disturbance to parkland.

14(a)(v) Fairfax County Park Authority Requirements.

- Obtain a Right of Entry License, Easement, and/or Construction Permit for any proposed surveying, test boring, wetland flagging, utility relocation, clearing, grading, or temporary/permanent construction on parkland, even within an existing easement. Conditions and/or fees may be required for a license/easement/permit.
- If a Section 6(f) resource is impacted, court action will be required and suitable land replacement will need to be identified, acquired, and conveyed in coordination with the park owner, DCR, and the Department of the Interior.
- A Phase I archaeological survey is required at Old Colchester Park, a known historic site. If significant sites are found, Phase II archaeological testing will be recommended to determine eligibility for inclusion on the NRHP. If sites are found eligible, avoidance or a Phase III archaeological data recovery will be recommended.

14(b) City of Fredericksburg. The City of Fredericksburg indicated that the City Council was considering the proposal and that it anticipated having some mitigation recommendations. The City intends to submit its comments directly to FRA.

14(c) Town of Ashland. The Town of Ashland reviewed the proposal and submitted extensive comments under a letter dated October 18, 2017. The Town's primary comments and recommendations are summarized below. For complete comments and recommendations, refer to the attached letter.

14(c)(i) Town of Ashland Comments.

Chapter 2: Alternatives

- The Town of Ashland supports the reconsideration of the Deep Bore Tunnel option which was previously screened out of consideration. This option would avoid the impacts of the bypass alternatives and would garner community and local government support. The cost of the option should be weighed against the economic cost of the other build alternatives to the local community.
- Alternative 5C (add two-track western bypass with downtown Ashland station

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VIRGINIA DEQ (continued)

(Response to comment 54 on previous page)

55. Refer to the referenced attached Fairfax County Park Authority letter (DRPT-numbered statements #139 and #140) for responses to the detailed recommendations that are summarized here.

56. DRPT received and has responded to comments from City of Fredericksburg under separate cover; the City's letter and DRPT's responses are included as part of the Final EIS.

57. and 58. Refer to the referenced attached Town of Ashland letter (DRPT-numbered statements #142 through #195) for responses to the detailed comments and recommendations that are summarized here.

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remaining) is the only option under current consideration that would not cause significant damage to the community.

Chapter 3: Affected Environment

- Ashland opposes the construction of a third rail through the center of town. The additional vibration associated with a third track and additional trains would have a negative impact on historic buildings in the downtown commercial district.
- Ashland does not support any scenario which moves the Ashland Station from downtown.

Chapter 6: Public Involvement and Agency Coordination

- The Town of Ashland does not believe the recommendations of the Community Advisory Committee (CAC) can be fully incorporated into the Final EIS without considerable additional opportunities for public input, further engineering and analysis, and efforts to mitigate impacts of the proposals through the CAC process due to the committee being convened for the first time in May 2017, late into the EIS study process.

Chapter 7: DRPT Recommended Preferred Alternative

- The Town of Ashland disagrees with the statement that there is no local consensus or preference for a Build Alternative. According to Ashland, the Town and Hanover County would unanimously support a Deep Bore Tunnel.

14(c)(ii) Town of Ashland Recommendations.

Chapter 1: Purpose and Need

- Analyze potential effects of technological changes (autonomous vehicles and intelligent transportation systems) that may occur between now and the 2025 estimated in-service date on the need for the project. Current information should be reconsidered every 2-3 years.
- The anticipated goal for improved travel time from the proposal has reduced to about five minutes from fifteen minutes. Further public outreach and education should be conducted to ensure those who previously commented on the Tier 1 EIS are aware of the change and reduction in benefit of the project.
- Conduct additional study to address improvements in technology and energy efficiency associated with electric train travel (versus conventional fossil-fueled equipment), as it relates to the project stated benefit of increased energy-efficiency.
- Consider the possibility that the proposed use of fossil-fuel burning equipment for the project rather than electric-powered equipment may be technologically obsolete by the time construction is completed.

Chapter 2: Alternatives

- The Town of Ashland advocates for additional consideration of the Deep Bore Tunnel option which was previously removed from consideration.

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VIRGINIA DEQ (continued)

(Response to comments 57 and 58 on previous page)

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VIRGINIA DEQ (continued)

(For response to comments 58, refer to pages B-87)

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- The Town of Ashland recommends removal of the Build Alternatives that involve relocation of the station to Ashcake (5A-Ashcake, 5B-Ashcake, 5C-Ashcake, 5D-Ashcake). The proposed Ashcake Road Station has limited connectivity to east-west primary roadways, possibly conflicts with local land use, and is removed from Ashland's central urban area.
- Further consideration of Build Alternative AEB1 (Ashland East Bypass) which was previously screened out of consideration is warranted. According to Ashland, Hanover County has stated that it is willing to consider relocating the park which led to the option being assessed as having impacts to parks and recreational areas which ultimately resulted in the dismissal of the alternative.
- Under all scenarios, a station must remain in downtown Ashland to maintain the character of the community.

Chapter 3: Affected Environment

- The Ashland/Hanover Visitor Center located in the Ashland Depot Train Station should be considered a community facility for the purpose of Table 3.11-5 and all other sections of the DEIS (including Chapter 4).
- Consider and incorporate the attached Ashland Museum comments into Section 3.13.2.1- Buildings, Districts, Structures, and Objects.

Chapter 4: Environmental Consequences

- Alternatives 5B and 5D which involve a third rail through the center of town would have a high visual impact to the town. Section 4.9.1.5 should be updated to reflect this. Additionally, adding an additional set of tracks through town is not compatible with the town's comprehensive plan, existing land use, or future land use (Section 4.11.5.2). These options would also require the closure of the eastern section of Center Street/Railroad Ave creating a negative economic and traffic safety impact.
- Construction of Alternative 5B would result in a significant number of residential and commercial structures being destroyed. Update Section 4.11.1 to reflect this.
- The following Build Alternatives would result in significant business closures and economic loss: 5A, 5A-Ashcake, 5B, 5B-Ashcake, and 5D-Ashcake. Section 4.11.1 should be updated to reflect this and take into account the Economic Impact Analysis (see General Recommendations below)

Chapter 5: Section 4(f) Evaluation

- Additional consideration should be given to the contributing structures identified in the Ashland Museum and Town of Ashland Section 106 response. The Town concurs that Alternative 5C would best avoid impacts to historic resources.
- Further opportunities for public and stakeholder input are necessary once a preferred alternative for Area 5 is recommended.

Appendix Q: Community Impact Assessment Technical Report

- Commence a more accurate count of business/residential relocations, closures,

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and acquisitions that would occur in downtown Ashland with any option that brings additional rail capacity through downtown Ashland. Update Table 3-4 accordingly.

Appendix R: Cultural Resources Report

- Any and all cultural resources identified by the Ashland Museum should be addressed in the DEIS and Final EIS.

Overall Recommendations

- Consider the attached economic impact analysis titled *Estimated Impact of Proposed DC2RVA Rail Alternatives on the Town of Ashland*, commissioned by the Town to analyze impacts of the proposal on the economic vitality of the community.
- Discontinue any consideration of the three track trench option as it was created at the last CAC meeting (as of the writing of the October 18, 2017 Town of Ashland letter) and has not been evaluated sufficiently to warrant moving forward in the DEIS or Final EIS.

14(d) Richmond Regional Planning District Commission. The Richmond Regional PDC inquired with its member jurisdictions regarding this proposal. The PDC received no comments from locality staff and the PDC staff has no comments on the proposal.

14(e) Crater Planning District Commission. The Crater PDC had no comments on the proposal.

15. Pollution Prevention. DEQ advocates that principles of pollution prevention and sustainability be used in all construction projects as well as in facility operations. Effective siting, planning, and on-site BMPs will help to ensure that environmental impacts are minimized. However, pollution prevention and sustainability techniques also include decisions related to construction materials, design, and operational procedures that will facilitate the reduction of wastes at the source.

15(a) Recommendations. We have several pollution prevention recommendations that may be helpful in the construction of this project and in the operation of the facility:

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the proposed facility is committed to complying with environmental regulations, reducing risk, minimizing environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program (VEEP). VEEP provides recognition, annual permit fee discounts, and the possibility for alternative compliance methods.

VIRGINIA DEQ (continued)

(Response to comment 58 on page B-87)

59. Comment noted; DRPT did not receive comments directly from the Richmond Regional PDC.
60. Comment noted; DRPT did not receive comments directly from the Crater PDC.
61. Railroad operators maintain their own environmental management systems. For example, Amtrak's *Environmental Management System Manual* (issued September 2001, revised March 2004) and CSX's *Public Safety, Health & Environment Management System* (<https://www.csx.com/index.cfm/responsibility/environment-and-efficiency/environmental-management-system/>) have been designed to ensure compliance with environmental regulations and minimize environmental impacts. DRPT will consider sustainable materials and practices for construction and operation of the Project to the extent practicable.

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- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider energy efficiency when choosing materials and products, like insulation, fixtures, and HVAC systems.
- Consider contractors' commitment to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.
- Integrate pollution prevention techniques into the facility maintenance and operation, to include inventory control for centralized storage of hazardous materials and source reduction (fixing leaks, energy efficient products). Maintenance facilities should have sufficient and suitable space to allow for effective inventory control and preventive maintenance.

DEQ's Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques and EMS. For more information, contact DEQ's Office of Pollution Prevention, Meghann Quinn at (804) 698-4021.

16. Water Conservation. The following recommendations will result in reduced water use associated with the operation of the railroad and associated facilities (stations).

- Grounds should be landscaped with hardy native plant species to conserve water as well as minimize the need to use fertilizers and pesticides.
- Convert turf to low water-use landscaping such as drought resistant grass, plants, shrubs and trees.
- Consider installing low-flow restrictors/aerators to faucets.
- Improve irrigation practices by:
 - o upgrading with a sprinkler clock; watering at night, if possible, to reduce evapotranspiration (lawns need only 1 inch of water per week and do not need to be watered daily; over watering causes 85 percent of turf problems);
 - o installing a rain shutoff device; and
 - o collecting rainwater with a rain bucket or cistern system with drip lines.
- Check for and repair leaks during routine maintenance activities.
- Consider replacement of old equipment with new high-efficiency machines to reduce water usage by 30-50 percent per use.

17. Energy Conservation. For any new facility construction such as new stations, the proposed facility should be planned and designed to comply with state and federal guidelines and industry standards for energy conservation and efficiency. The commonwealth encourages architectural and engineering designers to recognize and incorporate the energy, environmental, and sustainability concepts listed in the LEED

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63

VIRGINIA DEQ (continued)

(Response to comment 61 on previous page)

62. During final design, after funding becomes available and incremental improvements are scheduled, DRPT will consider incorporating water-reducing measures into facilities design, where practicable. Maintenance procedures will be determined by the facilities operator following construction.
63. Final design, after funding becomes available and incremental improvements are scheduled, will comply with state and federal guidelines and industry standards for energy conservation and efficiency. DRPT will consider energy, environmental, and sustainability concepts listed in the LEED Green Building Rating System for facilities during final design.

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Green Building Rating System into the development and procurement of their projects.

The energy efficiency of the facilities can be enhanced by maximizing the use of the following:

- thermally-efficient building shell components (roof, wall, floor, windows, and insulation);
- facility siting and orientation with consideration towards natural lighting and solar loads
- high efficiency heating, ventilation, air conditioning systems;
- high efficiency lighting systems and daylighting techniques; and
- energy-efficient appliances.

Contact the Department of Mines, Minerals and Energy, David Spears at (434) 951-6350, for assistance in meeting this challenge.

REGULATORY AND COORDINATION NEEDS

1. Surface Waters and Wetlands. The project must comply with the Virginia Water Protection Program (Virginia Code § 62.1-44.15 *et seq.*). DEQ regulates impacts to waters and wetlands pursuant to 9VAC25-210 *et seq.* If the proposed activities require impacts to wetlands or surface waters, coordinate with the appropriate DEQ Regional Office regarding potential permitting requirements (NRO 703-583-3800, PRO 804-527-5020).

2. Tidal Wetlands and Subaqueous Lands. Pursuant to section 28.2-1204 of the Code of Virginia, the VMRC has jurisdiction over tidal wetlands any encroachments in, on or over any state-owned rivers, streams or creeks in the Commonwealth. Contact VMRC (Tony Watkinson at 757-247-2250) regarding the submittal of a JPA for proposed impacts to tidal wetlands and submerged lands.

3. Erosion and Sediment Control and Stormwater Management.

3(a) Erosion and Sediment Control Annual Specifications. In accordance with §62.1-44.15 *et seq.*, electric, natural gas and telephone utility companies, interstate and intrastate natural gas pipeline companies, and railroad companies shall, and authorities created pursuant to § 15.2-5102 may, file general erosion and sediment control standards and specifications annually with DEQ for review and approval. Such standards and specifications shall be consistent with the requirements of this article and associated regulations and the Erosion and Sediment Control Law and Stormwater Management Act (§ 62.1-44.15:24 *et seq.*) and associated regulations where applicable.

3(b) Site-Specific Plans. Site-specific stormwater management and erosion and sediment control plans are required in accordance with the approved standards and

VIRGINIA DEQ (continued)

(Response to comment 63 on previous page)

64. and 65. Permit requirements and mitigations are discussed in Sections 5.1.5 and 5.1.6 of the Final EIS. DRPT will continue coordination with the federal and state regulatory agencies during the final design and construction phases of the Project, after funding becomes available and incremental improvements are scheduled. For proposed activities that impact wetlands and/or surface waters, DRPT will prepare a JPA to be submitted to the DEQ, VMRC, USACE and local wetland boards.
66. It is the responsibility of CSXT, as owner of the rail line and operator of freight service, to file general erosion and sediment control standards and specifications annually with DEQ for review and approval.
67. DRPT will develop site-specific SWM and erosion and sediment control plans as part of the Project's final design phase, after funding becomes available and incremental improvements are scheduled. DRPT will continue coordination at that time with the DEQ and will develop plans in accordance with the approved standards and specifications.

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specifications are required.

Contact the DEQ Office of Stormwater Management (Hannah Zegler, 804-698-4206) for additional information.

3(c) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities (VAR10). For projects involving land-disturbing activities of equal to or greater than one acre the applicant is required to register for coverage under the Virginia Stormwater Management Program General Permit for Discharges of Stormwater from Construction Activities (9 VAC 25-870-1 *et seq.*). Specific questions regarding the Stormwater Management Program requirements should be directed to DEQ, Holly Sepety at (804) 698-4039.

4. Air Quality Regulations. This project is subject to air regulations administered by the Department of Environmental Quality. The following sections of the Code of Virginia and Virginia Administrative Code (VAC) are applicable:

- fugitive dust and emissions control (9 VAC 5-50-60 *et seq.*);
- permits for fuel-burning equipment (9VAC5-80-1100 *et seq.*);
- asphalt paving operations (9 VAC 5-45-760 *et seq.*); and
- open burning restrictions (9 VAC 5-130 *et seq.*).

Coordinate with the appropriate DEQ Regional Office with questions (NRO 703-583-3800, PRO 804-527-5020).

5. Solid and Hazardous Wastes. All solid waste, hazardous waste, and hazardous materials must be managed in accordance with all applicable federal, state, and local environmental regulations.

For additional information concerning location and availability of suitable waste management facilities in the project area or if free product, discolored soils, or other evidence of contaminated soils are encountered, coordinate with the appropriate DEQ Regional Office (NRO 703-583-3800, PRO 804-527-5020).

5(a) Asbestos-Containing Material. It is the responsibility of the owner or operator of a demolition activity to thoroughly inspect the affected part of the facility prior to demolition for the presence of asbestos, including Category I and Category II nonfriable asbestos-containing material. Upon classification as friable or non-friable, all asbestos-containing material shall be disposed of in accordance with the Virginia Solid Waste Management Regulations (9 VAC 20-80-640) and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9 VAC 20-110-10 *et seq.*). Contact the Department of Labor and Industry (804-371-2327) for additional information.

5(b) Lead-Based Paint. This project must comply with the U.S. Department of Labor,

VIRGINIA DEQ (continued)

(Response to comment 67 on previous page)

68. Construction activities associated with several of the proposed improvement elements will disturb more than one acre of land. These improvements include straightening of curves, new mainline track and crossovers, station and station area improvements, new sidings and signals, and safety improvements at grade-crossings. DRPT will develop SWM plans for these improvements to be registered for coverage under the Virginia Stormwater Management Program General Permit for Discharges of Stormwater Activities, during the final design phase of the Project, after funding becomes available and incremental improvements are scheduled. See Sections 5.1.6 and 5.19.2 of the Final EIS.

69. Demolition and construction activities can result in short-term increases in air pollutants. DPRT will minimize potential negative effects during construction (through the contractor at that time) with the application of appropriate BMP's. See Sections 5.1.6 and 5.19.2 of the Final EIS.

70. All solid waste, hazardous waste, and hazardous materials generated by the Project will be handled and managed in accordance with federal, state and local regulations, including the Virginia Solid Waste Management Regulations (VSWMR). Impacts from the Preferred Alternative to known (or potential) hazardous material sites have been identified and discussed in Section 5.5 of the Final EIS.

71. Any asbestos, lead, or contaminated residues generated by construction of the Project will be handled in accordance with the VSWMR and transported in accordance with the Virginia regulations governing the Transportation of Hazardous Materials. DRPT will continue coordination with the DEQ and the Virginia Department of Labor and Industry during final design, after funding becomes available and incremental improvements are scheduled. See Sections 5.5 and 5.18 of the Final EIS.

72. Any use of lead-based paints during construction will be performed in accordance with Occupational Safety and Health Administration (OSHA) regulations and with the Virginia Lead-Based Paint Activities Rules and Regulations.

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Occupational Safety and Health Administration (OSHA) regulations and with the Virginia Lead-Based Paint Activities Rules and Regulations. For additional information regarding these requirements, contact the Department of Professional and Occupational Regulation at (804) 367-8500.

5(c) Petroleum Contamination. In accordance with Virginia Code §§ 62.1-44.34.8 through 9 and 9 VAC 25-580-10 *et seq.* contact the appropriate DEQ Regional Office (NRO 703-583-3800, PRO 804-527-5020) if evidence of a petroleum release is discovered during construction of this project.

5(d) Petroleum Storage Tanks Installation and operation or the relocation/removal of any regulated petroleum storage tank(s) either AST or UST must also be conducted in accordance with the Virginia Regulations 9 VAC 25-91-10 *et seq.* and / or 9 VAC 25-580-10 *et seq.* Tank registration may be accomplished by contacting the appropriate DEQ Regional Office (NRO 703-583-3800, PRO 804-527-5020) for additional details.

6. Natural Heritage and Recreational Resources. Contact DCR DNH (Robbie Rhur 804-371-2594) with questions regarding DCR's site-specific recommendations laid out in the *Environmental Impacts and Mitigation* Section 6(c) and 7(c). Coordinate with Synthia Waymack at synthia.wymack@dcr.virginia.gov to fully understand the requirements of conversion of LWCF properties.

Contact DCR DNH, Rene Hypes at (804) 371-2708, to secure updated information on natural heritage resources if the scope of the project changes and/or six months has passed before the project is implemented, since new and updated information is continually added to the Biotics Data System.

7. State Parks. Coordinate with the State Parks Division Director (Craig Seaver, Craig.Seaver@dcr.virginia.gov) regarding potential impacts to State Parks.

8. Historic and Archaeological Resources. The FRA should continue to coordinate the project with DHR, as necessary, to ensure compliance with Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations at 36 CFR 800. Contact DHR (Roger Kirchen at 804-482-6091 or Roger.Kirchen@dhr.virginia.gov) regarding coordination.

9. Public Water Supply, Sanitary Sewer Distribution Systems and On-Site Sewage Systems. Potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the local utility. Contact VDH, Arlene Fields Warren with questions (804-864-7781).

Coordinate with the local health department to submit an application should relocation of any onsite sewage systems be necessary due to construction. Local health department contact information is available at the following webpage:
<http://www.vdh.virginia.gov/local-health-districts/>.

VIRGINIA DEQ (continued)

(Response to comment 72 on previous page)

73. Any environmental release (e.g., petroleum, hydraulic fluids, etc.) during construction will be immediately remediated on-site and the appropriate DEQ Regional Office will be contacted.
74. The installation and operation or the relocation/removal of any regulated petroleum storage tanks (above ground or underground) during construction will be conducted in accordance with Virginia Regulations 9 VAC 25-91-10 *et seq.* and/or 9 VAC 25-580-10 *et seq.*
75. See responses to DRPT-numbered statements #26, #36, #37 and #38.
76. DRPT will continue to coordinate with the Department of Conservation and Recreation – State Parks Division, through final design, after funding becomes available and incremental improvements are scheduled.
77. DRPT will continue to coordinate with DHR to ensure compliance with requirements of Section 106 of the National Historic Preservation Act. DRPT received notification from DHR under separate cover; refer to DHR's letter, which is included as part of the agency responses in the Final EIS.
78. Final confirmation of all public utilities will be performed during the final design phase of the Project, after funding becomes available and incremental improvements are scheduled.

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10. Open Space. Contact the VOF (Brian Fuller, 434-906-0879) for additional coordination regarding the preservation of existing open-space easements if Build Alternative 3C is ultimately chosen for Area 3.

11. Chesapeake Bay Preservation Areas. The project must satisfy the applicable Chesapeake Bay Preservation Act (Virginia Code 62.1-44.15 *et seq.*) and the Chesapeake Bay Preservation Area Designation and Management Regulations (9VAC25-830 *et seq.*) (Regulations). Section 9VAC25-830-150 of the Regulations exempt railroads and their appurtenant structures on the condition that the construction, installation, operation and maintenance of such railroads and structures are in accord with the following:

1. Regulations promulgated pursuant to the Virginia Erosion and Sediment Control Law and the Virginia Stormwater Management Act;
2. An erosion and sediment control plan and a stormwater management approved by the Virginia Department of Environmental Quality and
3. Local water quality protection criteria at least as stringent as the above state requirements.

Contact the DEQ Office of Local Government Assistance Programs Daniel Moore (804-698-4520) with questions.

12. Fairfax County. Coordinate with the Fairfax County Department of Planning and Zoning (Erin Haley, 703-324-1380) regarding the comments and recommendations outlined in the Environmental Impacts and Mitigation Section 14(a)(i) and 14(a)(iii).

Coordinate with the Fairfax County Park Authority Easement Coordinator (703-324-8741) to obtain an application for a Right of Entry License, Easement, and/or Construction Permit, as necessary, for access to Park Authority owned property.

Contact Andy Galusha (Senior Landscape Architect, 703-324-8755) with questions regarding the Fairfax County Park Authority's comments, recommendations, and requirements found in the Environmental Impacts and Mitigation Sections 14(a)(ii), 14(a)(iv), and 14(a)(v).

13. Town of Ashland. Coordinate with the Town of Ashland Town Manager (Joshua Farrar, 804-798-9219) regarding the Town's extensive comments and recommendations related to the proposed Build Alternatives within Area 5 of the project corridor.

14. Federal Consistency. The FRA must submit a Federal Consistency Determination pursuant to the Coastal Zone Management Act (CZMA) of 1972, as amended (16 USCA, CZMA § 307, § 1456(c)(3)(A)) and its implementing federal consistency regulations (15 CFR Part 930, subpart C). Coordinate directly with OEIR for the

VIRGINIA DEQ (continued)

79. Build Alternative 3C – Add Two-Track Bypass (East of Fredericksburg) was not selected as part of the Preferred Alternative. (refer to Final EIS Section 4.3.3 for details). For Area 3, the Preferred Alternative is Alternative 3B: Add One Track East of Existing.

80. The DC2RVA Project is conditionally exempt from the Chesapeake Bay Preservation Act regulations. All construction will be in accordance with erosion and sediment control requirements and water quality protection criteria (see DRPT-numbered statements #66, #67 and #68 above).

81. See responses to DRPT-numbered statements #52 through #55.

82. DRPT coordinated with the Town of Ashland throughout selection of the Preferred Alternative of the Final EIS. Refer to DRPT-numbered statements #142 through #197 for responses to comments submitted by the Town.

83. As part of final design after funding becomes available and incremental improvements are scheduled, the sponsoring agency will submit a Federal Consistency Determination for the recommended Preferred Alternative that analyzes the coastal effects of the Project in light of the enforceable policies of the Virginia CZMA program and provides commitment to comply with those policies.

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submission of FCDs. Information on document submission is available at <http://www.deq.virginia.gov/Programs/EnvironmentalImpactReview/DocumentSubmissions.aspx>. Information on FCDs is available at <http://www.deq.virginia.gov/Programs/EnvironmentalImpactReview/FederalConsistencyReviews.aspx>

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CONCLUSION

Thank you for the opportunity to review and respond to the Tier II Draft Environmental Impact Statement for the Washington, D.C. to Richmond Southeast High Speed Rail Project. Detailed comments of reviewing agencies are attached for your review. Please contact me at (804) 698-4204 or Janine Howard at (804) 698-4299 for clarification of these comments.

Sincerely,


Bettina Rayfield, Program Manager
Environmental Impact Review

Ec:

Robbie Rhur, DCR
Amy Ewing, DGIF
Keith Tignor, VDACS
Arlene Fields Warren, VDH
Roger Kirchen, DHR
Greg Evans, DOF
Tony Watkinson, VMRC
Elizabeth Jordan, VDOT
Martha Little, Virginia Outdoors Foundation
Denise James, Fairfax County
Joseph Casey, Chesterfield County
Charles Culley, Caroline County
Mark Taylor, Spotsylvania County
Thomas Foley, Stafford County
Justin Patton, Prince William County
Mark Olinger, City of Richmond
Timothy Baroody, City of Fredericksburg
Mark Schwartz, Arlington County
John Vitthoulkas, Henrico County
Cecil R. Harris Jr., Hanover County
Joshua, Farrar, Town of Ashland
Bob Sisson, City of Fairfax

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VIRGINIA DEQ (continued)

(Response to comment 83 on previous page)

VIRGINIA DEQ (continued)

(No comments on this page)

DC2RVA Southeast High Speed Rail DEIS
17-134F

Attachment A: Complete Comments Submitted on DC2RVA DEIS

Howard, Janine (DEQ)

From: Zegler, Hannah (DEQ)
Sent: Wednesday, October 25, 2017 11:17 AM
To: Howard, Janine (DEQ); Gavan, Larry (DEQ)
Subject: RE: NEW PROJECT FRA DC to Richmond Rail 17-134F

Yep!

From: Howard, Janine (DEQ)
Sent: Wednesday, October 25, 2017 11:16 AM
To: Zegler, Hannah (DEQ) <Hannah.Zegler@deq.virginia.gov>; Gavan, Larry (DEQ) <Larry.Gavan@deq.virginia.gov>
Subject: RE: NEW PROJECT FRA DC to Richmond Rail 17-134F

Thanks! Would the language for the VAR10 permit be appropriate to include as well?

3(b)(ii) General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (VAR10). The operator or owner of a construction activity involving land disturbance of equal to or greater than 1 acre is required to register for coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Regulations. General information and registration forms for the General Permit are available at www.deq.virginia.gov/Programs/Water/StormwaterManagement/VSMPPermits/ConstructionGeneralPermit.aspx.

Janine Howard
 Environmental Impact Review Coordinator

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

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

For program updates and public notices please subscribe to the [OEIR News Feed](#)

From: Zegler, Hannah (DEQ)
Sent: Wednesday, October 25, 2017 11:06 AM
To: Howard, Janine (DEQ); Gavan, Larry (DEQ)
Subject: RE: NEW PROJECT FRA DC to Richmond Rail 17-134F

CSX still has AS&S.
 Your statement looks good. I've highlighted one section to show that railroads can pretty much cover anything under their AS&S.

VIRGINIA DEQ (continued)

84. The content on this page is included in Section 3 ("Erosion and Sediment Control and Stormwater Management") of DEQ's main letter. Refer to DRPT-numbered statements #8 through #11.

VIRGINIA DEQ (continued)

(Response to comment 84 on previous page)

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From: Howard, Janine (DEQ)
Sent: Wednesday, October 25, 2017 11:02 AM
To: Gavan, Larry (DEQ) <Larry.Gavan@deq.virginia.gov>; Zegler, Hannah (DEQ) <Hannah.Zegler@deq.virginia.gov>
Subject: FW: NEW PROJECT FRA DC to Richmond Rail 17-134F

Hannah and Larry,

I'd like your input on this project. The proposal is for new rail lines on a 123-mile existing rail corridor that is owned by CSX Transportation, Inc. Bypass options around Ashland and Fredericksburg will require new ROW if chosen. The project is a joint state and federal venture undertaken by the Federal Rail Administration and the Virginia Department of Rail and Public Transportation. My understanding is that both federal and state funding will be utilized and the project will be implemented incrementally, with an in service date of 2025. The condensed executive summary for the project is available at the link below.

The latest spreadsheet that I have from Hannah shows that CSX has approved AS&S. However, since many years will pass before any construction happens I thought I'd use the below language. Let me know if this is correct/appropriate for this project.

(i) Erosion and Sediment Control Annual Specifications and Stormwater Management. In accordance with §62.1-44.15 *et seq.*, electric, natural gas and telephone utility companies, interstate and intrastate natural gas pipeline companies, and railroad companies shall, and authorities created pursuant to § 15.2-5102 may, file general erosion and sediment control standards and specifications annually with DEQ for review and approval. Such standards and specifications shall be consistent with the requirements of this article and associated regulations and the Erosion and Sediment Control Law and Stormwater Management Act (§ 62.1-44.15:24 *et seq.*) and associated regulations where applicable. The specifications shall apply to:

- Construction, installation, or maintenance of electric transmission, natural gas, and telephone utility lines and pipelines, and water and sewer lines; and
- Construction of the tracks, rights-of-way, bridges, communication facilities, and other related structures and facilities of the railroad company.

(ii) Erosion and Sediment Control Site-Specific Plans. The owner is responsible for the development, review, and approval of a site-specific erosion and sediment control (ESC) plan in accordance with the approved erosion and sediment control standards and specifications. All regulated land-disturbing activities associated with the project/site, including on and off site access roads, staging areas, borrow areas, stockpiles, and soil intentionally transported from the project, must be covered by the site-specific ESC plan.

(iii) Stormwater Management Site-Specific Plans. The owner is responsible for the development, review, and approval of a site-specific stormwater management (SWM) plan in accordance with the approved standards and specifications.

Also, some of the alternative include either renovation of existing train stations or construction of new stations. Would the AS&S cover land disturbance associated with station construction (i.e. do stations count as "other related structures and facilities of the railroad company"?)

Thanks,

Janine Howard
 Environmental Impact Review Coordinator

**DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION**

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

TO: Janine L. Howard

DEQ - OEIA PROJECT NUMBER: DEQ #17-134F

PROJECT TYPE: ☐ STATE EA / EIR ☒ FEDERAL EA / EIS ☐ SCC☐ CONSISTENCY DETERMINATION

PROJECT TITLE: DC to Richmond Southeast High Speed Rail

PROJECT SPONSOR: Federal Railroad Administration

PROJECT LOCATION: ☒ OZONE ATTAINMENT, MAINTENANCE & NONATTAINMENT
AND EMISSION CONTROL AREA FOR NOX & VOCREGULATORY REQUIREMENTS MAY BE APPLICABLE TO: ☒ CONSTRUCTION
☐ OPERATION**STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:**

1. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E – STAGE I
2. ☐ 9 VAC 5-45-760 et seq. – Asphalt Paving operations
3. ☒ 9 VAC 5-130 et seq. – Open Burning
4. ☒ 9 VAC 5-50-60 et seq. Fugitive Dust Emissions
5. ☐ 9 VAC 5-50-130 et seq. – Odorous Emissions; Applicable to _____
6. ☐ 9 VAC 5-60-300 et seq. – Standards of Performance for Toxic Pollutants
7. ☐ 9 VAC 5-50-400 Subpart _____, Standards of Performance for New Stationary Sources, designates standards of performance for the _____
8. ☐ 9 VAC 5-80-1100 et seq. of the regulations – Permits for Stationary Sources
9. ☐ 9 VAC 5-80-1605 et seq. Of the regulations – Major or Modified Sources located in PSD areas. This rule may be applicable to the _____
10. ☐ 9 VAC 5-80-2000 et seq. of the regulations – New and modified sources located in non-attainment areas
11. ☐ 9 VAC 5-80-800 et seq. Of the regulations – State Operating Permits. This rule may be applicable to _____

COMMENTS SPECIFIC TO THE PROJECT:

All precautions are necessary to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NO_x) in some of the affected counties during construction. (Arlington, Fairfax, Prince William, Spotsylvania, Stafford, Alexandria, Fredericksburg, Henrico, & Hanover, Richmond)



(Kotur S. Narasimhan)
Office of Air Data Analysis

DATE: September 13, 2017

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VIRGINIA DEQ (continued)

85. The content on this page is included in Section 4 ("Air Pollution Control") of DEQ's main letter. Refer to DRPT-numbered statements #13 through #18.

VIRGINIA DEQ (continued)

86. The content on this page is included in the sections of DEQ's main letter. Refer to DRPT-numbered statements in the following sections: Section 5 (DRPT-numbered statements #19 through #24) for hazardous materials and waste; Section 4 (DRPT-numbered statements #14 through #18) for air pollution control; Section 1 for water quality and wetlands (DRPT-numbered statements #2 through #4); and Section 3 (DRPT-numbered statements #8 through #12) for Erosion and Sediment Control and Stormwater Management.

Howard, Janine (DEQ)

From: Burstein, Daniel (DEQ)
Sent: Friday, October 06, 2017 1:08 PM
To: Howard, Janine (DEQ)
Subject: Re: Federal Railroad Administration: DC to Richmond Southeast High Speed Rail Project, DEQ #17-134F - Review

NRO comments regarding the Draft EIS for the Federal Railroad Administration: DC to Richmond Southeast High Speed Rail Project, DEQ #17-134F, located in the City of Fredericksburg, and Caroline, Spotsylvania, Stafford, Prince William, Fairfax, and Arlington Counties, Virginia are as follows:

Land Protection Division – The project manager is reminded that if any solid or hazardous waste is generated/encountered during construction, the project manager would follow applicable federal, state, and county regulations for their disposal.

Air Compliance/Permitting - The project manager is reminded that during the construction phases that occur with this project; the project is subject to the Fugitive Dust/Fugitive Emissions Rule 9 VAC 5-50-60 through 9 VAC 5-50-120. In addition, should any open burning or use of special incineration devices be employed in the disposal of land clearing debris during demolition and construction, the operation would be subject to the Open Burning Regulation 9 VAC 5-130-10 through 9 VAC 5-130-60 and 9 VAC 5-130-100.

Virginia Water Protection Permit (VWPP) Program – According to the submission, impacts to surface waters will be necessary. DEQ VWP staff recommends that the avoidance and minimization of surface water impacts to the maximum extent practicable as well as coordination with the US Army Corps of Engineers. Upon receipt of a Joint Permit Application for the proposed surface water impacts, DEQ VWP Permit staff will review the proposed project in accordance with the VWP permit program regulations and current VWP permit program guidance.

Erosion and Sediment Control and Storm Water Management: DEQ has regulatory authority for the Virginia Pollutant Discharge Elimination System (VPDES) programs related to municipal separate storm sewer systems (MS4s) and construction activities. Erosion and sediment control measures are addressed in local ordinances and State regulations. Additional information is available at <http://www.deq.virginia.gov/Programs/Water/StormwaterManagement.aspx>. Non-point source pollution resulting from this project should be minimized by using effective erosion and sediment control practices and structures. Consideration should also be given to using permeable paving for parking areas and walkways where appropriate, and denuded areas should be promptly revegetated following construction work. If the total land disturbance exceeds 10,000 square feet, an erosion and sediment control plan will be required. Some localities also require an E&S plan for disturbances less than 10,000 square feet. A stormwater management plan may also be required. For any land disturbing activities equal to one acre or more, you are required to apply for coverage under the VPDES General Permit for Discharges of Storm Water from Construction Activities. The Virginia Stormwater Management Permit Authority may be DEQ or the locality.

Daniel Burstein
 Regional Enforcement Specialist, Senior II
 Virginia Department of Environmental Quality
 Northern Virginia Regional Office
 13901 Crown Court
 Woodbridge, VA 22193

**MEMORANDUM**

TO: Janine Howard, DEQ/EIR Environmental Program Planner

FROM: Katy Dacey, Division of Land Protection & Revitalization Review Coordinator

DATE: October 3, 2017

COPIES: Sanjay Thirunagari, Division of Land Protection & Revitalization Review Manager; file

SUBJECT: Environmental Impact Review: EIR Project No 17-134F DC to Richmond Southeast High Speed Rail, Cities of Richmond and Fredericksburg, Chesterfield, Henrico, Hanover, Caroline, Spotsylvania, Stafford, Prince William, Fairfax and Arlington Counties, VA

The Division of Land Protection & Revitalization (DLPR) has completed its review of the September 2017 Draft EIR for the DC to Richmond Southeast High Speed Rail project located within the Cities of Richmond and Fredericksburg and the Counties of Chesterfield, Henrico, Hanover, Caroline, Spotsylvania, Stafford, Prince William, Fairfax and Arlington in Virginia

Project Scope: construction of a passenger rail service and infrastructure improvements to north-south travel corridor between Washington, DC and Richmond, VA

This submittal indicated that solid and hazardous waste issues were addressed and that a search of Federal and State environmental databases was conducted. DLPR staff with Geographical Information Systems conducted a 1000-foot radius search of Hazardous Waste, RCRA Corrective Action, Federal Facilities, Solid Waste, Virginia Remediation Program and Petroleum Release databases for sites along the entire project corridor in Virginia. DLPR staff identified four-hundred one sites within the search parameters which may impact the project activity. DLPR staff has reviewed the submittal and offers the following comments:

Hazardous Waste/RCRA Facilities – thirty-nine in close proximity to project corridor

EPA ID	RCRA/Hazardous Waste	Address	City	State	Zip Code	Status
VAD891039781	ALEXANDRIA MOTOR EQUIPMENT DIV	3550 WHEELER AVE	ALEXANDRIA	VA	22304	SQG
VAD040557621	ALLEN DON SERVICE CENTER	5404 EISENHOWER AVE	ALEXANDRIA	VA	22304	SQG
VAR000501866	ANC RENTAL CORP.	1200 N FAYETTE ST.	ALEXANDRIA	VA	22314	SQG
VAD982570335	BEST AUTO BODY	6535 S VAN DORN ST	ALEXANDRIA	VA	22310	SQG
VAD988222345	EAST COAST TRANSMISSION	5316 EISENHOWER AVE	ALEXANDRIA	VA	22304	SQG

VIRGINIA DEQ (continued)

87. through 93. DRPT appreciates the list of hazardous materials sites provided by DLPR. The extent of DLPR's list (401 sites) is comparable to the number of sites identified in Section 3.5.3 of the Draft EIS that have the potential to affect the Project, i.e. 484 sites, including CERCLA, potential or known hazardous material releases/contamination, and petroleum release sites. Section 5.5 of the Final EIS lists those sites which are within the permanent Limits of Disturbance (LOD) of the Preferred Alternative; updated mapping of critical hazardous materials sites in relation to that LOD are included in Appendix M.

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VIRGINIA DEQ (continued)

(For response to comments 87 through 93, refer to page B-102)

VAD04948635	DESIGN & PRODUCTION INC.	5312 EISENHOWER AVE.	ALEXANDRIA	VA	22304	SQG
VAD00052937	ENTERPRISE HOLDINGS	4700 EISENHOWER AVENUE	ALEXANDRIA	VA	22304	SQG
VAD086357258	EXHIBITS UNLIMITED INC.	4335 WHEELER AVE.	ALEXANDRIA	VA	22304	SQG
VAD988171518	FEDERAL EXPRESS CORP	1200 N FAYETTE ST	ALEXANDRIA	VA	22014	SQG
VAD822885676	GALLERY PRODUCTIONS INC	5180 EISENHOWER AVE	ALEXANDRIA	VA	22304	SQG
VAD000528113	HAMIL AUTO TIA AUTO CRAFT BODY & PAINT COMPANY	6300 FARRINGTON AVENUE	ALEXANDRIA	VA	22304	SQG
VAD000008865	OTIS ELEVATOR CO	2915 BUSINESS CTR DR	ALEXANDRIA	VA	22314	SQG
VAD98111462	SYSTEMS MAINTENANCE BUILDING	195 TELEGRAPH RD	ALEXANDRIA	VA	22314	SQG
VAD982570865	TRAFFIC CONTROL OPERATIONS	1505 POWHATAN ST	ALEXANDRIA	VA	22314	SQG
VAD003128919	HERALD PROGRESS	112 THOMPSON ST	ASHLAND	VA	23005	SQG
VAD980714703	MUSTAR TERMINALS OPERATIONS PARTNERSHIP L.P.	18000 COCKPIT POINT RD	CUMFRIES	VA	22028	SQG
VAD000508057	ARIJET INC.	3000 MHE ROAD BLDG G	FREDERICKSBURG	VA	22408	SQG
VAD982574667	ARTELEGO INC	109 DEACON RD	FREDERICKSBURG	VA	22405	SQG
VAD000004200	CVS OF DC AND VA INC.	500 LANSOWNE RD	FREDERICKSBURG	VA	22408	LQG
VAD988196747	OILFIELD PIPE AND SUPPLY INC.	10780 OLD WASHINGTON HWY	GLEN ALLEN	VA	23060	SQG
VAD981045537	ALEXANDRIA METAL FINISHERS	9418 GUNSTON COVE RD	LORTON	VA	22079	LQG
VAD981113277	SWEDISH SERVICES INC	8249-C BACKLICK RD	LORTON	VA	22079	SQG
VAD052356623	KLI, INC. (formerly Keller Ladders Inc.)	15174 INDUSTRIAL DR	MILFORD	VA	22514	Corrective Action
VAD982656551	CARTER PRINTING CO	2027 N HAMILTON ST	RICHMOND	VA	23230	SQG
VAD003114337	CRENSHAW CORP	1700 COMMERCE DR	RICHMOND	VA	23224	SQG
VAD000209554	CSX TRANSPORTATION INC.	1 CSX ROAD	RICHMOND	VA	23230	SQG
VAD000508382	CSX TRANSPORTATION INC.	8300 SHELL RD	RICHMOND	VA	23231	SQG
VAD029305137	DUPONT SPRUANCE PLANT	5401 JEFFERSON DAVIS HWY	RICHMOND	VA	23234	LQG
VAD981937386	DEPT OF GEN SVCS CITY OF RICHMOND	2901 N BOULEVARD	RICHMOND	VA	23230	SQG
VAD049600811	GRAND EAGLE SERVICES	1001 EAST 4TH ST	RICHMOND	VA	23224	SQG
VAD022916505	NASH W W & SONS INC	1420 BROOK RD	RICHMOND	VA	23220	SQG
VAD058902036	RICHMOND TERMINAL	204 EAST FIRST ST	RICHMOND	VA	23224	SQG
VAD000519678	PPD DEVELOPMENT LLC	2200 TOMLYNN ST	RICHMOND	VA	23230	LQG
VAD086293719	FEC BIOREMEDIATION FACILITY	200 MAURY STREET	RICHMOND	VA	23224	Corrective Action
VAD000508830	AUTO FLEET SERVICE & AUTO COSMETICS	15045 FARM CREEK DR	WOODBIDGE	VA	22191	SQG
VAD98198271	AMOCO RESORTS-TANKS	13400 JEFFERSON DAVIS HWY	WOODBIDGE	VA	22191	SQG
VAD000521831	CVS PHARMACY #1404	13900 JEFFERSON DAVIS HWY	WOODBIDGE	VA	22191	LQG
VAD982675415	DOMINION PAY INC.	14847 PETERSISTENCE D	WOODBIDGE	VA	22191	SQG
VAD981939636	GOODYEAR AUTO SERVICE CENTER	13701 JEFFERSON DAVIS HWY	WOODBIDGE	VA	22191	SQG

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CERCLA Sites – seven in the same zip codes of the project corridor

EPA ID	Site Name	Address	City	State	Zip Code	Status
VAD020312013	Richmond, Fredericksburg & Potomac Railroad	Jefferson Davis & Hume	Alexandria	VA	22301	Not on NPL
VAD988201976	Alexandria Town Gas & Oronoco Outfall	Oronoco Street	Alexandria	VA	22314	Not on NPL

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VIRGINIA DEQ (continued)

(For response to comments 87 through 93, refer to page B-102)

VAD980714877	FMC Corp Spotsylvania City Industrial Park	US Route 17	Spotsylvania	VA	22408	Not on NPL
VA0000100099	White Oak Landfill	VA Route 218	White Oak	VA	22401	Not on NPL
VAN000306717	Charles City Road Illegal Drum Dump	2401 Charles City Road	Henrico	VA	23231	Not on NPL
VAN000305915	Chesapeake Bio-Fuel Company	1638 E. Commerce Street	Richmond	VA	23224	Not on NPL
VA7210020981	USA Woodbridge Research Facility	Dawson Beach Road	Woodbridge	VA	22191	Not on NPL

The above information related to hazardous wastes, RCRA/CERCLA sites can be accessed from EPA's websites at <https://www3.epa.gov/enviro/>, <https://rcrainfopreprod.epa.gov/rcrainfoweb/action/main-menu/view> and <https://www.epa.gov/superfund>

Formerly Used Defense Sites (FUDS) – none in close proximity to project corridor***Solid Waste – five in close proximity to project corridor***

Permit Number	Facility Name	Address	City	State	Zip Code	Status
SWP592	Aqua Clean Environmental of Virginia	710 Hospital St	Richmond	VA	23219	Closed
SWP296	E I du Pont de Nemours & Company - Spruance Plant	5401 Jefferson Davis Hwy	Richmond	VA	23234	Closed CDD Landfill
SWP079	E I du Pont de Nemours & Company - Spruance Plant	5401 Jefferson Davis Hwy	Richmond	VA	23234	Closed Industrial Landfill
SWP121	E I du Pont de Nemours & Company - Spruance Plant	5401 Jefferson Davis Hwy	Richmond	VA	23234	Closed Industrial Landfill
SWP225	E I du Pont de Nemours & Company - Spruance Plant	5401 Jefferson Davis Hwy	Richmond	VA	23234	Closed Industrial Landfill

Virginia Remediation Program (VRP) – ten in close proximity to project corridor

VRP ID	Site Name	Address	City	State	Zip Code	Type
VRP00241	Alexandria Town Gas	Oronoco Street	Alexandria	VA	22314	MGP
VRP00184	Carlyle-Block B (Formerly Block A,B, & C)	2099 Jamieson Avenue	Alexandria	VA	22314	Rail Yard
VRP00334	Arlington Industrial Property - North Tract	Old Jefferson Davis Highway	Arlington	VA	22202	Industry
VRP00560	Davis Industries Site (former)	311 Sixth Street South	Arlington	VA	22202	Industry
VRP00608	Long Bridge Park - Aquatics Center	475, 333, & 355 Long Bridge Drive	Arlington	VA	22202	Industry
VRP00257	General Products Company	3000 Mine Road	Fredericksburg	VA	22408	Industry
VRP00258	After Hours Formalwear, Inc.	3215 Williamsburg Road	Richmond	VA	23223	Dry Cleaner
VRP00395	VCU Social Services Parcel	1400 Oliver Hill Parkway	Richmond	VA	23219	Rail Yard
VRP00573	Richmond City Garage Complex	2905 North Boulevard	Richmond	VA	23230	Other
VRP00488	Station Plaza Shopping Center	13408-13450 Jefferson Davis Highway	Woodbridge	VA	22191	Dry Cleaner

Petroleum Releases – three hundred forty within the project corridor *Highlighted fields denote same address

VIRGINIA DEQ (continued)

(For response to comments 87 through 93, refer to page B-102)

PC Number	Site Name	Address	City	State	Zip Code	Release Date	Status
19910720	C and P Telephone	115 S Floyd St	Alexandria	VA	22304	11/16/1990	Closed
20073074	Ingebretson Charles Property	120 E Walnut St	Alexandria	VA	22301	10/6/2006	Closed
19891602	Washington Cold Storage Associates	1200 First St	Alexandria	VA	22314	5/25/1989	Closed
20003320	Federal Express Facility	1200 N Fayette St	Alexandria	VA	22314	4/14/2000	Closed
19891447	Federal Express	1200 N Fayette St	Alexandria	VA	22314	5/5/1989	Closed
20163141	Q Market Center	1200 N Henry St Ste A	Alexandria	VA	22314	1/27/2016	Closed
19993295	Crowder Property	1219 First St	Alexandria	VA	22314	3/11/1999	Closed
20053162	Public Broadcasting Service	1320 Braddock Pl	Alexandria	VA	22314	12/22/2004	Closed
19954130	Alexandria City Motor Equipment Division	133 S Quaker Ln	Alexandria	VA	22314	12/1/1994	Closed
20093175	Future T and ES RCPA Maintenance Facility	133 S Quaker Ln	Alexandria	VA	22314	4/14/2009	Closed
19890896	Oliver Carr Company	1930 Diagonal Rd	Alexandria	VA	22314	2/7/1989	Closed
19930571	WMATA	195 Telegraph Rd	Alexandria	VA	22314	9/17/1992	Closed
19920309	US Post Office - Alexandria Vehicle Maintenance	2300 Duke St	Alexandria	VA	22314	8/1/1991	Closed
19900462	USPS - Alexandria Vehicle Maintenance	2300 Duke St	Alexandria	VA	22314	10/16/1989	Closed
20003367	USPS Alexandria Vehicle Maintenance Facility	2300 Duke St	Alexandria	VA	22314	5/31/2000	Closed
19973027	Central Properties	2350 Duke St	Alexandria	VA	22314	9/4/1996	Closed
19973183	Commonwealth Atlantic Properties	2400 Duke St	Alexandria	VA	22314	5/2/1997	Closed
19901730	Jensen Manufacturing	2644 Duke St	Alexandria	VA	22314	6/7/1990	Closed
19911942	RF and P Train Derailment - KOH	2801 Jefferson Davis Hwy	Alexandria	VA	22301	6/23/1991	Closed
19820331	RF&P Potomac Yard Train Wreck	2801 Jefferson Davis Hwy	Alexandria	VA	22301	11/2/1981	Closed
20133083	DASH Alexandria Transit Authority	3000 Business Center Dr	Alexandria	VA	22314	10/20/2012	Closed
20013039	Jones Roofing Company Incorporated	3124 Colvin St	Alexandria	VA	22314	8/18/2000	Closed
19901502	Alexandria City Public School Maintenance	3540 Wheeler Ave	Alexandria	VA	22304	5/2/1990	Closed
20013080	Alexandria City Motor Equipment Division	3550 Wheeler Ave	Alexandria	VA	22304	10/19/2000	Closed
19920113	Alexandria City	3550 Wheeler Ave	Alexandria	VA	22304	7/18/1991	Closed
20173027	EZ Storage Wheeler Land LLLP Property	3640-3642 Wheeler Ave	Alexandria	VA	22314	7/27/2016	Closed
19940121	Construction Service Association	3650 Wheeler Ave	Alexandria	VA	22304	7/22/1993	Closed
20033067	Braddock Road Service Center former	401 E Braddock Rd	Alexandria	VA	22313	10/1/2002	Closed
19922176	Duke Shirley	4116 Wheeler Ave	Alexandria	VA	22304	5/22/1992	Closed
20043038	Claremont Business Center	4536-4598 Eisenhower Ave	Alexandria	VA	22304	8/27/2003	Closed
19880941	Bekins Moving and Storage	4604 Eisenhower Ave	Alexandria	VA	22304	5/11/1988	Closed
19910160	Carey Winston Company	5150 Eisenhower Ave	Alexandria	VA	22304	8/1/1990	Closed
20063075	Fitzgerald and Hartselle LLC Property	5409A Vine St	Alexandria	VA	22310	9/30/2005	Closed
19900664	William B Hopke Company	5421 Vine St	Alexandria	VA	22310	11/30/1989	Closed
19911031	William B Hopke Company	5421 Vine St	Alexandria	VA	22310	1/16/1990	Closed
19963041	VDOT - Alexandria City	5500 Clermont Dr	Alexandria	VA	22304	9/18/1995	Closed

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VIRGINIA DEQ (continued)

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19993283	Wayne Insulation	5509 Vine St	Alexandria	VA	22310	2/19/1999	Closed
19900689	Higham Company	5513 Vine St	Alexandria	VA	22310	12/4/1989	Closed
19940426	United Parcel Service	5601 Eisenhower Ave	Alexandria	VA	22304	9/10/1993	Closed
19942090	Boyd Property	5701 Vine St	Alexandria	VA	22310	2/14/1994	Closed
19943987	Boyd William E Property	5701 Vine St	Alexandria	VA	22310	5/18/1994	Closed
19920108	United Construction Services	5800 Farrington Ave	Alexandria	VA	22304	7/18/1991	Closed
19973152	Georgia Pacific Distribution Facility	5860 Farrington Ave	Alexandria	VA	22304	3/27/1997	Closed
19930798	VDOT - Van Dorn Area Headquarters	5910 McGuin Dr	Alexandria	VA	22310	10/16/1992	Closed
20063247	McClary Tile Incorporated	5918 Farrington Ave	Alexandria	VA	22304	5/18/2006	Closed
19891618	Ryder Truck Rental - Farrington Avenue	6100 Farrington Ave	Alexandria	VA	22304	5/26/1989	Closed
19922270	Premium Distributors	6600 Fleet Dr	Alexandria	VA	22310	6/12/1992	Closed
19911468	Premium Distributors	6600 Fleet Dr	Alexandria	VA	22310	4/8/1991	Closed
19932609	DMV	Powhatan St N Henry St and Slaters Ln	Alexandria	VA	22314	6/30/1993	Closed
20023191	Plantation Pipe Line - CSX Rail Line	S Duke St and Dove St	Alexandria	VA	22314	3/13/2002	Closed
20113249	Crystal Park Condominiums	1805 Crystal Dr	Arlington	VA	22202	6/22/2011	Closed
20013073	Hyatt Regency Crystal City	2799 Jefferson Davis Hwy	Arlington	VA	22202	10/9/2000	Closed
19943037	Ready Mix former	300 S 6th St	Arlington	VA	22202	3/27/1994	Closed
19870121	Davis Industries - RF&P	311 S 6th St	Arlington	VA	22202	8/8/1986	Closed
19901416	Davis Industries - RF and P	311 S 6th St	Arlington	VA	22202	4/20/1990	Closed
20083258	North Tract Lofts Property	305 S 10th St	Arlington	VA	22202	4/24/2008	Closed
19869985	Exxon 25644	355 Old Jefferson Davis Hwy	Arlington	VA	22202	1/10/1986	Closed
19910038	Exxon 25644	355 Old Jefferson Davis Hwy	Arlington	VA	22202	5/4/1990	Closed
19920213	Exxon 25644	355 Old Jefferson Davis Hwy	Arlington	VA	22202	7/30/1991	Closed
19910928	NPS - Maintenance Yard	2700 George Washington Memorial Pkwy	Arlington	VA	22201	12/28/1990	Closed
19890460	RFP Yard	400 Blk Old Jefferson Davis Hwy	Arlington	VA	22202	10/28/1988	Closed
19911566	RF and P Facility	400 Blk Old Jefferson Davis Hwy	Arlington	VA	22202	4/24/1991	Closed
19900555	RFP Yard	400 Blk Old Jefferson Davis Hwy	Arlington	VA	22202	1/30/1990	Closed
19993399	Cardinal Concrete	450 Old Jefferson Davis Hwy	Arlington	VA	22201	6/1/1999	Closed
19911565	RF and P Facility	700 Ball St	Arlington	VA	22202	4/24/1991	Closed
19880272	MWAA - Reagan Airport - National Car Rental	Airport Entrance Rd and Smith Blvd	Arlington	VA	22202	9/21/1987	Closed
19940187	MWAA - National Car Rental	Airport Entrance Rd and Smith Blvd	Arlington	VA	22202	7/30/1993	Closed
19940186	MWAA - Ogden Tank Farm	Engineering and Maintenance Division MA120	Arlington	VA	22202	7/30/1993	Closed
19940189	MWAA - Ogden Tank Farm Lines	Engineering and Maintenance Division MA120	Arlington	VA	22202	7/30/1993	Closed
19984369	Ashland Maintenance Shop	Vaughan Rd	Ashland	VA	23005	5/11/1998	Closed

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VIRGINIA DEQ (continued)

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20004069	Iron Horse Restaurant	100 S Railroad Ave	Ashland	VA	23005	8/10/1999	Closed
20018179	Berry John Residence	1000 Center St	Ashland	VA	23005	5/29/2001	Closed
20044109	Hodges John Residence	106 Howard St	Ashland	VA	23005	8/20/2003	Closed
20164353	Ashland Manor Apartments	110 Cox Ln	Ashland	VA	23005	2/16/2016	Closed
20034102	Franck Charles Property	11465 Cedar L	Ashland	VA	23005	9/17/2002	Closed
20124650	Randolph Macon College	115 N Railroad Ave	Ashland	VA	23005	5/23/2012	Closed
20054049	Ashland Feed Store	120 Thompson St	Ashland	VA	23005	7/21/2004	Closed
20004679	Wehman Residence	321 Duncan St	Ashland	VA	23005	6/14/2000	Closed
20104011	Randolph Macon College	505 N Center St	Ashland	VA	23005	7/27/2009	Closed
20114436	Pecora Theresa Residence	805 S Center St	Ashland	VA	23005	4/29/2011	Closed
19942343	Morris Super Market	Route 1 and 636	Ashland	VA	23005	2/28/1994	Closed
19910732	Southern International	Route 657	Ashland	VA	23005	11/20/1990	Closed
19921860	7 Eleven 19929	10121 Chester Rd	Chester	VA	23831	4/6/1992	Closed
19994053	7 Eleven 19929	10121 Chester Rd	Chester	VA	23831	8/10/1998	Closed
19974154	Rental Property	5017 Douglas Ave	Chesterfield	VA	23234	1/8/1997	Closed
19941171	CSX Transportation	Off Route 668	Claborn	VA	22408	1/7/1994	Closed
20154458	Bohannon Edwin Property	15384 Taylorsville Rd	Doswell	VA	23047	4/28/2015	Closed
20053063	Cockpit Point Property	1285 Cherry Hill Rd	Dumfries	VA	22026	5/5/2004	Closed
19921183	Sun Oil Facility	18000 Cockpit Point Rd	Dumfries	VA	22026	1/3/1992	Closed
20013228	Dominion Possum Point Power Station	19000 Possum Point Rd	Dumfries	VA	22026	4/6/2001	Closed
19921506	Virginia Power - Possum Point	19000 Possum Point Rd	Dumfries	VA	22026	8/18/1992	Closed
19983621	Virginia Power - Possum Point	19000 Possum Point Rd	Dumfries	VA	22026	12/9/1997	Closed
19910440	VDOT - 607 Deacon Rd	607 Deacon Rd	Falmouth	VA	22405	9/24/1990	Closed
19900316	VDOT - Fredericksburg District Shop	87 Deacon Rd	Falmouth	VA	22405	9/12/1989	Closed
19993223	VDOT - Fredericksburg District Shop	87 Deacon Rd	Falmouth	VA	22405	1/8/1999	Closed
19942721	Surgicenter	223 Willow St	Fredericksburg	VA	22405	6/15/1994	Closed
19963072	VDOT - Todd Gas	123 White Oak Rd	Fredericksburg	VA	22405	11/7/1995	Closed
19911131	Todd Gas Station	123 White Oak Rd	Fredericksburg	VA	22405	2/6/1991	Closed
20063064	Sorto Baires Amilcar Property	1320 Rail Road Ave	Fredericksburg	VA	22401	9/20/2005	Closed
19993332	General Products Company Incorporated	3000 Mine Rd	Fredericksburg	VA	22408	4/19/1999	Closed
19930301	General Products Company Incorporated	3000 Mine Rd	Fredericksburg	VA	22408	8/13/1992	Closed
20183039	Wilson Real Estate Property	301 Lafayette Blvd	Fredericksburg	VA	22401	8/16/2017	Closed
20013092	Sheridan Books Incorporated	3591 Lee Hill Dr	Fredericksburg	VA	22408	10/30/2000	Closed
19954267	General Products - Frackelton Cinder Block	400 Howison Rd	Fredericksburg	VA	22401	6/13/1995	Closed
19890710	Cooper Service Station	411 Lafayette Blvd	Fredericksburg	VA	22401	12/23/1988	Closed
19973136	Perma Treat Exterminating	507 Lafayette St	Fredericksburg	VA	22401	2/18/1997	Closed
19940032	A L Bennett Funeral Home	515 Princess Anne St	Fredericksburg	VA	22401	7/8/1993	Closed
19901398	Bobs Service Center	620 Lafayette Blvd	Fredericksburg	VA	22401	4/17/1990	Closed
20023044	Atlantic Oil former	Gunnery and Dunmore Rds	Fredericksburg	VA	22401	8/15/2001	Closed

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VIRGINIA DEQ (continued)

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20173110	Plantation Pipeline Release at Lansdowne Rd	Lansdown Rd and CSX Right of Way	Fredericksburg	VA	22401	12/14/2016	Open
19860125	General Products Well	Rte 2 and Rte 17	Fredericksburg	VA	22408	8/9/1985	Closed
20064327	Snead Linda Residence	10598 Purcell Rd	Glen Allen	VA	23060	12/9/2005	Closed
20134028	Snead Linda Residence	10598 Purcell Rd	Glen Allen	VA	23060	7/19/2012	Closed
20124148	Wilson Vera Residence	11001 Old Washington Hwy	Glen Allen	VA	23060	9/21/2011	Closed
19911107	Chisholm Site	11491 Old Washington Hwy	Glen Allen	VA	23060	1/31/1991	Closed
19911794	Glen Allen Service Center Inc	3011 Mountain Rd	Glen Allen	VA	23060	12/31/1991	Closed
19994228	Primary Corp Bickerstaff	413 Bickerstaff Rd	Henrico	VA	23231	11/2/1998	Closed
19994178	Primary Corp Bickerstaff	413 Bickerstaff Rd	Henrico	VA	23231	11/30/1998	Closed
20123150	Brandywine Auto Parts	10212 Richmond Hwy	Lorton	VA	22199	1/20/2012	Closed
20053236	Cinderbed Road Property	7820 Cinderbed Rd	Lorton	VA	22079	3/31/2005	Closed
19910871	Worthington Industries	7820 Cinderbed Rd	Lorton	VA	22079	12/12/1990	Closed
19911550	Worthington Industries	7820 Cinderbed Rd	Lorton	VA	22079	4/23/1991	Closed
20003005	AMTRAK-Auto Train Complex	8006 Lorton Rd	Lorton	VA	22079	7/12/1999	Closed
19920862	GDC Trucking	8100 Mims St	Lorton	VA	22079	11/6/1991	Closed
19932452	GDC Trucking Incorporated	8100 Mims St	Lorton	VA	22079	6/6/1993	Closed
19943192	GDC Property - Former	8100 Mims St	Lorton	VA	22079	3/31/1994	Closed
19963159	Potomac Valley Brick	8306 Cinder Bed Rd	Lorton	VA	22079	4/16/1996	Closed
19942503	US Post Office - Milford	15429 Antioch Rd	Milford	VA	22427	6/13/1994	Closed
19870477	US Postal Service - Milford	15429 Antioch Rd	Milford	VA	22427	1/13/1987	Closed
19973202	VDOT - Routes 1 and I-95 N	Routes 1 and Interstate 95 N	Lorton	VA	22079	6/4/1997	Closed
19910284	Keller Industries	16174 Industrial Dr	Milford	VA	22514	8/23/1990	Closed
20013113	Keller Ladders Incorporated	16174 Industrial Dr	Milford	VA	22514	12/4/2000	Closed
20073169	Lorton Gas Station	9308 Gunston Cove Rd	Lorton	VA	22079	12/21/2006	Closed
20003384	American Stone Mix	16326 Industrial Dr	Milford	VA	22514	6/20/2000	Closed
20013030	American Stone Mix	16326 Industrial Dr	Milford	VA	22514	6/21/2000	Closed
19983660	7001 Newington Road	7001 Newington Rd	Newington	VA	22079	1/14/1998	Closed
20093055	American Stone Facility former	7901 Cinder Bed Rd	Lorton	VA	22079	9/25/2008	Closed
20163049	WMATA Bus Maintenance Facility	7901 Cinder Bed Rd	Lorton	VA	22079	9/9/2015	Closed
19983673	R E Lee Electric Company Incorporated	8207 Backlick Rd	Newington	VA	22122	2/18/1998	Closed
19954009	Newington Concrete	8413 Terminal Rd	Newington	VA	22122	7/13/1994	Closed
19993059	Research Development Property	8417A Terminal Rd	Newington	VA	22122	8/17/1998	Closed
19910997	Waste Management Company Facility	8421 Terminal Rd	Newington	VA	22122	1/11/1991	Closed
20093090	Quantico Boots	313 Potomac Ave	Quantico	VA	22134	11/24/2008	Closed
20173462	MCB Quantico Utility Trench	69 Bauer Rd	Quantico	VA	22134	6/26/2017	Open
19949302	Quantico MCB Building 2012 Central Heating Plant	MCB Quantico	Quantico	VA	22134	10/27/1993	Closed
19973055	Quantico MCB OCS Service Station	MCB Quantico	Quantico	VA	22134	9/27/1996	Closed

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19954234	Quantico MCB Motor Transport Site 3231	MCB Quantico	Quantico	VA	22134	4/3/1995	Closed
19983558	Quantico MCB Building 5121 OCS Sewage Pumping Sta	MCB Quantico	Quantico	VA	22134	6/20/1997	Closed
19983644	Quantico MCB Former Fire Trng Site 14	MCB Quantico	Quantico	VA	22134	1/15/1998	Closed
19983645	Quantico MCB Aero Club Site 18	MCB Quantico	Quantico	VA	22134	1/15/1998	Closed
19983739	Quantico MCB Little Hall Parking Lot	MCB Quantico	Quantico	VA	22134	4/22/1998	Closed
20023258	Quantico MCB - Building 3254 (Main Side)	MCB Quantico	Quantico	VA	22134	6/20/2002	Closed
19891436	Quantico MCB - Newlinn Hall	MCB Quantico	Quantico	VA	22134	5/4/1989	Closed
19930108	Quantico MCB Buildings 5106B and C Aero Club	MCB Quantico	Quantico	VA	22134	7/15/1992	Closed
19930378	Quantico MCB Building 3141	MCB Quantico	Quantico	VA	22134	8/21/1992	Closed
19931911	Quantico MCB - Building 3000	MCB Quantico	Quantico	VA	22134	4/2/1993	Closed
19931912	Quantico MCB - Building 2012 - Tanks 1728, 29, 30	MCB Quantico	Quantico	VA	22134	4/2/1993	Closed
19932350	Quantico Marine Corps Base - Building 2113	MCB Quantico	Quantico	VA	22134	5/25/1993	Closed
20153037	MCB Quantico Obstacle Course	MCB Quantico	Quantico	VA	22314	8/7/2014	Closed
19994208	Sams Phillips 66	100 E Belt Blvd	Richmond	VA	23224	12/14/1998	Closed
19931160	CSX Acca Yard	1 CSX Rd	Richmond	VA	23230	1/14/1994	Closed
19932493	CSX Acca Yard	1 CSX Rd	Richmond	VA	23230	1/14/1994	Closed
19922397	Locomotive Repair Shop	1 CSX Rd	Richmond	VA	23230	6/25/1992	Closed
19964149	Taylor Residence	1000 Arizona Dr	Richmond	VA	23224	3/7/1996	Closed
19901278	Richmond Plant	1000 E 4th St	Richmond	VA	23224	3/28/1990	Closed
20064332	VCU Steam Plant	1020 N Oliver Hill Way	Richmond	VA	23219	11/17/2005	Closed
20164328	Turlington E L Jr Residence	104 Portland Pl	Richmond	VA	23221	1/21/2016	Open
20154425	108 Nicholson Street	108 Nicholson St	Richmond	VA	23231	3/16/2015	Closed
19911401	Richmond Foundry Mfg Co	1100 Hermitage Rd	Richmond	VA	23220	3/28/1991	Closed
19911861	Venable Seed Company	1103 N 17th St	Richmond	VA	23219	6/10/1991	Closed
19940384	Lone Star Richmond Truck Shop	111 N Nicholson St	Richmond	VA	23223	9/2/1993	Closed
20124425	Wellford Randolph Property	1111 N Thompson St	Richmond	VA	23230	1/18/2012	Closed
20104625	McCauley Thelma Residence	1118 Floral Ave	Richmond	VA	23224	6/7/2010	Closed
20154041	1136 Hermitage Rd Property	1136 Hermitage Rd	Richmond	VA	23220	7/17/2014	Closed
20034387	Bishop Maxene Residence	120 Barteet Rd	Richmond	VA	23224	3/26/2003	Closed
20104661	Wilkes Patsy G Residence	1200 Floral Ave	Richmond	VA	23224	6/21/2010	Closed
20114013	Watson Audrey Residence	1207 Floral Ave	Richmond	VA	23224	7/13/2010	Closed
20184042	Hanson Pipe and Products Inc - School Street	1207 School St	Richmond	VA	23220	8/16/2017	Open
20104660	Ivey Joyce Residence	1212 Floral Ave	Richmond	VA	23224	6/18/2010	Closed
20114048	Neal Neva M Residence	1218 Floral Ave	Richmond	VA	23224	8/3/2010	Closed
20114074	Blake Bridget Residence	1219 Floral Ave	Richmond	VA	23224	8/16/2010	Closed
19984222	Jefferson National Bank	130 E Belt Blvd	Richmond	VA	23224	2/13/1998	Closed
20004272	Kelleher Cooling and Heating	1301 School St	Richmond	VA	23220	11/16/1999	Closed

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(For response to comments 87 through 93, refer to page B-102)

20024233	Kelleher Corp	1301 School St	Richmond	VA	23220	2/5/2002	Closed
20014890	Hughes Residence	1307 Boroughbridge Rd	Richmond	VA	23225	3/27/2001	Closed
20014724	Poe Residence	1315 Boroughbridge Rd	Richmond	VA	23225	3/14/2001	Closed
20004176	Anderson Property	1316 Evergreen Ave	Richmond	VA	23224	9/20/1999	Closed
20114365	Stephens Johnnie M Residence	1343 Evergreen Ave	Richmond	VA	23224	3/11/2011	Closed
20124367	Allen Joseph Residence	1350 Evergreen Ave	Richmond	VA	23224	11/30/2011	Closed
20024289	Purnell Robin Residence	1355 Evergreen Ave	Richmond	VA	23224	3/12/2002	Closed
19921452	Gas Lab Annex	14 N 15th St	Richmond	VA	23219	2/20/1992	Closed
20084125	Wilson Darryl G Residence	1400 Kingswood St	Richmond	VA	23224	8/27/2007	Closed
20084123	Gladden Sylvia S Residence	1401 Kingswood St	Richmond	VA	23224	8/27/2007	Closed
20044432	Rex Lumber Company Former	1405 Valley Rd	Richmond	VA	23222	2/11/2004	Closed
20084155	Wells Alice M Residence	1406 Kingswood St	Richmond	VA	23224	9/12/2007	Closed
20084200	Jones Andrea H Property	1413 Kingswood St	Richmond	VA	23224	10/5/2007	Closed
19880205	National Linen Service	1414 Chamberlayne Ave	Richmond	VA	23222	6/20/1990	Closed
20034297	Usry Properties Building	1415 Chamberlayne Ave	Richmond	VA	23222	12/31/2002	Closed
20104098	Usry Properties Building	1415 Chamberlayne Ave	Richmond	VA	23222	9/22/2009	Closed
20094475	Town and Country Mechanical	1416 Webster St	Richmond	VA	23220	5/8/2009	Closed
20084305	Thomas Johnnie L Residence	1419 Kingswood St	Richmond	VA	23224	11/15/2007	Closed
20014019	Jackson Residence	1424 Kingwood St	Richmond	VA	23224	7/11/2000	Closed
20134537	Ranson Barbara M Residence	1426 Sunbury Rd	Richmond	VA	23224	6/14/2013	Closed
20104619	Robinson Dorothy L Residence	1436 Greystone Ave	Richmond	VA	23224	5/24/2010	Closed
20114120	Eggleston Karen Residence	1437 Greystone Ave	Richmond	VA	23224	9/24/2010	Closed
20104129	David Annette Residence	1442 Greystone Ave	Richmond	VA	23224	9/22/2009	Closed
19910435	U S Army Corp	14th and Byrd St	Richmond	VA	23219	9/9/1990	Closed
19901403	Industrial Alloy Fabricators	1501 Valley Rd	Richmond	VA	23222	4/19/1990	Closed
19911227	Industrial Alloy Fabricators Inc	1501 Valley Rd	Richmond	VA	23222	2/25/1991	Closed
20124063	Provo Debra Property	1509 Catalina Dr	Richmond	VA	23224	8/8/2011	Closed
19890028	Garretts Auto Union 76 Station	1504 N Hamilton St	Richmond	VA	23230	7/8/1988	Closed
19890914	Union 76 Station	1504 N Hamilton St	Richmond	VA	23230	11/20/1990	Closed
20084434	Garretts Auto Union 76 Station	1504 N Hamilton St	Richmond	VA	23230	2/1/2008	Closed
20004247	Southern Warehouses Inc	1510 Webster St	Richmond	VA	23220	11/4/1999	Closed
20018186	Steele Richard Residence	1517 Sunset Ln	Richmond	VA	23221	6/5/2001	Closed
19880385	Reams Coal and Oil	1520 E Marshall St	Richmond	VA	23234	12/21/1990	Closed
19994300	Martin Brothers Roofing	1531 Saint James St	Richmond	VA	23222	2/5/1999	Closed
19901117	Lovings Produce Co	1601 E Grace St	Richmond	VA	23219	2/28/1990	Closed
20044675	1607 Sunbury Road	1607 Sunbury Rd	Richmond	VA	23224	6/4/2004	Closed
20084363	Owens Alice M Residence	1607 Sunbury Rd	Richmond	VA	23224	12/17/2007	Closed
20084388	Tuck Hazel B Residence	1610 Sunbury Rd	Richmond	VA	23224	12/27/2007	Closed
19940844	Spur Station Former	1615 E Broad St	Richmond	VA	23220	11/17/1993	Closed
20084278	Robinson Jr Thurman D Residence	1616 Sunbury Rd	Richmond	VA	23224	11/8/2007	Closed
20084389	Eubanks Wilford W Residence	1619 Sunbury Rd	Richmond	VA	23224	12/27/2007	Closed

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(For response to comments 87 through 93, refer to page B-102)

20124141	Woodfin Oil 926	1625 N Hamilton Ave	Richmond	VA	23230	9/9/2011	Closed
20084402	Greene Jr Danver Residence	1625 Sunbury Rd	Richmond	VA	23224	11/26/2007	Closed
19964126	Little Oil Company Terminal	1638 Commerce Rd	Richmond	VA	23224	2/7/1996	Closed
19953223	Little Oil Richmond Terminal	1638 Commerce Rd	Richmond	VA	23224	5/11/1995	Closed
19974164	Little Oil Company Terminal	1638 Commerce Rd	Richmond	VA	23224	1/21/1997	Closed
19901489	Southern Fuel Oils Inc	1640 Commerce Rd	Richmond	VA	23224	5/1/1990	Closed
19911519	Richmond Flood Wall	16th and Dock St	Richmond	VA	23224	4/17/1991	Closed
19931691	Richmond Flood Wall	16th and Dock St	Richmond	VA	23224	3/4/1993	Closed
19931135	Richmond Flood Wall	16th and Dock St	Richmond	VA	23224	12/16/1992	Closed
20094493	Richmond Cold Storage - E Marshall St	1700 E Marshall St Bldg 2	Richmond	VA	23223	5/22/2009	Closed
19920810	Exxon 20077 Shockhoe Bottom	1701 E Broad St	Richmond	VA	23223	6/30/1992	Closed
20114352	Uppys 23	1701 E Broad St	Richmond	VA	23223	3/10/2011	Closed
20064100	Raven Apartments Proposed	1710 E Broad St	Richmond	VA	23223	8/22/2006	Closed
19900512	W S Pinchbeck Inc	1701 Sunbury Rd	Richmond	VA	23224	10/25/1989	Closed
19900513	W S Pinchbeck Inc	1701 Sunbury Rd	Richmond	VA	23224	10/25/1989	Closed
19900514	W S Pinchbeck Inc	1701 Sunbury Rd	Richmond	VA	23224	10/25/1989	Closed
19921871	Lee Hy Paving Corp	1721 Darbytown Rd	Richmond	VA	23231	4/7/1992	Closed
19911657	McGuire Motors Inc	1740 E Belt Blvd	Richmond	VA	23224	5/13/1991	Closed
19901443	VDOT 17th and Dock St	17th and Dock St	Richmond	VA	23219	5/25/1990	Closed
19901615	VDOT 17th and Dock St	17th and Dock St	Richmond	VA	23219	5/17/1990	Closed
20054151	Shockoe Valley Fugitive Tanks - Gaston	17th St and 195	Richmond	VA	23219	9/3/2004	Closed
20004234	Tipton Enterprises	1800 Summit Ave	Richmond	VA	23230	10/27/1999	Closed
20164400	Symbol Mattress	1814 High Point Ave	Richmond	VA	23230	3/29/2016	Closed
20134289	BC Architects Engineers Property	1850 Commerce Rd	Richmond	VA	23224	1/14/2013	Closed
19953234	Southern Brick and Supply Co Inc	1900 Roseneath Rd	Richmond	VA	23230	6/2/1995	Closed
20114292	James River Petroleum - Lubricant Storage Facility	1901 Roseneath Rd	Richmond	VA	23230	2/4/2011	Closed
19901613	Industrial Supply Corporation	1905 Westwood Ave	Richmond	VA	23227	5/16/1990	Closed
19890022	Philip Morris	19th and Cary St	Richmond	VA	23224	7/6/1988	Closed
20018076	American Legion Post 137	2 Chuckatuk Ave	Richmond	VA	23224	3/30/2001	Closed
20004367	Bowden Property	2 E Belt Blvd	Richmond	VA	23224	1/12/2000	Closed
19994119	Southside Builders Supply	20 Westover Hills Blvd	Richmond	VA	23225	10/2/1998	Closed
19964185	Southside Builders Supply	20 Westover Hills Blvd	Richmond	VA	23225	4/1/1996	Closed
19911188	Manchester Board and Paper	200 Orleans St	Richmond	VA	23231	2/15/1991	Closed
19940557	First Energy Corporation	200 Maury St	Richmond	VA	23218	6/2/1993	Closed
19940982	First Energy Corporation	200 Maury St	Richmond	VA	23218	12/1/1993	Closed
20074258	First Energy Corporation	200 Maury St	Richmond	VA	23218	10/18/2006	Closed
20074298	Kinder Morgan Southeast Terminals - Richmond Term	2000 Trenton Ave	Richmond	VA	23234	11/21/2006	Closed
19943253	McLane Construction Co	2036 Botetourt St	Richmond	VA	23220	4/4/1994	Closed
20184057	Magellan Terminals Holdings LP - Richmond Terminal	204 E First St	Richmond	VA	23224	8/10/2017	Open

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20014451	Baldwin Site	2040 Botetourt St	Richmond	VA	23220	12/27/2000	Closed
19920753	Baldwin Site	2040 Botetourt St	Richmond	VA	23220	10/22/1991	Closed
20044034	City Auto Wrecking Incorporated Former	2050 W Moore St	Richmond	VA	23220	7/16/2002	Closed
20144172	Rountree Jeff and Lisa Residence	206 Portland Pl	Richmond	VA	23221	11/5/2013	Closed
19931290	MPN Industries	2100 Commerce Rd	Richmond	VA	23234	1/5/1993	Closed
19944273	Falling Creek WWTP	2100 Station Rd	Richmond	VA	23237	6/13/1994	Closed
19984142	Falling Creek WWTP	2100 Station Rd	Richmond	VA	23237	12/30/1997	Closed
19990220	Falling Creek Wastewater Plant	2100 Station Rd	Richmond	VA	23237	7/31/1992	Closed
19930242	Michel Real Estate	2101 E Belt Blvd	Richmond	VA	23224	8/4/1992	Closed
19901797	Crewe Transfer Inc	2114 Bellemeade Rd	Richmond	VA	23224	6/20/1990	Closed
20014147	Ponn Residence	213 Plazaview Rd	Richmond	VA	23224	9/8/2000	Closed
19931651	RF and P Office Building	2134 W Laburnum Ave	Richmond	VA	23230	3/1/1993	Closed
19940615	Timlaph Property Former	217 Maury St	Richmond	VA	23224	10/12/1993	Closed
19953225	Kenan Transport Co	2201 E Belt Blvd	Richmond	VA	23224	5/22/1995	Closed
19920748	Barnes Const Co Inc	2221 E Belt Blvd	Richmond	VA	23224	10/21/1991	Closed
20074221	TenCarva Machinery	2231 E Belt Blvd	Richmond	VA	23224	10/13/2006	Closed
20084537	Dutton Jack Property	225 Plaza View	Richmond	VA	23224	3/19/2008	Closed
19891771	Ryder Truck Rental	2300 Station Rd	Richmond	VA	23234	6/19/1989	Closed
20074447	Tawes Jackie Residence	2407 Aberdeen Rd	Richmond	VA	23237	1/25/2007	Closed
19940054	Ryer Residence	2407 Breckenridge Rd	Richmond	VA	23225	7/13/1993	Closed
19974198	Ryer Residence	2407 Breckenridge Rd	Richmond	VA	23225	3/10/1997	Closed
20114142	Yeary LLC Property	2414 Breckenridge Rd	Richmond	VA	23225	9/22/2010	Closed
20054231	Totty Carolyn Residence	2419 Aberdeen Rd	Richmond	VA	23237	9/22/2004	Closed
20094237	Cecil Patricia B Property	2432 Breckenridge Rd	Richmond	VA	23225	12/4/2008	Closed
20064528	Spain Ronald Property	2507 Dwight Ave	Richmond	VA	23237	4/5/2006	Closed
19880303	McEwen Lumber Company	2508 Hermitage Rd	Richmond	VA	23230	10/1/1987	Closed
19890299	American Tobacco Co	2620 E Cary St	Richmond	VA	23223	8/1/1988	Closed
19974275	American Tobacco Co	2620 E Cary St	Richmond	VA	23223	5/15/1997	Closed
20084187	Lucky Strike Power Plant	2700 E Cary St	Richmond	VA	23223	9/27/2007	Closed
19964199	Greyhound Terminal	2910 N Boulevard	Richmond	VA	23230	5/2/1996	Closed
19920100	Greyhound Terminal	2910 N Boulevard	Richmond	VA	23230	7/16/1991	Closed
20094557	TMS Corporation	3001 E Parham Rd	Richmond	VA	23228	6/23/2009	Closed
19910630	Tarmac Ready Mix Concrete Plant	3011 Dock St	Richmond	VA	23223	10/25/1990	Closed
19942762	Tarmac Ready Mixed Concrete Plant	3011 Dock St	Richmond	VA	23223	3/10/1994	Closed
20164317	Barlow Ronald Residence	3020 Pinehurst Rd	Richmond	VA	23228	1/27/2016	Closed
19964064	Froehling and Robertson Inc	3015 Dumbarton Rd	Richmond	VA	23228	9/26/1995	Closed
19953158	Froehling and Robertson Inc	3015 Dumbarton Rd	Richmond	VA	23228	3/3/1995	Closed
20034156	Perry Kenneth Residence	3029 Kingsland Rd	Richmond	VA	23237	10/18/2002	Closed
19901282	Lehigh Portland Cement Co	3111 Water St	Richmond	VA	23223	3/29/1990	Closed
20064375	Solomon Louis Property	3131 Southside Ave	Richmond	VA	23228	1/20/2006	Closed
20164376	Fulton Gas Works	3301 Williamsburg Ave	Richmond	VA	23223	3/4/2016	Closed

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19931040	Liphart Steel Company Inc	3308 Rosedale Ave	Richmond	VA	23230	11/24/1992	Closed
20104372	Croxton Sara Residence	3418 W Franklin St	Richmond	VA	23221	1/15/2010	Closed
19920382	Penn Market Properties Ltd	3600 W Broad St	Richmond	VA	23230	6/30/1992	Closed
19942925	7 Eleven 30480	3600 W Cary St	Richmond	VA	23221	3/17/1994	Closed
20064099	Hogge Avis H Property	3714 Ellwood Ave	Richmond	VA	23220	8/22/2005	Closed
20024254	Sanko Auto Parts	3716 W Broad St	Richmond	VA	23230	2/28/2002	Closed
20094033	Hewitt Associates Property	3801 Stuart Ave	Richmond	VA	23221	7/21/2008	Closed
20044428	McGowan Jean Residence	3803 Stuart Ave	Richmond	VA	23221	2/20/2004	Closed
20154060	Harris William H III and Gail E Residence	3805 Queen Charlotte Rd	Richmond	VA	23221	8/7/2014	Closed
19974291	CSC Equipment and Supply Co	3805 Talley Rd	Richmond	VA	23228	6/20/1997	Closed
20054550	Wise Karen Residence	3806 Dover Rd	Richmond	VA	23221	3/30/2005	Closed
20004396	New Residence	3806 Tomace Rd	Richmond	VA	23221	2/8/2000	Closed
20034183	Newman Karen Residence	3807 Dover Rd	Richmond	VA	23221	11/6/2002	Closed
20064124	Claude E Bevan Residence	3809 Kensington Ave	Richmond	VA	23221	8/26/2005	Closed
20014976	Reeves Residence	3810 Dover Rd	Richmond	VA	23221	3/29/2001	Closed
20084401	Gray Donald L Residence	4200 Sheffield Rd	Richmond	VA	23224	11/26/2007	Closed
20084198	Hayes Otis P Residence	4210 Sheffield Rd	Richmond	VA	23224	10/5/2007	Closed
20084303	Stoots Sherman B Residence	4216 Sheffield Rd	Richmond	VA	23224	11/15/2007	Closed
20084543	Allen Jr Leamon Residence	4301 Clarkson Rd	Richmond	VA	23224	3/12/2008	Closed
20084544	Brown Hazel L Residence	4307 Clarkson Rd	Richmond	VA	23234	3/12/2008	Closed
20034469	Crown Terminal Former	4400 E Main St	Richmond	VA	23231	4/23/2003	Closed
19940866	Crown Richmond Terminal	4405 E Main St	Richmond	VA	23231	11/12/1993	Closed
19900531	Crown Richmond Terminal	4405 E Main St	Richmond	VA	23231	8/19/1988	Closed
20144016	Cafritz Diane Residence	4510 Cary St	Richmond	VA	23221	7/22/2013	Closed
19930617	M and Q Plastics	4725 Jefferson Davis Hwy	Richmond	VA	23234	9/23/1992	Closed
20054362	Quick Way Facility Former	4923 Old Midlothian Tpke	Richmond	VA	23224	12/8/2004	Closed
19910016	Quick Way Inc	4923 Old Midlothian Tpke	Richmond	VA	23224	7/5/1990	Closed
19920142	Pond 3 Richmond Flood Wall	4th St and Gordon Ave	Richmond	VA	23224	7/22/1991	Closed
20018223	Chaffin Lyn Residence	5003 Douglas Ave	Richmond	VA	23234	6/12/2001	Closed
19920223	VDOT Equipment Division	503 Bickerstaff Rd	Richmond	VA	23224	1/8/1992	Closed
19921545	BMG Metals Inc	5100 Old Osborne Tpke	Richmond	VA	23231	3/10/1992	Closed
19932318	BMG Metals Inc	5100 Old Osborne Tpke	Richmond	VA	23231	5/19/1993	Closed
20174322	Balloun Robert Residence	5112 Boscobel Ave	Richmond	VA	23225	3/8/2017	Closed
20104194	Romero Kathleen P Residence	5206 Dorchester Rd	Richmond	VA	23225	10/27/2009	Closed
19994430	Harris Residence	5224 Pinecrest Ave	Richmond	VA	23225	5/3/1999	Closed
20054488	Former Hughes Loretta Property	5238 Jahnke Rd	Richmond	VA	23225	2/24/2005	Closed
19940277	CSX Fulton Yard	5310 Newton Rd	Richmond	VA	23231	8/13/1993	Closed
19880604	CSX Fulton Yard	5310 Newton Rd	Richmond	VA	23231	2/2/1988	Closed
19930134	CSX Fulton Yard	5310 Newton Rd	Richmond	VA	23231	6/11/1992	Closed
19900861	Forest View Vol Rescue Squad	5327 Forest Hill Ave	Richmond	VA	23225	1/12/1990	Closed
19940997	Bethany Christian Church	5400 Forest Hill Ave	Richmond	VA	23225	12/2/1993	Closed

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19931046	General Electric Co	5401 Staples Mill Rd	Richmond	VA	23228	11/25/1992	Closed
20074278	Wright Rebecca Residence	5406 Dorchester Rd	Richmond	VA	23225	11/7/2006	Closed
20084209	Haener Barbara S Property	5423 Dorchester Rd	Richmond	VA	23225	10/9/2007	Closed
20114545	Holt Ronald T Property	5426 Dorchester Rd	Richmond	VA	23225	6/29/2011	Closed
20034076	Ring Diana Residence	5432 Dorchester Rd	Richmond	VA	23223	8/20/2002	Closed
20044419	Former Joyner Charles Residence	5502 Dorchester Rd	Richmond	VA	23225	2/17/2004	Closed
20024142	Messitt Peter Residence	5503 Dorchester Rd	Richmond	VA	23225	11/7/2001	Closed
20174457	Gilmore Ross Residence	5504 Dorchester Rd	Richmond	VA	23225	6/13/2017	Closed
20114018	Estate of William R Pully	5505 Dorchester Rd	Richmond	VA	23225	7/16/2010	Closed
20044116	Barr Amy Residence	5506 Dorchester Rd	Richmond	VA	23225	8/27/2003	Closed
20014652	Butzner Residence	5507 Dorchester Rd	Richmond	VA	23225	3/5/2001	Closed
20124326	Middleton Ann M Residence	5508 Riverside Dr	Richmond	VA	22225	11/11/2011	Closed
20164526	Wesley LLC Property	5518 Riverside Dr	Richmond	VA	23225	5/23/2016	Closed
20114033	Langston Melanie Residence	5561 Riverside Dr	Richmond	VA	23225	7/27/2010	Closed
20054243	Taylor Frances Residence	5570 New Kent Rd	Richmond	VA	23225	9/23/2004	Closed
20034125	Brown Brian Residence	5571 Riverside Dr	Richmond	VA	23225	9/26/2002	Closed
20054397	Paul Jones Estate Property	5614 Campbell Ave	Richmond	VA	23231	1/12/2005	Closed
19941213	Barker Construction Co Inc	5616 Greendale Rd	Richmond	VA	23228	12/8/1993	Closed
20004199	Catlett Johnson Corporation	5711 Greendale Rd	Richmond	VA	23228	10/8/1999	Closed
19890108	Winns Hauling Inc	5801 School Ave	Richmond	VA	23228	7/28/1988	Closed
19910197	Winns Hauling Inc	5801 School Ave	Richmond	VA	23228	6/30/1992	Closed
20134214	5805 School Avenue LLC	5805 School Ave	Richmond	VA	23228	8/17/2012	Closed
20144061	Air Liquide	5901 Jefferson Davis Hwy	Richmond	VA	23234	7/23/2013	Closed
20024119	Dalton Richard Estate	601 Arizona Dr	Richmond	VA	23224	10/18/2001	Closed
20004282	Putney Residence	601 S Nansemond St	Richmond	VA	23221	11/24/1999	Closed
20024032	Watson Wyatt Property	605 Arizona Ave	Richmond	VA	23224	7/20/2001	Closed
20084496	Collins Priscilla Residence	617 Arizona Dr	Richmond	VA	23224	2/21/2008	Closed
20084321	Randolph Carolyn B Residence	623 Arizona Dr	Richmond	VA	23224	11/26/2007	Closed
19940380	Chevron 4036109	700 Goodes St	Richmond	VA	23224	9/1/1993	Closed
19940567	Chevron 4036109	700 Goodes St	Richmond	VA	23224	9/1/1993	Closed
19930192	Chevron Bulk Storage Facility	700 Goodes St	Richmond	VA	23224	7/27/1992	Closed
20134232	Watson William Property	706 Arizona Pl	Richmond	VA	23224	11/26/2012	Closed
20054462	Wilson Jamie L Property	706 S Nansemond St	Richmond	VA	23221	2/10/2005	Closed
20054476	Miller Reginald Residence	707 Boroughbridge Rd	Richmond	VA	23225	2/17/2005	Closed
19910526	Halifax Paper Board Co	711 Hospital St	Richmond	VA	23219	10/8/1990	Closed
19911191	Halifax Paper Board Co	711 Hospital St	Richmond	VA	23219	2/15/1991	Closed
20104289	Harrison Clarence E Residence	713 Arizona Pl	Richmond	VA	23234	12/11/2009	Closed
20114014	Whiting William Residence	718 Arizona Pl	Richmond	VA	23224	7/15/2010	Closed
19890841	Shell Fuel Distribution Terminal	8102 Shell Rd	Richmond	VA	23234	7/11/1988	Closed
20074469	Johnson Garnett Property	813 Boroughbridge Rd	Richmond	VA	23225	2/8/2007	Closed
19974058	Apache Chemical	8150 Shell Rd	Richmond	VA	23237	8/29/1996	Closed

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19974048	Apache Chemical	8150 Shell Rd	Richmond	VA	23237	8/29/1996	Closed
19901591	Southern States Tri County	8259 Hermitage Rd	Richmond	VA	23228	5/14/1990	Closed
19921017	Wilton Properties	8430 Sanford Dr	Richmond	VA	23228	10/24/1991	Closed
20124239	Diesel Power of Virginia	8620 Broadway Ave	Richmond	VA	23228	10/29/2011	Closed
20074094	Axtell Street Property	900 Oak St	Richmond	VA	23220	8/15/2006	Closed
20034075	Williams Crane and Rigging Incorporated	938 E 4th St	Richmond	VA	23224	8/20/2002	Open
20024185	Bills Quality Auto Care	9411 Old Staples Mill Rd	Richmond	VA	23228	12/12/2001	Closed
19931892	Airco Welding Products	Bickerstaff Rd	Richmond	VA	23231	3/31/1993	Closed
19921510	CSX Transportation	Brown and 17th St	Richmond	VA	23219	6/30/1992	Closed
19921519	CSX Transportation	Brown and 17th St	Richmond	VA	23219	3/3/1992	Closed
19994151	Chippenham 855 Project	Chippenham Pkwy	Richmond	VA	23234	11/9/1998	Closed
19931907	Tarmac Richmond Block Plant	Ellen and Rosedale Ave	Richmond	VA	23230	3/31/1993	Closed
19911217	RF and P Railroad	I64 and Route 33	Richmond	VA	23230	2/22/1991	Closed
20154424	Lewis Street and Nicholson Street	Lewis St and Nicholson St	Richmond	VA	23231	3/16/2015	Closed
19943868	VDOT Ditch Marathon Oil	Marathon Oil Lebanon Chemical	Richmond	VA	23219	5/12/1994	Closed
19901167	Express	Mayo Is	Richmond	VA	23219	3/8/1990	Closed
19900103	Windsor Fields	Portland Pl and Douglasdale Rd	Richmond	VA	23221	7/21/1989	Closed
19869997	Armada Trucking Company	1350 Loisdale Rd	Springfield	VA	22150	5/15/1986	Closed
19901321	Dry Plunge	6584 Fleet Dr	Springfield	VA	22310	4/4/1990	Closed
20133188	East Coast Pro Landscaping Incorporated	7809 Loisdale Rd Lot B	Springfield	VA	22150	5/9/2013	Closed
19921833	Schaeffer Industrial Park	7817 Loisdale Rd	Springfield	VA	22150	3/23/1992	Closed
20143090	Schaeffer Industrial Park	7817 Loisdale Rd	Springfield	VA	22150	11/16/2013	Closed
19830163	Maddox, Michael Residence	1108 Linden St	Woodbridge	VA	22191	8/27/1982	Closed
19890760	The Wrench Group (former Bethlehem Rebar)	1250 Featherstone Rd	Woodbridge	VA	22191	1/9/1989	Closed
19963099	Star 230641303	13254 Jefferson Davis Hwy	Woodbridge	VA	22191	8/2/1994	Closed
19943516	Exxon 23886	13324 Jefferson Davis Hwy	Woodbridge	VA	22191	4/19/1994	Closed
19921776	Amoco 60015	13400 Jefferson Davis Hwy	Woodbridge	VA	22191	12/20/1990	Closed
19860179	Amoco 1655	13404 Jefferson Davis Hwy	Woodbridge	VA	22191	8/30/1985	Closed
19983641	Station Plaza Shopping Center	13450 Jefferson Davis Hwy	Woodbridge	VA	22191	1/6/1998	Closed
19891223	Chevron 135468	13452 Jefferson Davis Hwy	Woodbridge	VA	22191	4/4/1989	Closed
19954078	Exxon 24209	13452 Jefferson Davis Hwy	Woodbridge	VA	22191	10/6/1994	Closed
19942943	Cowles Ford	13494 Jefferson Davis Hwy	Woodbridge	VA	22191	3/18/1994	Closed
19900188	Exxon 23903	13601 Jefferson Davis Hwy	Woodbridge	VA	22191	8/11/1989	Closed
19901828	Exxon 23903	13601 Jefferson Davis Hwy	Woodbridge	VA	22191	6/22/1990	Closed
20143037	MJM Auto	13608 Jefferson Davis Hwy	Woodbridge	VA	22191	8/6/2013	Closed
19911567	RF and P Facility - Woodbridge Auto	13609 Jefferson Davis Hwy	Woodbridge	VA	22191	4/24/1991	Closed
20143038	Checked Flag and A-1 Tires	13614 Jefferson Davis Hwy	Woodbridge	VA	22191	8/6/2013	Closed
19983712	Hess 46206 former	13623 Jefferson Davis Hwy	Woodbridge	VA	22192	3/24/1998	Closed
20143039	Next Car Rental/Rainbow Auto	13701 Jefferson Davis Hwy	Woodbridge	VA	22191	8/6/2013	Closed

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20073056	Purvis Steve Residence	14708 Featherstone Rd	Woodbridge	VA	22191	12/15/2005	Closed
19860823	Modern Transportation Services	15481 Farm Creek Dr	Woodbridge	VA	22191	6/13/1986	Closed
19860589	United Fiberglass	Insulation Ave	Woodbridge	VA	22191	3/16/1986	Closed

Please note that the DEQ's Pollution Complaint (PC) cases identified should be further evaluated by the ACP project engineer or manager to establish the exact location, nature and extent of the petroleum release and the potential to impact the proposed project. Also, the project engineer or manager should contact the Tank Programs at the corresponding DEQ Regional Offices as listed below:

Northern Virginia Regional Office (703) 583-3800
Piedmont Regional Office (804) 527-5020

GENERAL COMMENTS

Applicable state laws and regulations include: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-81); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Applicable Federal laws and regulations include: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous Materials, 49 CFR Part 107.

Asbestos and/or Lead-based Paint

All structures being demolished/renovated/removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, state regulations 9VAC 20-81-620 for ACM and 9VAC 20-60-261 for LBP must be followed. Questions may be directed to the following person at the locations listed below:

Northern Virginia Regional Office, Kathryn Perszyk (703) 583-3856
Piedmont Regional Office, Jason Miller (804) 527-5028

Pollution Prevention – Reuse - Recycling

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation or discovery of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Katy Dacey at (804) 698-4274.

VIRGINIA DEQ (continued)

(For response to comment 93, refer to page B-102)

94. Further evaluation of hazardous sites/facilities, including Pollution Complaint cases, that could potentially affect the Project, will be completed in a Phase I Environmental Site Assessment (ESA) prior to property acquisition, if required. At that time, Phase I ESA investigators will contact the Tank Programs at the DEQ Regional Offices to gather information on sites of concern.
95. As noted in Section 3.5.1 of the Draft EIS, the federal government and the Commonwealth of Virginia regulate hazardous materials under multiple statutes. Project construction and operation will comply with the requirements of all applicable federal and state laws and regulations for hazardous materials.
96. This requirement is contained within Section 5 ("Solid and Hazardous Wastes and Hazardous Materials") of DEQ's main letter. Refer to DRPT-numbered statement #21.
97. This statement is contained within Section 15 ("Pollution Prevention") of DEQ's main letter. Refer to DRPT-numbered statement #61.

VIRGINIA DEQ (continued)

98. This content is addressed within Section 3 (“Erosion and Sediment Control and Stormwater Management”) of DEQ’s main letter. Refer to DRPT-numbered statements #8 through #12.
99. This content is addressed within Section 1 (“Water Quality and Wetlands”) of DEQ’s main letter. Refer to DRPT-numbered statements #2 through #4.

**MEMORANDUM
DEPARTMENT OF ENVIRONMENTAL QUALITY
Piedmont Regional Office**

4949-A Cox Road Glen Allen, VA 23060 804/527-5020

TO: Janine Howard
Environmental Program Planner

FROM: Kelley West
Environmental Planner

DATE: October 10, 2017

SUBJECT: DC to Richmond Southeast High Speed Rail (17-134F).

I have reviewed the Draft EIS for the above referenced project by which the Federal Railroad Administration (FRA) and the Virginia Department of Rail and Public Transportation (DRPT) propose to install rail infrastructure and improvements from the Washington DC to Richmond Corridor that will include an additional main line high speed rail and track crossovers (DC2RVA) to connect into a larger southeast high speed rail (SEHSR) corridor. The portion of the rail this review covers for the PRO office includes a small section of the Central Virginia (area 4), Ashland (area 5) and Richmond (area 6). Multiple alternatives were presented for each of these areas, DEQ-PRO recommends the FRA and DRPT choose an alternative that causes the least amount of impacts to the natural environment. My comments are as follows:

Water- Erosion and Sediment Control and Storm Water Management: DEQ has regulatory authority for the Virginia Pollutant Discharge Elimination System (VPDES) programs related to municipal separate storm sewer systems (MS4s) and construction activities. Erosion and sediment control measures are addressed in local ordinances and State regulations. Additional information is available at <http://www.deq.virginia.gov/Programs/Water/StormwaterManagement.aspx>. Non-point source pollution resulting from this project should be minimized by using effective erosion and sediment control practices and structures. Consideration should also be given to using permeable paving for parking areas and walkways where appropriate and denuded areas should be promptly revegetated following construction work. If the total land disturbance exceeds 10,000 square feet, an erosion and sediment control plan will be required. Some localities also require an E&S plan for disturbances less than 10,000 square feet. A stormwater management plan may also be required. For any land disturbing activities equal to one acre or more, you are required to apply for coverage under the VPDES General Permit for Discharges of Storm Water from Construction Activities. The Virginia Stormwater Management Permit Authority may be DEQ or the locality. Specific questions regarding the Stormwater Management Program requirements should be directed to John McCutcheon at DEQ-PRO 804-527-5117.

Water-Wetlands: The project discusses many impacts to wetlands and streams. A Virginia Water Protection (VWP) permit may be required. DEQ-PRO recommends that all construction activities avoid wetlands to the maximum extent possible. For any questions or additional information concerning VWP Permit requirements, please contact Allison Dunaway at (804) 527-5086.

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Air: DEQ-PRO recommends the proposed actions shall operate in a manner consistent with air pollution control practices for minimizing emissions, especially during periods of high ozone. Fugitive dust should be kept to a minimum, (9 VAC5-50-60). For further questions concerning air quality issues, please contact James Kyle at (804) 527-5047.

Waste: The draft EIS discussed several contaminated sites in the proposed project areas. The generation or recovery of any hazardous waste materials should be tested and removed in accordance with the Virginia Hazardous Waste Management Regulations (9 VAC 20-60) and/or the Virginia Solid Waste Management Regulations (9 VAC 20-81). Please understand that it is the generator's responsibility to determine if a solid waste meets the criteria of a hazardous waste and as a result be managed as such. In addition, asbestos waste, lead waste, or contaminated residues generated must be handled and disposed of in accordance with the VSWMR or VHWMR as applicable. DEQ recommends that pollution prevention principles be implemented to reduce the amount of wastes at the source, such as the re-use and recycling of construction waste materials. If you have any questions concerning hazardous/solid waste management, please contact Jason Miller at (804)527-5028.

Above/Underground Storage Tanks (AST/UST): Due to the historical uses of the proposed alternatives, all necessary precautions should be taken to avoid or minimize potential environmental/health risks. Please report the installation, relocation or removal of any above or below ground petroleum storage tank to DEQ Piedmont Regional Office. For any petroleum contaminated soil/groundwater that are encountered during the sub-surface phases of this project, please contact your Local Fire Marshall with any personal safety concerns and report any such contamination to DEQ-PRO. The disposal of contaminated soils and groundwater should be done in accordance with DEQ regulatory guidelines. If you have any further questions or concerns or need to report the installation, relocation or removal of a tank please contact the DEQ-PRO at (804) 527-5020.

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VIRGINIA DEQ (continued)


100. This content is addressed within Section 4 ("Air Pollution Control") of DEQ's main letter. Refer to DRPT-numbered statements #13 through #18.
101. This content is addressed within Section 5 ("Solid and Hazardous Wastes and Hazardous Materials") of DEQ's main letter. Refer to DRPT-numbered statements #19 through #24.
102. This content is addressed within Section 5 ("Solid and Hazardous Wastes and Hazardous Materials") of DEQ's main letter. Refer to DRPT-numbered statements #19 through #24.

VIRGINIA DEQ (continued)

103. This topic is covered in Section 7 (“Recreational Resources, Scenic Rivers and Byways”) in DEQ’s main letter. Refer to DRPT-numbered statement #32.
104. Viewsheds from the Potomac Heritage National Scenic Trail have been clarified as sensitive visual resources, where applicable; refer to the errata table for the Draft EIS, which is Appendix A of the Final EIS.
105. The requested clarifications have been addressed in the errata table for the Draft EIS, which is Appendix A to the Final EIS.
106. This topic is covered in Section 7 (“Recreational Resources, Scenic Rivers and Byways”) in DEQ’s main letter. Refer to DRPT-numbered statement #33.

Molly Joseph Ward
Secretary of Natural Resources

Clyde E. Cristman
Director



Rochelle Altholz
Deputy Director of
Administration and Finance

David C. Dowling
Deputy Director of
Soil and Water Conservation
and Dam Safety

Thomas L. Smith
Deputy Director of Operations

COMMONWEALTH of VIRGINIA

DEPARTMENT OF CONSERVATION AND RECREATION

MEMORANDUM

DATE: October 11, 2017

TO: Janine Howard, DEQ

FROM: Roberta Rhur, Environmental Impact Review Coordinator

SUBJECT: DEQ 17-134F, DC to Richmond Southeast High Speed Rail

Division of Planning and Recreation Resources

The Department of Conservation and Recreation (DCR), Division of Planning and Recreation Resources (PRR), develops the *Virginia Outdoors Plan* and coordinates a broad range of recreational and environmental programs throughout Virginia. These include the Virginia Scenic Rivers program; Trails, Greenways, and Blueways; Virginia State Park Master Planning and State Park Design and Construction.

02-26 Purpose and Need The “Purpose and Need” should recognize the inter-connected and multi-modal character of transportation in the 21st century and, in the Tier II DEIS, recognize ways in which rail stations associated with a potential high speed rail line would serve as trailheads for domestic and international travelers and as gateways to outdoor recreational experiences, including local and long-distance bicycling, hiking and paddling. While recognizing some impacts to parks and trails, the document fails to describe adequately mitigation opportunities, including a continuous, associated non-motorized trail network between, at minimum, Leesylvania State Park and Falmouth and the need for crossings that meet ADA guidelines.

Section 3.9.2 Aesthetics and Visual Environment,
Consider adding the Potomac Heritage National Scenic Trail (PHNST) viewshed to the “Sensitive Resources” sidebar under the VAUs

Table 3.14-3 (page 3-176): Add PHNST to “Features” cell for Veterans Memorial Park, Leesylvania, and Cockpit Point (and any other relevant local/state jurisdiction parks), as a feature of the parks that may be impacted.

Section 4.15.2.2 (page 4-199) – Effects on Bicycle and Pedestrian Connectivity: This section states that “Opportunities for additional bicycle and pedestrian accessibility improvements, including updates to ADA facilities, would be incorporated during final design in coordination with FRA after the Draft EIS.” Since there have been a number of bike/ped accidents and fatalities along the East Coast Greenway, please consider how this project can help address bike-ped safety—particularly in the Northern Virginia and George Washington regions. This project can help address major waterway barriers that preclude the development of safe passage for bicyclists and pedestrians through this heavily travelled region.

600 East Main Street, 24th Floor | Richmond, Virginia 23219 | 804-786-6124

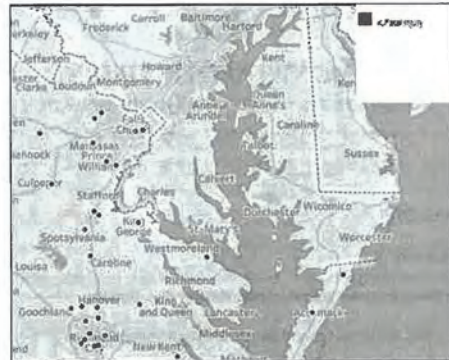
State Parks • Soil and Water Conservation • Outdoor Recreation Planning
Natural Heritage • Dam Safety and Floodplain Management • Land Conservation

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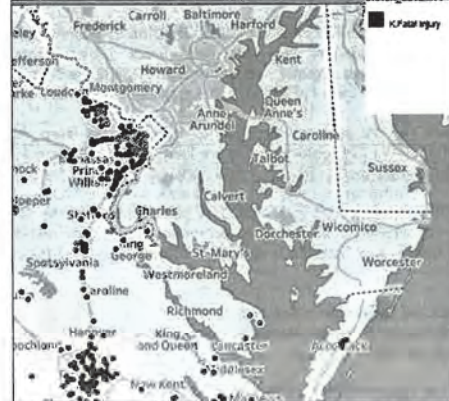
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Bicyclist fatalities 2011-2017 (Tableau Crash Analysis Tool)



Pedestrian fatalities 2011-2017 (Tableau Crash Analysis Tool)

03-182 Affected Environment The label "Potomac Heritage Trail" in the table should read "Potomac Heritage National Scenic Trail."

A model for examining the public health impact of this project is the Health Impact Assessment completed for the California High Speed Rail-San Jose to Merced Corridor, which considered the following health determinants:

VIRGINIA DEQ (continued)

(Response to comment 106 on previous page)

107. The requested modifications were addressed in the Final EIS. The requested clarification has been addressed in the errata table for the Draft EIS, which is Appendix A to the Final EIS.
108. An updated discussion of public health and safety is provided in Final EIS Section 5.18. A shared-use path within the Project right-of-way is beyond the Purpose and Need of the DC2RVA Project. The DC2RVA Project will address bike/pedestrian safety at public at-grade crossings along the DC2RVA rail corridor, in keeping with the Project's Basis of Design and applicable FRA, Amtrak, CSXT, and VDOT safety standards.

VIRGINIA DEQ (continued)

(Response to comment 108 on previous page)

109. This topic is covered in Section 7 ("Recreational Resources, Scenic Rivers and Byways") in DEQ's main letter. Refer to DRPT-numbered statement #34 and #37.
110. Section 4.2 of the Scoping Report explains that 1,220 of the 1,614 public scoping letters received were form letters, one form letter from Virginians for High Speed Rail, and another from the East Coast Greenway Alliance. These letters were summarized in the scoping report, and a full response was provided for each one. The information from the scoping report has been clarified in the Final EIS; refer to the errata table for the Draft EIS, which is Appendix A to the Final EIS.

TABLE 3.2 HEALTH DETERMINANTS CONSIDERED

Transportation	Land Use	Demographics	Economic	Ecological	Political
VTMT	Farmland	Gentrification	Poverty	Wildlife	Local buy-in
Traffic delays, Congestion	City revitalization	Spatial mismatch	Ridership	Sustainable E source	Community Input
Accidents, Injury	Aesthetics	Social cohesion	Alternate modes	Wildlife corridors	Model for other states
Noise	Walkability	Segregation	Income gain	Parks & Rec	Vulnerable sub-groups
Pollution	Open space		Tax Revenue		Alignment
Existing infrastructure	Watershed quality		Job access & creation		Shifts in political rep.
Access to health care			Property values		Safety net serv. at-risk
Parking Lots			Retail access		
Freight trucks			Competition		
Air Quality			Cost effective		

At a minimum, we recommend that this project consider the health impact of not providing a safe corridor for bicyclists and pedestrians through this heavily congested, dangerous area by providing a shared-use path alongside the rail corridor.

Portions or perhaps all of Leesylvania State Park is protected in perpetuity by section 6(f) (3) of the Land and Water Conservation Fund Act. Section 6 (f) (3) of the Land & Water Conservation Fund Act states that: "No property acquired or developed with assistance under this section shall without approval of the Secretary [of the Interior] be converted to other than public outdoor recreation uses". The LWCF program realizes that in certain instances there is no alternative to converting a portion of a LWCF property. In those extreme cases where there is no feasible alternative, a conversion of use process must be initiated with DCR for approval from the National Park Service. In short, the conversion of use process requires that a suitable piece of replacement property be found before a conversion occurs at a LWCF protected site. "Suitable" means equivalent in fair market value and can serve as a viable public outdoor recreation area without reliance upon adjoining or additional areas. Conversion of use processes must be initiated with DCR by the governmental body that owns the property. We recommend you coordinate with Synthia Waymack at synthia.waymack@dcr.virginia.gov to fully understand the requirements of conversation under this program.

Table 6.1-3: Scoping Comments These comments do not reflect The DC to Richmond Scoping Summary Report for the Southeast High Speed Rail, which acknowledged receiving 792 letters requesting that a parallel greenway be included in the Tier II EIS Study.

Richmond Quad

This project is within a portion of the James River that has been designated as a scenic river. Due to this designation, if there is any change to the existing tracks that cross the James, we recommend you contact Lynn Crump of the DCR-Division of Planning and Recreation at 804-786-5054 or Lynn.Crump@dcv.virginia.gov.

Division of Natural Heritage

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

Alexandria Quad

Biotics historically documents the presence of natural heritage resources within two miles of the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

Quantico, Guinea, Occoquan, Bowling Green, Ashland, Glen Allen, Ruther Glen, and Yellow Tavern Quads

Biotics documents the presence of natural heritage resources within two miles of the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

Annandale Quad

According to information currently in our files, the Rusty patched bumble bee (*Bombus affinis*, G1/S1/LE/NL) has been historically documented within two miles of the project area. The Rusty patched bumble bee is listed as endangered under the Endangered Species Act by U.S. Fish and Wildlife Service (USFWS) effective March 21, 2017. Since the late 1990s, the Rusty patched bumble bee has declined throughout its historical range including Virginia and is anticipated to be extinct in all ecoregions by 2030. Threats to the Rusty patched bumble bee include disease, pesticides, climate change, habitat loss and small population dynamics.

DCR recommends the implementation of the following USFWS voluntary measures for the conservation of the Rusty patched bumble bee: avoid pesticide use, avoid herbicide use, and plant native flowers that bloom throughout the spring and summer to support pollinator habitat.

Fort Belvoir Quad

According to the information currently in our files, the Marumsc Conservation Site is located downstream of the project site. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Conservation sites are polygons built around one or more rare plant, animal, or natural community designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-5, 1 being most significant. Marumsc Conservation Site has been given a biodiversity

VIRGINIA DEQ (continued)

111. Comment noted. The Preferred Alternative as analyzed in the Final EIS is based on construction of substructure/foundation for a new two-track rail bridge on the S-Line across the James River, parallel and adjacent to the existing CSXT James River Bridge connecting to Main Street Station, on the downstream (eastern) side; however, the Project will only construct a single-track bridge with space to add a second track, if required for future capacity. DRPT will continue to coordinate with DCR during final design, after funding becomes available and incremental improvements are scheduled.
112. and 113. Table 5.10-2 of the Final EIS documents the estimated acreage of permanent and temporary impacts of the Preferred Alternative to Priority Conservation Areas, which include VDCR-DNH-Natural Heritage Plan Conservation Sites and Stream Conservation Units, and sites identified in the Priority Wildlife Conservation Areas dataset.
114. The species list for the analyses conducted for the Draft EIS was provided by the USFWS on October 19, 2015, prior to listing of the Rusty patched bumble bee (*Bombus affinis*). The Final EIS (Section 5.10.3) has been updated to include a discussion of the Rusty patched bumble bee.
115. This recommendation is provided within Section 6 ("Natural Heritage Resources") of DEQ's main letter. Refer to DRPT-numbered statement #26.

VIRGINIA DEQ (continued)

116. DRPT appreciates the information provided by DCR concerning the Marumsco Conservation Site and the fine-lined emerald (*Somatochlora filosa*). As noted in Section 5.10.2.3 of the Final EIS, DRPT anticipates that the proposed Project will not adversely affect downstream aquatic species with implementation of Best Management Practices, including use of silt curtains and limiting overflow from dredging equipment, and other erosion and sediment control measures. DRPT will continue to work with VDGIF, NMFS, and USFWS to develop specific measures for avoidance, minimization, and mitigation of impacts to aquatic wildlife during final design, after funding becomes available and incremental improvements are scheduled.
117. Information regarding Crow's Nest Natural Area Preserve and its sensitive habitats is presented in Section 3.10.1.2 of the Draft EIS. As noted in Section 5.10.1.1 of the Final EIS, the Preferred Alternative will avoid direct impacts to existing state and county wildlife conservation areas, except for the Mattaponi Wildlife Management Area. Potential indirect impacts to downstream aquatic habitats are addressed in Section 5.20.1.6 of the Final EIS. As noted in Section 5.20.1.7 of the Final EIS, indirect impacts of the Project can be minimized with implementation of temporary and permanent stormwater management features and erosion and sediment controls. BMPs for avoidance of introducing new invasive species and preventing the spread of existing populations will also help minimize impacts to downstream aquatic habitats.

significance ranking of B5, which represents a site of moderate significance. The natural heritage resource of concern at this site is:

Somatochlora filosa, Fine-lined emerald G5/S2/NL/NL

The Fine-lined emerald is a state rare dragonfly species measuring 54-66 mm in length (Needham and Westfall, 1975). This colorful, slender species inhabits slow-flowing blackwater with sand, mud or silt substrate and emergent vegetation along the banks (NatureServe, 2009). The Fine-lined emerald ranges throughout the southeastern United States (Dunkle, 2000) and from several sites throughout the piedmont and coastal plain of Virginia.

Adult Odonata (dragonflies and damselflies), commonly seen flitting and hovering along the shores of most freshwater habitats, are accomplished predators. They lay their eggs on emergent vegetation or debris at the water's edge. Unlike the adults, the larvae are aquatic where they typically inhabit the sand and gravel of the substrates. Wingless and possessing gills, they crawl about the submerged leaf litter and debris stalking their insect prey. The larvae seize unsuspecting prey with a long, hinged "grasper" that folds neatly under their chin. When larval development is complete, the aquatic larvae crawl from the water to the bank, climb up the stalk of the shoreline vegetation, and the winged adult emerges (Hoffman 1991; Thorpe and Covich 1991).

Because of their aquatic lifestyle and limited mobility, the larvae are particularly vulnerable to shoreline disturbances that cause the loss of shoreline vegetation and siltation. They are also sensitive to alterations that result in poor water quality, aquatic substrate changes, and thermal fluctuations.

Stafford Quad

According to the information currently in our files, the Crow's Nest Conservation Site is located within two miles of the project site. Crow's Nest Conservation Site has been given a biodiversity significance ranking of B2, which represents a site of very high significance. The natural heritage resource of concern at this site is:

Tidal Freshwater Marsh (Mixed High Marsh Type) G3/S4?/NL/NL

Tidal Freshwater Marsh (Mixed High Marsh Type) (*Impatiens capensis-Peltandra virginica-Polygonum arifolium-Schoenoplectus fluviatilis-Typha angustifolia* Tidal Herbaceous Vegetation) occupies the higher elevation zone of freshwater to slightly oligohaline marshes on the Atlantic Coast from Maine to Virginia. From Delaware to northern Virginia, this is the principal mixed freshwater tidal marsh community and forms extensive patches along many tidal rivers. This community is composed of mixed, dense, and often diverse marsh vegetation with highly variable species composition and patch dominance. The soils are highly variable, varying from silts and silty mucks to peats and sands across the range (NatureServe, 2010). In Virginia, this community occurs most extensively in estuarine reaches of the Potomac River drainage, but has also been documented along the Rappahanock, Pamunkey, Mattaponi, and James Rivers.

Freshwater tidal marshes are naturally dynamic systems that are best developed where there is a major input of freshwater, daily tidal range of at least 0.5 m, and a geomorphology that tends to constrict and magnify tidal influence in the upper reaches of the estuary. These marshes are subject to diurnal flooding by tides and river discharge (NatureServe, 2010). Principal threats include chronic sea-level rise leading to increasing upstream salinity, pollutants, and invasive exotic plants such as marsh dewflower (*Murdannia keissak*) (Fleming et al. 2011).

The Crow's Nest Natural Area Preserve is located downstream from the project site. DCR recommends coordination with Mike Lott, DCR - Division of Natural Heritage Northern Region Steward at (540) 658-8690 or Michael.lott@dcv.virginia.gov for additional information about the preserve and associated natural heritage resources.

Fredericksburg Quad

According to the information currently in our files, the South Fredericksburg Conservation Site is located within two miles of the project site. The South Fredericksburg Conservation Site has been given a biodiversity significance ranking of B2, which represents a site of very high significance. The natural heritage resource of concern at this site is:

Non-Riverine Wet Hardwood Forest (Northern Coastal Plain type)

G2?/S2?/NL/NL

The Non-riverine Flatwood/Swamp occurs in the central and northern Virginia Coastal Plain on large, flat, imperfectly drained terraces and very wide, ancient floodplains that are no longer subject to alluvial processes. Its hydrology is seasonally to nearly permanently saturated, with occasional ponding or groundwater sheet flows, and is maintained by a high water table rather than riverine or estuarine flooding (NatureServe, 2011). Habitats are essentially flat, with seasonally perched water tables. Shallow, braided channels and depressions which pond water intermittently are frequent habitat features. Surface soils are silt, sand, and clay loams, usually overlying dense clay subsoils (hardpans) that impede drainage. Mature stands of this association are dominated by variable mixtures of hydrophytic oaks (*Quercus* spp.), including swamp chestnut oak (*Quercus michauxii*), cherrybark oak (*Quercus pagoda*), willow oak (*Quercus phellos*), pin oak (*Quercus palustris*), and white oak (*Quercus alba*). Cutting and other disturbances result in higher proportions of sweetgum (*Liquidambar styraciflua*), red maple (*Acer rubrum*), and other intolerant trees. Small trees and shrubs include American hornbeam (*Carpinus caroliniana* ssp. *caroliniana*), American holly (*Ilex opaca* var. *opaca*), sweet pepper-bush (*Clethra alnifolia*), sweetbay (*Magnolia virginiana*), fetterbush (*Leucothoe racemosa*), and highbush blueberries (*Vaccinium* spp.). Herb layers usually contain netted chain fern (*Woodwardia areolata*) and a variety of sedges, (e.g., *Carex abscondita*, *Carex debilis* var. *debilis*, *Carex intumescens*). Late-successional non-riverine saturated forests have been greatly reduced in extent or modified by extensive agricultural clearing, logging, conversion to pine silviculture, and hydrologic alterations such as ditching and draining. (Fleming, et al., 2011)

In addition, the Hazel Run Rt. 1 to Rt. 2 Stream Conservation Unit (SCU) is located downstream from the project site. SCUs identify stream reaches that contain aquatic natural heritage resources, including 2 miles upstream and 1 mile downstream of documented occurrences, and all tributaries within this reach. SCUs are also given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain. The Hazel Run Rt. 1 to Rt. 2 SCU has been given a biodiversity ranking of B3, which represents a site of high significance. The natural heritage resources associated with this site are:

Aquatic Natural Community (NP-Lower Rappahannock Second Order Stream)

G2?/S2?/NL/NL

Aquatic Natural Community (NC-Lower Rappahannock Second Order Stream)

G2G3/S2S3/NL/NL

The documented Aquatic Natural Communities are based on Virginia Commonwealth University's *INSTAR (Interactive Stream Assessment Resource)* database which includes over 2,000 aquatic (stream and river) collections statewide for fish and macroinvertebrate. These data represent fish and macroinvertebrate assemblages, instream habitat, and stream health assessments. The associated Aquatic Natural Communities are significant on multiple levels. First, these streams are a grade B, per the VCU-Center for Environmental Sciences (CES), indicating their relative regional significance, considering their aquatic community composition and the present-day conditions of other streams in the region. These stream reaches also hold a "Healthy" stream designation per the INSTAR Virtual Stream Assessment (VSS) score.

VIRGINIA DEQ (continued)

118. This recommendation is provided within Section 6 ("Natural Heritage Resources") of DEQ's main letter. Refer to DRPT-numbered statement #27.
119. Information regarding the South Fredericksburg Conservation Site and the Hazel Run Stream Conservation Unit (SCU), and the natural communities associated with these sites is presented in Table 3.10-2 of the Draft EIS. Table 5.10-2 of the Final EIS documents the estimated acreage of permanent and temporary impacts of the Preferred Alternative (as updated since the Draft EIS) to Priority Conservation Areas, which include VDCR-DNH-Natural Heritage Plan Conservation Sites and Stream Conservation Units, and sites identified in the Priority Wildlife Conservation Areas dataset. Outside of the CSXT right-of-way, approximately 0.04 acres of permanent impacts, and 0.35 acres of temporary impacts are anticipated at the South Fredericksburg Conservation Site under the Preferred Alternative 3B.

Refer to DRPT-numbered statement #117 regarding potential indirect impacts to downstream aquatic habitats and measures to minimize impacts.

VIRGINIA DEQ (continued)

(Response to comment 119 on previous page)

120. Information regarding the South Anna River – Falling Creek SCU is presented in Table 3.10-2 of the Draft EIS. Table 5.10-2 of the Final EIS documents the estimated acreage of permanent and temporary impacts of the Preferred Alternative to Priority Conservation Areas, which include VDCR-DNH-Natural Heritage Plan Conservation Sites and Stream Conservation Units, and sites identified in the Priority Wildlife Conservation Areas dataset. The estimated acreage of impacts to specific Natural Heritage Conservation Sites and Stream Conservation Units, are identified in Table 4-7 of Appendix M Natural Resources Technical Report of the Draft EIS. As noted there, the only impacts to the South Anna River – Falling Creek SCU are under Build Alternatives 5C and 5C – Ashcake, neither of which were selected as the Preferred Alternative. In Area 5, Alternative 5A was selected as the Preferred Alternative (refer to Section 4.3.5 of the Final EIS for details).

The state threatened green floater (*Lasmigona subviridis*) is identified in Table 3.10-8 of the Draft EIS as being among species that may occur within the vicinity of the study area. A description of this species is provided in Section 3.10.5.3 of the Draft EIS. Potential direct impacts to this species from the Preferred Alternative are identified in Table 5.10-6 of the Final EIS. Indirect impacts to aquatic habitats, which are addressed in Section 5.20.1.6 of the Final EIS, are applicable to downstream populations of green floater and other aquatic species.

This score assesses the similarity of these streams to ideal stream conditions of biology and habitat for this region. Lastly, these streams contribute to high Biological Integrity at the watershed level (6th order) based on number of native/non-native, pollution-tolerant/intolerant and rare, threatened or endangered fish and macroinvertebrate species present.

Threats to the significant Aquatic Natural Communities and the surrounding watershed include water quality degradation related to point and non-point pollution, water withdrawal and introduction of non-native species.

In addition, Yellow lance (*Elliptio lanceolata*, G2G3/S2S3/SOC/NL) occurs in mid-sized rivers and second and third order streams. To survive, it needs a silt-free, stable streambed and well-oxygenated water that is free of pollutants. This species has been the subject of taxonomic debate in recent years (NatureServe, 2009). Currently in Virginia, the Yellow lance is recognized from populations in the Chowan, James, York, and Rappahannock drainages. Its range also extends into Neuse-Tar river systems in North Carolina. In recent years, significant population declines have been noted across its range (NatureServe, 2009). Please note that this species is currently classified as a species of concern by the United States Fish and Wildlife Service (USFWS) however, this designation has no official legal status.

Considered good indicators of the health of aquatic ecosystems, freshwater mussels are dependent on good water quality, good physical habitat conditions, and an environment that will support populations of host fish species (Williams et al., 1993). Because mussels are sedentary organisms, they are sensitive to water quality degradation related to increased sedimentation and pollution. They are also sensitive to habitat destruction through dam construction, channelization, and dredging, and the invasion of exotic mollusk species. The Yellow lance may be particularly sensitive to chemical pollutants and exposure to fine sediments from erosion (NatureServe, 2009).

Ashland and Hanover Academy Quads:

According to the information currently in our files, the South Anna River – Falling Creek Stream Conservation Unit (SCU) is located downstream from the project site. SCUs identify stream reaches that contain aquatic natural heritage resources, including 2 miles upstream and 1 mile downstream of documented occurrences, and all tributaries within this reach. SCUs are also given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain. The South Anna River – Falling Creek SCU has been given a biodiversity ranking of B3, which represents a site of high significance. The natural heritage resources associated with this site are:

<i>Elliptio lanceolata</i>	Yellow lance	G2G3/S2S3/SOC/NL
Aquatic Natural Community (NP-Pamunkey Third Order Stream)		G2/S2/NL/NL

The documented Aquatic Natural Community is a grade B, per the VCU-Center for Environmental Sciences (CES), indicating its relative regional significance, considering its aquatic community composition and the present-day conditions of other streams in the region. This stream reach also holds a "Healthy" stream designation per the INSTAR Virtual Stream Assessment (VSS) score. Lastly, this stream contributes to high Biological Integrity at the watershed level (6th order) based on number of native/non-native, pollution-tolerant/intolerant and rare, threatened or endangered fish and macroinvertebrate species present.

Threats to the significant Aquatic Natural Community and the surrounding watershed include water quality degradation related to point and non-point pollution, water withdrawal and introduction of non-native species.

Additionally, Green floater (*Lasmigona subviridis*, G3/S2/NL/LT) has been historically documented downstream of the project site in the South Anna River.

The Green floater, a rare freshwater mussel, ranges from New York to North Carolina in the Atlantic Slope drainages, as well as the New and Kanawha River systems in Virginia and West Virginia (NatureServe, 2009). In Virginia, there are records from the New, Roanoke, Chowan, James, York, Rappahannock, and Potomac River drainages. Throughout its range, the Green floater appears to prefer the pools and eddies with gravel and sand bottoms of smaller rivers and creeks, smaller channels of large rivers (Ortman, 1919) or small to medium-sized streams (Riddick, 1973). Please note that this species has been listed as state threatened by the Virginia Department of Game and Inland Fisheries (VDGIF).

To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations, establishment/enhancement of riparian buffers with native plant species and maintaining natural stream flow.

Richmond and Drewry's Bluff Quads

According to information currently in our files, Laura's clubtail (*Stylurus laurae*, G4/S2/NL/NL), a state rare dragonfly, ranges from Ohio south to Florida with westward records to Texas (Kondratieff, 2000). In Virginia, there are records across the Piedmont and west to the Ridge and Valley region. Its habitat consists of moderated gradient streams with many shallow riffles and runs (NatureServe, 2009).

Threats include activities that alter the water flow or substrate such as: impoundments, channelization, dredging, siltation, agricultural non-point pollution, and municipal and industrial pollution. In addition, timber harvest may increase siltation and cause a decrease in dissolved oxygen as canopy cover is removed and water temperature rises (NatureServe, 2009).

Please note according to DCR's species distribution model, potential may exist for the Dwarf wedgemussel (*Alasmidonta heterodon*, G1G2/S1/LE/LE) within the project area or adjacent to the project area in the Fort Belvoir and Fredericksburg Quads. To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations, establishment/enhancement of riparian buffers with native plant species and maintaining natural stream flow. Due to the legal status of the Green floater and Dwarf wedgemussel, DCR also recommends coordination with Virginia's regulatory authority for the management and protection of these species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. Provided adherence to Virginia's erosion and sedimentation control/stormwater management laws and regulations and the limits of disturbance to be within the current right-of-way, the current activity will not affect any documented state-listed plants or insects.

New and updated information is continually added to Biotics. Please re-submit project information and map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

The Virginia Department of Game and Inland Fisheries (VDGIF) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Ernie Aschenbach at 804-367-2733 or Ernie.Aschenbach@dgif.virginia.gov. This project is located within 2 miles of a documented occurrence of a state listed animal in the Alexandria Quad. In addition, the

VIRGINIA DEQ (continued)

(Response to comment 120 on previous page)

121. This recommendation is provided within Section 6 ("Natural Heritage Resources") of DEQ's main letter. Refer to DRPT-numbered statement #28.
122. DRPT appreciates the information provided by DCR concerning the Laura's clubtail (*Stylurus laurae*). The Draft EIS analysis of potential Project effects on sensitive species focuses on federal and state listed threatened and endangered species. Potential Project effects on other wildlife species are addressed in Section 5.10.2 of the Final EIS. Other applicable impacts analyses in the Final EIS include the discussions of impacts to streams (Section 5.1.1), wetlands (Section 5.1.2) and water quality (Section 5.1.3).
123. The Dwarf Wedgemussel (*Alasmidonta heterodon*) is identified in Table 5.10-5 of the Final EIS as having the potential to be affected by the Preferred Alternative within Areas 2 through 5 (i.e. Northern Virginia through Ashland). See response to DRPT-numbered statement #28 for a discussion of erosion and sediment control, stormwater management, and other measures to minimize impacts to aquatic habitats. DRPT will coordinate with VDGIF in accordance with the Virginia Endangered Species Act during final design and Project permitting, after funding becomes available and incremental improvements are scheduled.
124. This recommendation is provided within Section 6 ("Natural Heritage Resources") of DEQ's main letter. Refer to DRPT-numbered statement #30.
125. This recommendation is provided within Section 6 ("Natural Heritage Resources") of DEQ's main letter. Refer to DRPT-numbered statement #31.

VIRGINIA DEQ (continued)

(Response to comment 125 on previous page)

126. This topic and recommendation are addressed within Section 8 ("State Parks") of DEQ's main letter. Refer to DRPT-numbered statement #39.

Rappahannock River, which has been designated by the Virginia Department of Game and Inland Fisheries (VDGIF) as a "Threatened and Endangered Species Water" for the Green floater and the South Anna River which has been designated by the Virginia Department of Game and Inland Fisheries (VDGIF) as a "Threatened and Endangered Species Water" for the Dwarf wedgemussel are within 2 miles of the project area. Therefore, DCR recommends coordination with Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

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Division of State Parks

DCR's Division of State Parks is responsible for acquiring and managing, state parks. Park development and master planning are managed by the Division of Planning and Recreation Resources. Master plans are required prior to a parks opening and are updated every ten years (Virginia Code § 10.1-200 *et seq.*).

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This project has the potential to impact Leesylvania and Widewater State Parks, therefore we recommend coordination with State Parks Division Director, Craig Seaver at Craig.Seaver@dcr.virginia.gov.

The remaining DCR divisions have no comments regarding the scope of this project. Thank you for the opportunity to comment.

Cc: Craig Seaver, DCR
Synthia Waymack, DCR
Amy Ewing, VDGIF
Troy Andersen, USFWS

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VIRGINIA DEQ (continued)

(No comments on this page)

VIRGINIA DEQ (continued)

(No comments on this page)

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Howard, Janine (DEQ)

From: Holma, Marc (DHR)
Sent: Thursday, September 14, 2017 9:18 AM
To: Howard, Janine (DEQ)
Subject: SEHSR DC2RVA Environmental Impact Report (DHR #2014-0666/DEQ #17-134F)

Janine,

Please accept this email as DHR's response to DEQ's request for our review of the EIR for the above referenced project. The Federal Railroad Authority and the Department of Rail and Public Transportation have both been working closely with DHR pursuant to Section 106 of the National Historic Preservation Act on this project. We anticipate that both agencies will continue to coordinate with use per Section 106 and would request DEQ in its response to encourage them to do so.

Sincerely,
 Marc Holma

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VIRGINIA DEQ (continued)

127. DRPT received notification from DHR under separate cover; refer to DHR's letter, which is included as part of the agency responses in the Final EIS, for comment/response.

Howard, Janine (DEQ)

From: Warren, Arlene (VDH)
Sent: Wednesday, October 11, 2017 5:09 PM
To: Howard, Janine (DEQ)
Subject: 17-134F DRAFT PROJECT Review FRA DC to Richmond Rail
Attachments: Comments from OEHS Onsite Sewage & Water Services.docx

Project Name: DC to Richmond Southeast High Speed Rail

Project #: 17-134F

UPC #: N/A

Location: Cities of Richmond and Fredericksburg, Chesterfield, Henrico, Hanover, Caroline, Spotsylvania, Stafford, Prince William, Fairfax, and Arlington Counties

VDH – Office of Drinking Water has reviewed the above project. Below are our comments as they relate to proximity to **public drinking water sources** (groundwater wells, springs and surface water intakes). Potential impacts to public water distribution systems or sanitary sewage collection systems **must be verified by the local utility.**

The following public groundwater wells are located within a 1-mile radius of the project site (wells within a 1,000-foot radius are formatted in **bold**):

PWS ID Number	City/County	System Name	Facility Name
6153765	PRINCE WILLIAM	TIM'S RIVERSHORE RESTAURANT	WELL #2 DRILLED 2011
6033362	CAROLINE	NPS - JACKSON SHRINE	DRILLED WELL
4087098	HENRICO	BUBBAS BAR AND GRILL	WELL NO. 2 (BORED)
4085129	HANOVER	CALVARY PENTECOSTAL CAMP	WELL #6
4085129	HANOVER	CALVARY PENTECOSTAL CAMP	WELL #5
4085920	HANOVER	RHAPSODY	DRILLED WELL
6033495	CAROLINE	MICHAEL D. DENT INDUSTRIAL PARK	WELL 8B
6033490	CAROLINE	MATTAPONI SPRINGS GOLF COURSE	DRILLED WELL
6033500	CAROLINE	MILFORD SANITARY DISTRICT	WELL 2
6179630	STAFFORD	POTOMAC POINT WINERY	WELL 1
6059505	FAIRFAX COUNTY	FAIRFAX YACHT CLUB	FX YACHT CLUB DRILLED WELL

The following surface water intakes are located within a 5-mile radius of the project site:

PWS ID Number	System Name	Facility Name
6059501	FAIRFAX COUNTY WATER AUTHORITY	OCCOQUAN RESERVIOR INTAKE
6179100	STAFFORD COUNTY UTILITIES	AQUIA CREEK
6153675	QUANTICO MARINE BASE-MAINSIDE	BRECKINRIDGE RE
6177300	SPOTSYLVANIA COUNTY UTILITIES	RAPPAHANNOCK RIVER INTAKE
6177300	SPOTSYLVANIA COUNTY UTILITIES	MOTTS RUN RESERVOIR - ALT INTAKE
6033425	LAKE CAROLINE	STEVENS MILL RN
4085398	HANOVER SUBURBAN WATER SYSTEM	NORTH ANNA RWI
4760100	RICHMOND, CITY OF	RAW WATER INTAKE

VIRGINIA DEQ (continued)

128. This recommendation is provided within Section 10 ("Public Water Supply") of DEQ's main letter. Refer to DRPT-numbered statement #44.
129. DRPT appreciates the list of public groundwater wells provided by VDH – Office of Drinking Water. The extent of VDH's list (11 wells within 1.0 mile of the Project site, two of which are within 1,000 feet of the rail) is comparable to the number of wells identified in Section 5.1.4 of the Final EIS (11 wells within 1.0 mile of the Project rail line, two of which are also within 1,000 feet of the Limits of Disturbance for the Preferred Alternative).
130. DRPT appreciates the list of surface water intakes within a 5-mile radius of the Project site provided by VDH – Office of Drinking Water. Three of the surface water intake systems were identified in Section 4.1.4 of the Draft EIS. DRPT has recently obtained an updated version (February 2018) of VDOT's Comprehensive Environmental Data and Reporting System, which identifies all eight of the surface water intake locations within a 5-mile radius of the Project, as identified from VDH. The additional five locations are located upstream of the Project. This information has been incorporated into Section 5.1.4 of the Final EIS.

The project is within the watershed of the following public surface water sources (facilities where the project falls within 5 miles of the intake and is within the intake's watershed are formatted in **bold**):

PWS ID Number	System Name	Facility Name
4085398	HANOVER SUBURBAN WATER SYSTEM	NORTH ANNA RWI
3700500	NEWPORT NEWS, CITY OF	CHICKAHOMINY R
3670800	VIRGINIA-AMERICAN WATER CO	APPOMATTOX RIVER

- *Radiological Health, Mr. Steven Harrison, Director – no comments were received.*
- *Comments are attached from OEHS Onsite Sewage & Water Services, Mr. Dwayne Roadcap*
- *OEHS Division of Shellfish Sanitation, Mr. Eric Aschenbach – no comments were received.*

Best Management Practices should be employed, including Erosion & Sedimentation Controls and Spill Prevention Controls & Countermeasures on the project site.

Well(s) within a 1,000-foot radius from project site should be field marked and protected from accidental damage during construction.

Materials should be managed while on site and during transport to prevent impacts to nearby surface water.

Best Regards,

Arlene Fields Warren
GIS Program Support Technician
Office of Drinking Water
Virginia Department of Health
109 Governor Street
Richmond, VA 23220
(804) 864-7781

The Virginia Department of Health – Office of Drinking Water appreciates the opportunity to provide comments. If you have any questions, please let me know.

From: Fulcher, Valerie (DEQ)

Sent: Tuesday, September 12, 2017 2:05 PM

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

VIRGINIA DEQ (continued)

131. DRPT appreciates the list of public surface water sources within the same watershed as the Project provided by VDH – Office of Drinking Water. Hanover Suburban Water System, which is identified in Section 5.1.4 of the Final EIS, is the only surface water intake within the watershed that is within 5 miles of the Project.
132. These recommendations are provided within Section 10 (“Public Water Supply”) of DEQ’s main letter. Refer to DRPT-numbered statement #43.

VIRGINIA DEQ (continued)

133. This topic and its recommendations are addressed within Section 11 ("Septic Tanks and Drainfield Regulations") of DEQ's main letter. Refer to DRPT-numbered statements #45 through #47.

Comments on the Draft Environmental Impact Statement: Southeast High Speed Rail from Richmond to Washington, D.C.

Local health districts can provide available electronic information regarding the location of private wells and sewage systems near the proposed project area. OEHS recommends that the consultant contact each local health department in the project area, to the extent possible, to obtain appropriate records and ensure the project will not negatively impact private wells and onsite sewage systems. VDH does not have an accurate estimate of the number of private wells or septic systems in the project area.

From the 250-acre Acca Yard in Henrico County (CSX's major transfer point in Virginia) to Parham Road and points North, the project is mostly near areas served by public water and sewer; however, older wells or septic systems might still be in use or present (and not used). From Parham Road North to the Chickahominy River crossing into Hanover County, and parallel to Old Washington Highway, the project is near areas primarily served by private wells and septic systems (e.g., Classic Catering and Hunton Park). The projected rail line covers about 22 linear miles through Chesterfield County and the south side of the James River in the City of Richmond. For construction within the City of Richmond, staff notes there are several churches and schools within or near the project area. Staff recommends that information be shared with the local communities and that appropriate points of contact be shared. If water, sewer, electricity, or other utility service might be impacted, then the local community should be informed in advance with accommodations provided as necessary. In the Hanover County project area, staff estimates that a few hundred wells and onsite sewage systems will be near the project area. Property owners must submit an application to the local health department to relocate any onsite sewage system impacted by the construction.

Dwayne Roadcap
Director, Division of Onsite Sewage,
Water Supplies, Environmental Engineering,
and Marina Programs
Virginia Department of Health
109 Governor Street, 5th Floor
Richmond, Virginia 23219
Office: (804) 864-7458
Cell: (804) 221-7335
Fax: (804) 864-7475

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October 30, 2017

VIA EMAIL

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

RE: DEQ #17-134F (Draft EIS)
D.C. to Richmond Southeast High-Speed Rail Project (DC2RVA)

Dear Ms. Howard:

The Virginia Outdoors Foundation (VOF) is in receipt of your email dated October 23, 2017, concerning the above-referenced project. VOF, an agency of the Commonwealth, was established by the General Assembly in 1966 to promote the preservation of Virginia's natural and cultural resources by encouraging private philanthropy in fulfillment of state policy. As a result of Virginia's commitment to ensure a vibrant natural environment for today and future generations, VOF owns thousands of acres managed for public access and holds more than 4,000 easements across the Commonwealth, and these easements protect in perpetuity over 800,000 acres of open-space.

We thank you for the opportunity to provide comments regarding the proposed passenger rail upgrades to the 123-mile CSXT railroad corridor between Long Bridge (Arlington County) and Centralia, Virginia (Chesterfield County). This project is located in a region that does not contain a high concentration of our open-space easements, due to the urbanized nature of the long-existing rail corridor, US Route 1, and Interstate 95 between Washington, D.C. and Richmond, Virginia.

Along the existing and preferred alignments, as outlined in the Tier II Draft Environmental Impact Statement (EIS) Appendix E, Build Alternatives Area 3—Fredericksburg, VOF does not hold any open-space easements within 1.5 miles of the railroad corridor. Furthermore, VOF is not currently working on any new open-space easement proposals within 1.5 miles of the railroad corridor. However, Alternative 3-C would cross 2 open-space easements in Caroline County and come within 1.5 miles of 2 additional open-space easements in Spotsylvania County. VOF supports the preferred Alternative 3-B as an avoidance to impacting existing easements.

In considering the potential impact that Alternative 3-C might have on conservation lands, an open-space easement is a legal interest in real property that creates a relationship between the holders of the easement and the property owner. By means of the easement, VOF has an interest in specific conservation values of the property and a legal obligation to protect these values.

— virginiaoutdoorsfoundation.org —

600 East Main Street, Suite 402 | Richmond, VA 23219 | (434) 906-0879

Page 1 of 2

VIRGINIA DEQ (continued)

134. This topic and its recommendations are addressed within Section 12 ("Open Space") of DEQ's main letter. Refer to DRPT-numbered statements #48 and #49.

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VIRGINIA DEQ (continued)

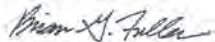
(Response to comment 134 on previous page)

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VOF easements provide important public benefits by protecting in perpetuity significant tracts of mostly undeveloped land which may contribute to the protection of water quality, productive soils, natural heritage resources, historic resources, and scenic viewsheds. VOF easements represent over \$1 billion of public investment and fulfillment of Title XI of the Virginia Constitution and other public policies to ensure conservation of natural and cultural resources. These investments in conservation and future conservation opportunities may be jeopardized if a new high-speed railroad corridor impairs the protected resources and their character-defining setting. Degradation of protected resources may result in a loss of confidence in the effectiveness of conservation easements by the public.

Thank you for the notice and we look forward to working with you, the Virginia Department of Rail and Public Transportation, and the Federal Railroad Administration as necessary in the continued planning of this project. If you have any further questions, please feel free to contact me at (434) 906-0879 or via e-mail at bfuller@vofonline.org. You may also contact Martha Little, Director of Stewardship at (804) 577-3337 or via email at mittle@vofonline.org.

Sincerely,



Brian G. Fuller
Assistant Director of Stewardship

CC: Valerie Fletcher, Environmental Program Specialist, DEQ (via email)
Martha Little, Director of Stewardship, VOF (via email)
Mike Hallock-Solomon, GIS/IT Specialist, VOF (via email)

virginiaoutdoorsfoundation.org

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Page 2 of 2



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Mailing address: P.O. Box 1105, Richmond, Virginia 23218

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Molly Joseph Ward
Secretary of Natural ResourcesDavid K. Paylor
Director(804) 698-4020
1-800-592-5482

MEMORANDUM

TO: Janine Howard, DEQ EIR Coordinator

FROM: Daniel Moore, Principal Environmental Planner

DATE: September 13, 2017

SUBJECT: DEQ # 17-134F: FRA: DC to Richmond Southeast High Speed Rail, Cities of Richmond and Fredericksburg, Chesterfield, Henrico, Hanover, Caroline, Spotsylvania, Stafford, Prince William, Fairfax and Arlington Counties

We have reviewed the Draft Environmental Impact Statement (EIS) for the proposed project and offer the following comments regarding consistency with the provisions of the *Chesapeake Bay Preservation Area Designation and Management Regulations* (Regulations):

In the Cities of Richmond and Fredericksburg and the Counties of Chesterfield, Henrico, Hanover, Caroline, Spotsylvania, Stafford, Prince William, Fairfax and Arlington, the areas protected by the *Chesapeake Bay Preservation Act*, as locally implemented, require conformance with performance criteria. These areas include Resource Protection Areas (RPAs) and Resource Management Areas (RMAs) as designated by the local government. RPAs include tidal wetlands, certain non-tidal wetlands and tidal shores, and a minimum 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow. Areas within the RMA are subject to the general performance criteria as specified in § 9VAC 25-830-130 of the Regulations and the local ordinance. Projects within the RMA must minimize land disturbance (including access and staging areas), retain existing vegetation and minimize impervious cover.

The project involves improvements to a 123 mile section of existing CRX railway, generally parallel to the I-95 corridor from Long Bridge in Arlington County to Centralia in Chesterfield County to increase rail capacity and rail speed between Washington DC and Richmond. Construction, installation, and operation and maintenance of railroads and their appurtenant structures are conditionally exempt from the Regulations provided they are constructed in accordance with:

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VIRGINIA DEQ (continued)

135. This topic and its recommendations are addressed within Section 13 ("Chesapeake Bay Preservation Areas") of DEQ's main letter. Refer to DRPT-numbered statements #50 and #51.

VIRGINIA DEQ (continued)

(Response to comment 135 on previous page)

1. regulations promulgated pursuant to the *Erosion and Sediment Control Law*, § 10.1-603 et seq. of the Code of Virginia, and the *Stormwater Management Act*, § 10.1-603.1 et seq. of the Code of Virginia;
2. an erosion and sediment control plan and a stormwater management plan approved by the Virginia Department of Conservation and Recreation; or,
3. local water quality protection criteria at least as stringent as the above state requirements.

Provided adherence to the above requirements, the proposed activity would be consistent with the *Chesapeake Bay Preservation Act* and the Regulations.

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County of Fairfax, Virginia

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

October 20, 2017

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

Re: Project Number: DEQ #17-134F

Dear Ms. Howard:

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

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

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

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

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www.fairfaxcounty.gov/dpz/



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DEQ-Office of Environmental
Impact Review

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VIRGINIA DEQ (continued)

136. As indicated in Section 5.10.1.4 of the Final EIS, minimization and mitigation measures could include minimizing clearing and grubbing (including tree removal), development of a mitigation plan that includes landscaping and planting detail for onsite replacement of any trees removed, and native revegetation, including native shrub plantings and native reseeding of disturbed areas to prevent the spread of invasive species. Construction contract documents will include appropriate measures to protect trees along the limits of disturbance. These minimization and mitigation measures will be applicable to all vegetation communities within the limits of disturbance, not just environmentally sensitive areas.
137. Fairfax County submitted comments directly to DRPT on November 6, 2017, which included comments on Pohick Seeps; refer to Fairfax County's letter, which is included as part of the agency responses in the Final EIS, for DRPT responses to their comments.

Janine Howard
October 20, 2017
Page 2

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

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

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

Sincerely,

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

MG: EMH

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

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VIRGINIA DEQ (continued)

(Response to comment 137 on previous page)

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



FAIRFAX COUNTY PARK AUTHORITY

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

September 18, 2017

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

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

Dear Ms. Stock:

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

- The rail corridor passes the northernmost parcel of Old Colchester Park and Preserve with approximately 85 feet of Right Of Way (ROW) between the existing rail line and the park Boundary. Just 1,600 feet to the northeast is Mason Neck West Park where the ROW is reduced to 56 feet between existing rails and the park boundary at its narrowest. Therefore, staff is concerned that if the proposed rail line will impact Old Colchester Park and Preserve with an 85 foot ROW, it will certainly impact nearby Mason Neck West Park that only has a 56 foot wide ROW.
- The above listed Fairfax County Park Authority owned parks could experience direct significant impacts of lost land, recreation facilities, vegetation, and habitat, increased storm water discharge, invasive species, and wildlife habitat impacts. Therefore, we would like to review all future documents and plans at the earliest opportunity as the project progresses. If it is necessary to impact either Old Colchester Park and Preserve or Mason Neck West Park, all comments regarding right of entry permits, archaeological investigation, and mitigation provided in the January 9, 2017 letter still apply (enclosed).
- The potential impacted parcel of Old Colchester Park and Preserve is deed restricted as well as subject to both Section 4(f) and 6(f) Land and Water Conservation Fund lands. If a Section 6(f) resource is impacted, it will require court action and suitable land replacement will need to be identified, acquired, and conveyed in coordination with the park owner(s), the Virginia Department of Conservation (VDCR), and Department of the Interior (DOI).

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VIRGINIA DEQ (continued)

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

VIRGINIA DEQ (continued)

(Response to comment 139 on previous page)

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

- Requests for land rights on Park Authority owned property are necessary in order to perform any surveying, test boring, wetland flagging, utility relocation, clearing, grading, construction or other activity, even within an easement of any sort. Please advise any contractors and subcontractors of this requirement. The applicant must first acquire a Right of Entry License, Easement and / or Construction Permit from the Easement Coordinator, Fairfax County Park Authority, Planning and Development Division, 12055 Government Center Parkway, Suite 406, Fairfax, Virginia 22035. The main telephone number is (703) 324-8741. Because of restrictive covenants on some of the Park Authority properties, it may not be possible to approve easements on the park property. Conditions and/or fees may be required for Park Authority permits or easements.
- There is a high potential for impacts to numerous Native American, Historical, and Environmental resources within Old Colchester Park that should be incorporated into the scope of work. The Park Authority will require consultation with the Virginia Department of Heritage Resource (VDHR), as will any federal permitting or funding which will trigger Section 106.
- As this is a known historic site, the Park Authority will require a Phase I archaeological survey. If significant sites are found, Phase II archaeological testing is recommended in order to determine if sites are eligible for inclusion on the National Register of Historic Places. If sites are found eligible, avoidance or Phase III archaeological data recovery is recommended.
- To ensure that the project keeps moving forward with the least disturbance to parkland, the Park Authority requests to review all future plans as soon as they are available.

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

Sincerely,


Sara Baldwin, Acting Executive Director

Enclosure

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

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FAIRFAX COUNTY PARK AUTHORITY

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January 9, 2017

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

RE: DC2RVA Draft EIS Recommendations

Dear Ms. Emily Stock,

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

- The proposed project is directly adjacent to Accotink Stream Valley, Backlick Stream Valley, Mason Neck West, Old Colchester Park and Preserve, and Pohick Stream Valley Parks, as well as being within close proximity to Franconia Forest Park.
- It is unclear whether or not there will be any surveying, clearing, grading, or temporary/permanent construction, etc. on parkland. However, in order to perform any surveying, clearing, grading, or temporary/permanent construction, etc. on parkland, even in an existing easement, the Applicant must first acquire a Right of Entry License, Easement, and/or Construction Permit from the Fairfax County Park Authority. Due to restrictive covenants on some Park Authority properties, it may not be possible to approve easements on the parkland. Applications are available from the Easement Coordinator, Fairfax County Park Authority, Planning and Development Division, 12055 Government Center Parkway, Suite 406, Fairfax, Virginia 22035; main telephone number (703) 324-8741.

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

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VIRGINIA DEQ (continued)

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

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

(Responses are continued on next page)

Emily Stock
DC2RVA Draft EIS Recommendations
Page 2

- Any of the above listed Fairfax County Park Authority owned parks could experience direct significant impacts of lost land, recreation facilities, vegetation, and habitat, increased storm water discharge, invasive species, and wildlife habitat impacts. Therefore, we would like to review all future documents and plans at the earliest opportunity as the project progresses.
- The Park Authority requires any adverse impacts either temporary or permanent, to its natural resources to be rehabilitated or otherwise mitigated/compensated, including any terrestrial or aquatic natural resource impact that is not regulated under the jurisdiction of any Federal or state agency. Mitigation/compensation for permanent impacts shall be determined using the most current version of the Fairfax County Department of Public Works and Environmental Services Unit Price Schedule to determine a replacement cost. Forest, woodland, and shrubland habitat types shall be mitigated/compensated for at \$56,420 an acre. Grassland shall be mitigated/compensated for at \$18,246 an acre. Total impacts and mitigation/compensation costs shall be determined upon completion of the site design.
- The Park Authority requests more information in order to provide additional comments, including:
 - More detailed maps of the project corridor.
 - Proposed easements or acquisitions on parkland, including impacts to activities, features, and attributes of the parks where applicable, including natural areas, and trees > 6" diameter at breast height (dbh).
 - Potential impacts of sound pollution by distance from the proposed rail line, with potential mitigation measures.
 - Assess the impacts of increased stormwater runoff resulting from the conversion of existing forested areas into graded or built features.
 - Locations of proposed stormwater management (SWM) facilities.
 - Identify direct impacts to any local waterways.
 - Identify whether any bridges will need to be replaced to accommodate the proposed rail line.
- There is a potential for impacts to Native American and Historical Sites within the Southeast High Speed Rail Corridor. If the project is to impact undisturbed areas not previously subjected to archaeological survey, the scope of work for this EIS should include Phase I archaeological surveys for the previously undisturbed areas. If significant sites are found, Phase II archaeological testing is recommended to determine significance or eligibility for inclusion onto the National Register of Historic Places. If sites are found significant, avoidance or Phase III data recovery is recommended. If existing sites of significance are to be impacted, additional work will be warranted. If Federal permitting or funding is involved with the project it will trigger Section 106, requiring DRPT to consult with the Virginia Department of Historic Resources (VDHR) by Federal regulation.

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VIRGINIA DEQ (continued)

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

Emily Steck
DC2RVA Draft EIS Recommendations
Page 3

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

140

Sincerely,



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

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

VIRGINIA DEQ (continued)

(Response to comment 140 on previous page)

VIRGINIA DEQ (continued)

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

Howard, Janine (DEQ)

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

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

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

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

Good Afternoon Mr. Nelson,

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

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

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

Janine Howard
 Environmental Impact Review Coordinator

Office of Environmental Impact Review
 Division of Environmental Enhancement
 Virginia Department of Environmental Quality
 629 E. Main Street
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 f: (804) 698-4032

141



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October 18, 2017

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

JAMES R.
FOLEY,
MAYOR

STEVEN P.
TRIVETT
VICE MAYOR

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JOSHUA S.
FARRAR
TOWN MANAGER

ANDREA E.
ERARD
TOWN ATTORNEY

JOSEPH A.
COLLINS
CLERK OF COUNCIL

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

Ms. Howard,

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

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

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

Respectfully,

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

www.ashlandva.gov

142

VIRGINIA DEQ (continued)

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

Chapter 1, Purpose and Need for the Proposed Action

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

143

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

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3. Section 1.6.2.1 - The stated purpose of the SEHSR program, as stated in the Tier I EIS, is to provide a competitive transportation choice to travelers within the Washington, D.C. to Charlotte travel corridor. Implementation of improved passenger rail service in the Washington, D.C. to Charlotte SEHSR corridor could:

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

145

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

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

- Upgrade existing rail corridors (instead of developing new corridors)

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VIRGINIA DEQ (continued)

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

(Responses are continued on next page)

Chapter 1, Purpose and Need for the Proposed Action

1. Chapter 1, Purpose and Need for the Proposed Action, and Appendices I (Operations Modeling) and J (Ridership), do not include any analyses of the potential effects of foreseeable technological changes over the next 8-10 years, such as autonomous vehicles and intelligent transportation systems, on the need for the project. Because the operations simulation modeling incorporates long-term assumptions, and construction of the Ashland segment would not even begin for fifteen years, it is critical that the assumptions regarding future demand for rail freight and passenger service reflect the best, most current information about the likely effects of technological change upon transportation needs. The model should also be updated to reflect current information at least every 2-3 years.
2. Section 1.4 Project Purpose identifies "improving the frequency, reliability, and travel time of passenger rail operations in Virginia and beyond, and providing a competitive alternative to highway and air travel" as a benefit listed in the Tier I EIS completed in 2002. The travel time goal expressed by the Virginia Department of Rail and Public Transportation (VADRPT) was to save fifteen (15) minutes for travelers between Richmond and Washington D.C. Upon notification from FRA in the spring of 2017 that this goal would not be met VADRPT commenced to change the criteria by reducing this goal to about five (5) minutes. Not only does this change reduce the benefit associated with the project as a whole, but from a process standpoint it is a dramatic change which has 1. Largely gone undiscussed by VADRPT staff, and 2. Would likely change the perception of many who have previously commented on the Tier I and Tier II DEIS. In this instance, the Town believes further public outreach and education should be conducted, in addition to further opportunities to publicly comment, to ensure citizens and stakeholders have the most current information, and are not commenting to support a benefit which VADRPT is no longer attempting to accomplish.
3. Section 1.6.2.1 - The stated purpose of the SEHSR program, as stated in the Tier I EIS, is to provide a competitive transportation choice to travelers within the Washington, D.C. to Charlotte travel corridor. Implementation of improved passenger rail service in the Washington, D.C. to Charlotte SEHSR corridor could:
 - Provide a more balanced and energy-efficient use of the corridor's transportation infrastructure

The Town of Ashland would request that additional study be made which addresses improvements in technology and energy efficiency associated with train travel that uses electric trains. The dramatic shift energy efficiency over the past fifteen years should not be ignored as DRPT and FRA plan future rail expansion projects.
4. The Tier I ROD for the Washington, D.C. to Charlotte SEHSR selected an incremental (step-by step) approach to develop the SEHSR program. Key elements of the selected incremental approach are:
 - Upgrade existing rail corridors (instead of developing new corridors)

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145

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VIRGINIA DEQ (continued)

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

(Responses are continued on next page)

VIRGINIA DEQ (continued)

Chapter 1, Purpose and Need for the Proposed Action

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

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

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3. Section 1.6.2.1 - The stated purpose of the SEHSR program, as stated in the Tier I EIS, is to provide a competitive transportation choice to travelers within the Washington, D.C. to Charlotte travel corridor. Implementation of improved passenger rail service in the Washington, D.C. to Charlotte SEHSR corridor could:

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

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

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

- Upgrade existing rail corridors (instead of developing new corridors)

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

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

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

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

Chapter 2, Alternatives

- Section 2.3.3-1 – Alternatives Development in Fredericksburg (Build Alternative Area 3) and Ashland (Build Alternative Area 5) identify two additional options within each of these areas. The two new options are no additional track and Two-Track Bypass. Due to the extensive impacts to the Ashland community the Town believes additional consideration should be given to an option previously screened out which has been called the Deep Bore Tunnel. This option would avoid all the impacts associated with building in Alternative Area 5 while garnering unanimous community, local government, and state elected official support.
- Table 2.4-3 contains an error on the “Location/DC2RVA Build Alternative Area” box for Vaughan Road. This location is listed as area 4 when it should in fact be listed as area 5.
- Table 2.3-3 lists station notes for the Vaughan Road station as “Limited Connectivity to east-west primary roadways, possible conflicts with local land use, and distance from Ashland’s central urban area” as reasons for it being dismissed from further consideration. Familiarity with the area and the future land use of Town would lead to the exact same analysis for the Ashcake Road station location, but for some reason it was carried forward based on potential conflicts of existing station locations in the Town of Ashland with DC2RVA improvements. The Town would prefer the Ashcake station location be removed from further consideration because it has limited connectivity to east-west primary roadways, possible conflicts with local land use, and distance from Ashland’s central urban area. At a minimum, the DEIS should be updated to include further explanation of why the Ashcake station was brought forward even though it shares the exact same factors as the Vaughan Road station location.

VIRGINIA DEQ (continued)

(Response to comment 146 on previous page)

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

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

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

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

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

VIRGINIA DEQ (continued)

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

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151. DRPT and FRA considered a deep bore tunnel during the alternatives development and evaluation process, and dismissed the concept from further consideration during screening of potential alternatives (as reported in Alternatives Technical Report, Appendix A of the Draft EIS) due to high costs and potential impacts within the Town of Ashland. The concept of a deep bore tunnel – both a deep hard-rock version and a shallower soft-earth version – was further evaluated and considered by the Town of Ashland/Hanover County Community Advisory Committee (CAC) process (refer to Section 3.3 of the Final EIS for CAC details). The CAC members dismissed the deep bore tunnel as an unlikely alternative due to its anticipated cost, impacts to the Town from ventilation towers and other structures, and potential operational concerns.
152. The FRA and DRPT have identified Alternative 5A, which will maintain two tracks through Ashland, as the Preferred Alternative (refer to Section 4.3.5 of the Final EIS for details on the selection process). DRPT and FRA considered several eastern bypass alignments during the alternatives development and evaluation process, and dismissed the concept from further consideration during screening of potential alternatives (as reported in Alternatives Technical Report, Appendix A of the Draft EIS) due to high costs and potential impacts to parks, property, infrastructure (including Route 1 and I-95), and wetlands. Concept AEB1, in particular would have required additional right-of-way through an existing park. The concept of an eastern bypass, including AEB 1 through the park was further evaluated and considered by the CAC process (refer to Section 3.3 of the Final EIS for CAC details). The CAC dismissed the eastern bypass alternatives due to their high costs and impacts to property, infrastructure, and the park, and identified a western bypass alternative, known as AWB 1, as their "least objectionable" bypass alternative.

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

(Responses are continued on next page)

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

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VIRGINIA DEQ (continued)

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

VIRGINIA DEQ (continued)

(Response to comment 154 on previous page)

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

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

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

(Responses are continued on next page)

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

11. Table 2.5-11 – The Town believes the only alternative included in this table which would not destroy our community is 5C. As noted above, the Town would request that an additional deep bore tunnel alternative be added for consideration.

12. Section 2.6.1.2 concludes that, "DRPT's preliminary conclusion, based on the schedule, infrastructure, and operating parameters evaluated in this second phase of operations simulation was that, while a third main track through Ashland or a two-track bypass around Ashland would accommodate the Project's service and performance goals through 2045, other alternatives should be considered, perhaps in concert with service and schedule modifications, that could also achieve the Project's service and performance goals." This statement appears to be an attempt by DRPT to justify the two track no build option which is commonly referred to as the 3-2-3. The Town, and presumably the citizenry at large, would have to know significantly more about the "service and schedule modifications" that could make this option achieve the Project's service and performance goals before considering it valid. The Town would hope that FRA would similarly require DRPT to provide further explanation in the DEIS to explain this very vague justification for an alternative "that having only two main tracks in Fredericksburg and/or Ashland failed to dispatch (i.e., the operations simulation concluded that the infrastructure had insufficient capacity for the number of trains projected to operate in the corridor in the years 2045)." Once again, the Town would encourage DRPT and the FRA to consider the Deep Bore Tunnel if alternatives other than the third track through Ashland or two track bypass are to be considered.

Chapter 3: Affected Environment

1. Section 3.6.2 discussed Clean Air Act Conformity. While not included in the DEIS, an option known as the Three Track Trench is included in the Technical Supplemental Report. The Town believes the trench portion of this option would have significant yet unstudied impacts on air quality as fumes and exhaust from trains traveling through the trench would naturally waft up to the surface of a pedestrian friendly residential and downtown business district. The Town believes, 1. The three track trench option should be completely removed from further consideration, and 2. If a trench is considered it should be nearly completely capped and incorporate active ventilation to prevent air quality issues in Town.

2. Section 3.7.2 Vibration – The Town of Ashland opposes the construction of a third rail through the center of Town as identified in several options in Alternative Area 5. The additional vibration associated with a third set of tracks and additional trains would have a negative impact on our historic buildings in our downtown commercial district as well as the historic homes that line the tracks in the residential section of Town. These structures already endure considerable vibration which cracks foundations and shatters historic windows. The addition of a third track that is not only closer to these structures, but brings with it the opportunity for a third train to be simultaneously passing through Town, would vibrate these structures to an extent that significant damage would be inevitable.

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

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

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

Chapter 3: Affected Environment

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

VIRGINIA DEQ (continued)

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

(Responses are continued on next page)

VIRGINIA DEQ (continued)

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

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

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

Chapter 3: Affected Environment

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

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

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

Chapter 4: Environmental Consequences

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

VIRGINIA DEQ (continued)

(Response to comment 159 on previous page)

160. The designation of the Ashland/Hanover Visitor Center to a community facility has been corrected; refer to the errata table for the Draft EIS, which is Appendix A to the Final EIS. The FRA and DRPT have selected Alternative 5A: Maintain Two Tracks Through Town, which would will maintain the existing two track railroad through Ashland, as the Preferred Alternative (refer to Section 4.3.5 of the Final EIS for details on the selection process). The Preferred Alternative does not impact this community facility.
161. DRPT has responded to the Ashland Museum comments that the Town provided; refer to DRPT-numbered statements #197 through #235.
162. The requested corrections have been addressed in the errata table for the Draft EIS, which is Appendix A to the Final EIS.
163. and 164. FRA and DRPT have identified Alternative 5A, which will maintain two tracks through Ashland, as the Preferred Alternative (refer to Section 4.3.5 of the Final EIS for details). Section 4.9.1 of the Draft EIS describes the visual assessment methodology. While DRPT understands the Town of Ashland's concern with Build Alternatives 5B and 5D, the "High" visual impact rating does not apply as per the visual assessment methodology because the railroad tracks are already a predominant visual feature through town.
165. DRPT reviewed the business relocation analysis and concluded that the information as presented in Section 4.11.1 of the Draft EIS is correct. However, because Build Alternative 5A: Maintain Two Tracks Through Town was selected as the Preferred Alternative, there will be no permanent or temporary construction impacts to the businesses; refer to Final EIS Section 5.11 for details.

VIRGINIA DEQ (continued)

(Response to comment 165 on previous page)

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

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

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

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

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

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

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

Chapter 5: Section 4(f) Evaluation

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

VIRGINIA DEQ (continued)

(Response to comments 170 and 171 on previous page)

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

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

(Responses are continued on next page)

VIRGINIA DEQ (continued)

173. Refer to DRPT-numbered statement #167. Preferred Alternative 5A will not require any closure of Center Street / Railroad Avenue in the Town of Ashland. All modifications to address necessary changes to traffic flow and operations resulting from the Preferred Alternative will conform to all applicable current AASHTO and VDOT standards.
174. Additional details on this comment are included in the attachment from the Ashland Museum. Refer to DRPT-numbered statements #201-235 for a detailed response.

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

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

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

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Chapter 6: Public Involvement and Agency Coordination

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

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Chapter 7: DRPT Recommended Preferred Alternative

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

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VIRGINIA DEQ (continued)

175. The Draft EIS, prepared by FRA and DRPT in accordance with the National Environmental Policy Act (NEPA) and its implementing regulations, describes the alternatives development process and for Area 5 (Ashland) evaluates in detail seven alternatives, including Alternative 5A, Maintain two Tracks through Town. While there is no requirement within NEPA to identify a preferred alternative as part of Draft EIS documentation, the Draft EIS for the Project identified DRPT's recommended preferred alternative for the corridor, but did not recommend a specific preferred alternative for Area 5 (Ashland). Instead, DRPT established a CAC to further review and inform the evaluation of alternatives for Area 5, which is summarized in Section 3.3 of the Final EIS. The CAC met five times in open public meetings to review Project alternatives and identified, from a community perspective, the least objectionable through Town, western bypass, and below-ground alternatives. After reviewing all the comments received on the Draft EIS and considering the input from the CAC process, on December 6, 2017, DRPT provided the CTB with a final recommendation for a Preferred Alternative. The CTB formally identified Alternative 5A - Maintain Two Tracks Through Town as the Commonwealth of Virginia's Preferred Alternative for Area 5. FRA has agreed with and confirmed DRPT's recommendation that Alternative 5A meets the Purpose and Need of the DC2RVA Project.
176. DRPT has conducted the public outreach for the Project in accordance with FRA's requirements under NEPA and its implementing regulations. Beginning in 2014, DRPT held 4 public scoping meetings (including one in Ashland), 3 public meetings to present alternatives development and screening criteria, 3 public meetings to review preliminary alternatives screening results, and 1 public meeting in Hanover County to review the Project, proposed bypass routes, and access to private property. DRPT also held multiple meetings with representatives of the Town and County since the Project inception.

(Responses are continued on next page)

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VIRGINIA DEQ (continued)

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

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

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

(Responses are continued on next page)

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

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2. Table 6.3-1 lists the Ashland Museum as the only consulting party listed for the Town of Ashland. It should be noted that the Town of Ashland was not notified about participating as a consulting party until late in 2016; over a year after all other consulting parties had been invited and participated in analysis.

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VIRGINIA DEQ (continued)

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

VIRGINIA DEQ (continued)

(Response to comment 178 on previous page)

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

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

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

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

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

Appendix A: Alternatives Technical Report

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

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

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

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

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

Appendix I: Operations Modeling

VIRGINIA DEQ (continued)

(Response to comment 182 on previous page)

183. Refer to DRPT-numbered statement #180 for response.
184. DRPT eliminated the area north of Vaughan Road for a new Ashland station as part of the alternatives analysis process and it was not considered as part of any of the Build Alternatives analyzed in the Draft EIS (refer to DRPT-numbered statement #150 for additional response). The Preferred Alternative for the Ashland Area is Build Alternative 5A: Maintain Two Tracks Through Town and, per the CTB resolution of December 6, 2017, will not include any modifications to the existing station location.
185. Refer to DRPT-numbered statement #179 for response. Build Alternatives 5B and 5D, each adding a track at grade through Ashland, have been evaluated in detail in the Draft EIS, and were not selected by FRA as the Preferred Alternative.
186. The North Ashland park polygon shown on Figure 3.14-1 in the Draft EIS was obtained from the VDOT CEDAR database - VA DCR "conservation land" dataset (July 2017). Section 4(f) applies when the land is one of the enumerated types of publicly owned lands and the public agency that owns the property has formally designated and determined it to be significant for park, recreation area, or wildlife and waterfowl refuge purposes. Evidence of formal designation would be the inclusion of the publicly owned land, and its function as a Section 4(f) property into a city or county Master Plan; an expression of interest or desire is not sufficient. While the North Ashland Park is included the Town of Ashland's Comprehensive Plan and Parks and Recreation Master Plan, the park location and boundaries are not clearly identified. Additional conversations in January 2018 with Mr. Joseph Collins, Town of Ashland Parks and Recreation Coordinator, indicate the development of North Ashland Park stalled several years ago due to the recession and the location for the development of the future park was never established. The future land use in this area is identified as a mix of government and open space. Given this information, this area would not be considered a Section 4(f) resource at this time. North Ashland Park has been removed as a Section 4(f) resource as indicated in the errata table for the Draft EIS, which is Appendix A of the Final EIS.

(Responses are continued on next page)

VIRGINIA DEQ (continued)

187. The parcel affected in the vicinity of Giddy Up Lane is Parcel ID 7779-76-4998. It is the common area of the Lance and Bridle subdivision. There are no residential relocations in this area.
188. Partial parcel acquisition and one commercial relocation on Ashcake Road would occur under Build Alternative 5B as evaluated in the Draft EIS. However, Alternative 5A was selected as the Preferred Alternative for Area 5; refer to Final EIS Section 5.11 for impacts of the Preferred Alternative on Community Resources, including relocations.

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

5. Section 8.3.5.9 Vaughan Road (Ashland Station Replacement) states, "The existing Ashland station (see Section 8.3.5.11 below) lacks designated parking and other station facilities, and requires improvement to its platforms to comply with ADA and meet the DC2RVA Basis of Design for intercity passenger service." It should be noted in the DEIS and FEIS that the Town is working on a platform improvement project with Amtrak, CSX, and FRA that will begin construction in 2018 and fix/alleviate all the failings noted in the quoted description above.
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3. The Aerial Mapbooks for Option 5B which places an additional track to the east of the two existing railroad tracks shows a red track proposed and green permanent limits of disturbance line that would result in a substantial number of takings in downtown Ashland. The Town requests that these takings be represented through the DEIS to show the true impact in Alternative Area 5.

Appendix I: Operations Modeling

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

Appendix Q: Community Impact Assessment Technical Report

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

Appendix R: Cultural Resources Report

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

VIRGINIA DEQ (continued)

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

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

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

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

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

VIRGINIA DEQ (continued)

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

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

Other Comments

1. The Town of Ashland believes any consideration of the three track trench should be discontinued due to the fact that it was created by DRPT at the last CAC meeting, and has not been engineered or evaluated sufficiently to warrant moving forward in the DEIS or FEIS. In addition, the Town of Ashland was told the deep bore tunnel would be unlikely to be built due to its cost even though cost is not supposed to be considered as part of the NEPA process. This fact is what led the Deep Bore Tunnel to be replaced by the Three Track Trench as the least objectionable alternative "underground" by the CAC. The Town would like to reiterate that the deep bore tunnel would have not only been listed as a least objectionable alternative by the CAC, but would have received unanimous support as the Preferred Alternative for Alternative Area 5 had it not been for DRPT staff introducing cost as consideration
2. While not included in the DEIS, an option known as the Three Track Trench is included in the Technical Supplemental Report. The Town believes the trench portion of this option would have significant yet unstudied impacts on air quality as fumes and exhaust from trains traveling through the trench would naturally waft up to the surface of a pedestrian friendly residential and downtown business district. The Town believes, 1. The three track trench option should be completely removed from further consideration, and 2. If a trench is considered it should be nearly completely capped and incorporate active ventilation to prevent air quality issues in Town.
3. The Three Track Trench option would lead to dramatic business closures in the fifteen to twenty year lead up to construction. Those closures and would accelerate during the three construction window. The Three Track Trench option would constitute an unacceptable economic hardship on the business and property owners along the construction path, but also to the Town of Ashland.
4. DRPT and DC2RVA engineering staff worked with the community to develop plans for a 350-foot platform at the existing Ashland station which would mitigate most, if not all, of the property impacts, especially to Randolph-Macon College, or a station project.

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May 31, 2017

JAMES R.
FOLEY,
MAYOR

JAMES D.
MURRAY
VICE MAYOR

GEORGE F.
SPAGNA, JR.
COUNCIL MEMBER

STEVEN P.
TRIVETT
COUNCIL MEMBER

KATHLEEN K.
ABBOTT
COUNCIL MEMBER

JOSHUA S.
FARRAR
TOWN MANAGER

ANDREA E.
ERARD
TOWN ATTORNEY

JOSEPH A.
COLLINS
CLERK OF COUNCIL

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

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

Dear Dr. Barile,

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

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

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

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

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VIRGINIA DEQ (continued)

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

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VIRGINIA DEQ (continued)

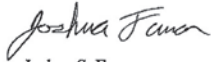
(Response to comment 196 on previous page)

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

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

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

Sincerely,



Joshua S. Farrar
Town Manager

cc. Ellen Wulf, Ashland Museum

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Attachment 1
Ashland Museum May 30, 2017, Comments

Phase IB Survey of Remaining Ashland Alternatives noted as Segment 13

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

- The 1982 DHR Survey of Ashland for the nomination of the Ashland Historic District was flawed and incomplete in its identification of historic resources.
- There were addresses that did not exist (110 S. Railroad Ave. is perhaps 210 S. Railroad Ave.), some misspelled street names (St. James Street is really James Street), and some mistakes in the dates of some of the buildings. And, in the architectural history world at that time, there was almost no interest in garages, barns, and other secondary buildings. Since then, the members of the Ashland Museum have researched some of the houses, found interesting facts about the owners, and corrected the dates. Some of those buildings might even be eligible for individual listing under criteria A or B of the DHR's standards when DHR can evaluate our research.
- In the spring of 2017, we are going to have an updated survey of the original district, which will allow us to include more buildings in the district for three reasons. First, the dates of the contributing members in the original survey were mid-19th century to 1932—50 years from 1982. Now the dates are going to be up to 1967. Second, while we will not necessarily accept any building that is 50 years old, we will look at the best examples of unmodified Craftsman bungalows and other Craftsman style buildings, ranch or rambler style homes, and Art Deco architecture. Ashland Theatre (1948) and McArdle Insurance Building (1940s) are two that might be included. Third, there are a number of barns, garages or carriage houses, and other service buildings that will be considered for inclusion in the updated survey, where we can verify age and if the construction has not been substantially modified.
- In 2018, the Town in cooperation with the Ashland Museum will be expanding the district boundaries to include some structures on Thompson, Henry Clay, Howard, Racecourse, Berkley, Henry and other areas of town that contain significant buildings relating to the town history or that have interesting architecture. That would allow us to include Craftsmen commercial buildings such as Bryant's grocery, Jake Speer's gas station, and the Craftsmen bungalows on Thompson Street, for example. It might also include the Sears House on Berkeley Street and the Colman Hotel, now called the Elks Home on Henry Street and the Gandy School, a fine example of Prairie Style architecture. They tell part of our African-American story.
- The Area of Potential Effects (APE) does not fully reflect the devastating impacts the acquisition of expanded right of way and the construction of a third rail would have on the Ashland Historic District which is intended by the Virginia Department of Historic Resources and the National Department of Historic Places to be protected.
- The Town of Ashland community and the Randolph-Macon College campus would be irreparably split up the middle by the construction of a third rail destroying the integrity of both as viable entities.
- In the business district, a substantial number of historic and architecturally significant buildings along Railroad Avenue/Center Street would be significantly damaged. The business buildings are only about 30 or 40 feet from the center line of the railroad right of way. If a third rail is put through Ashland, the

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VIRGINIA DEQ (continued)

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

VIRGINIA DEQ (continued)

(Response to comment 197 on previous page)

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

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

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

197



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

May 30, 2017

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

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

Dear Kerri,

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

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

Phase IA Studies of the Bypass Alternative around Ashland

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

Phase IB Survey of Remaining Ashland Alternatives noted as Segment 13

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

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VIRGINIA DEQ (continued)

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

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

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

VIRGINIA DEQ (continued)

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

Page 2
Ashland Museum to Dr. Barile
May 30, 2017

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

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199

Ashland Museum

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Page 3
 Ashland Museum to Dr. Barile
 May 30, 2017

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

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

Sincerely,

Rosanne Groat Shalf

Betsy Hodges

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

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

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

199

VIRGINIA DEQ (continued)

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

VIRGINIA DEQ (continued)

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



NANCY ROSS HUGO

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

May 22, 2017

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

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

Dear Dr. Barile:

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

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

Sincerely,


Nancy Ross Hugo

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May 30, 2017

To Whom It May Concern:

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

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

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

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

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

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VIRGINIA DEQ (continued)

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

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

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

VIRGINIA DEQ (continued)

(Response to comment 200 on previous page)

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

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

Sincerely,



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

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

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

GIS # **DC2RVA:** Not eligible, but it does contribute to the district.
7870-71-2693

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

166-0001-0008	Ashland Station Depot, 112 N. Railroad Avenue	Ashland	c. 1923	Potentially Eligible Under A & C; Contributes to Ashland Historic District
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GIS # **DC2RVA:** Potentially Eligible Under C; Contributes to Ashland Historic District
7870-71-4742

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

166-0001-0011	House, 206 N. Center Street	Ashland	c. 1870	Not Eligible; Contributes to Ashland Historic District
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GIS # **DC2RVA:** Not Eligible; Contributes to Ashland Historic District.
7870-73-2227

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

VIRGINIA DEQ (continued)

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

(Responses are continued on next page)

VIRGINIA DEQ (continued)

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

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

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

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

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

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

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

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

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

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

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

GIS # 7870-71-5430
DC2RVA: Not eligible, but it does contribute to the district.

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

Ashland Museum Comments: Agree.

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

GIS # 7870-71-5324
DC2RVA: Not Eligible; Contributes to Ashland Historic District.

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

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



VIRGINIA DEQ (continued)

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

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VIRGINIA DEQ (continued)

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

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

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

GIS # **DC2RVA:** Not Eligible; Contributes to Ashland Historic District.
7870-71-5330

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

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

166-0001-0036	Commercial Building, 113 S. Railroad Avenue	Ashland	c. 1900	Not Eligible; Contributes to Ashland Historic District
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GIS # **DC2RVA:** Not Eligible; Contributes to Ashland Historic District.
7870-71-4278

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

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

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

GIS # **DC2RVA:** Not Eligible; Contributes to Ashland Historic District.
7870-70-4807

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

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

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

GIS # 7870-71-4278
DC2RVA: Potentially Eligible Under C; Contributes to Ashland Historic District
Ashland Historic District 2017 Survey Update Evaluation: Potentially Eligible Under C—"outstanding example of Second Empire-styled architecture."
Ashland Museum Comments: Should be eligible under C.

166-0001-0058	House, 706 S. Center Street	Ashland	c. 1868	Not Eligible; Contributes to Ashland Historic District
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GIS # 7779-69-8956
DC2RVA: Not Eligible; Contributes to Ashland Historic District
Ashland Historic District 2017 Survey Update Evaluation: "The resource is one of a few examples of Second Empire style in the Ashland Historic District; however, replacement windows and siding have negatively impacted its historic integrity (*This is wrong. See correction below.*) and better examples are found elsewhere in town. For these reasons it is recommended not eligible for individual listing in the NRHP under Criterion C. It has no known association with any events or individuals of historical significance and is therefore recommended not eligible for the NRHP under Criteria A and B."

Ashland Museum Comments: The renovation did not add siding or put in replacement windows. In a 2017 renovation, super low-profile storm windows were installed to protect the original window. Built in 1858, this house was modified with a mansard roof and other changes in 1870 by Sarah Elmira Royster Shelton. She was a widow when she bought it and moved there with her daughter and son-in-law. In early 2017 it was renovated. It retains original siding, windows, and window and door frame surrounds inside and out. Because it is one of the better examples of Second Empire architecture in the town, it should be considered as potentially eligible under Criterion C. It had been a boarding house when previously evaluated so it was not in good shape. Sarah Shelton herself has national and regional significance because she was the inspiration for "Tamerlane," Edgar Allen Poe's first major work. She and Poe were childhood sweethearts in Richmond. When Poe went away to UVA for his education, her parents intercepted their letters and both thought the other had forgotten their promises to each other. When Poe returned home and found that his Elmira had wed wealthy Alexander Shelton, he was heart-broken and he wrote "Tamerlane," about a lover who was abandoned by his sweetheart. After many years, both widowed, they came together again and considered marriage, but first Poe had to go on a business trip to Baltimore where he died. Because of this association, this house should be designated as potentially eligible under Criterion B.³

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

³ Agnes Bondurant, *Poe's Richmond* (Richmond: Poe Associates, 1978), pp 224-227; Kenneth Silverman, *Edgar A. Poe: Mournful and Never-ending Remembrance* (New York: Harper Collins Publishers, 1991), pp 30-40. "To One in Paradise" and "The Ballad" also may pertain to Sarah Elmira Shelton.

VIRGINIA DEQ (continued)

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

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VIRGINIA DEQ (continued)

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

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

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

GIS # 7779-69-8842
DC2RVA: Potentially Eligible Under C; Contributes to Ashland Historic District

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

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

166-0001-0077	House, 1005 S. Center Street	Ashland	c. 1890	Potentially Eligible Under C; Contributes to Ashland Historic District
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GIS # 7779-68-9418
DC2RVA: Potentially Eligible Under C; Contributes to Ashland Historic District

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

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

166-0001-0232	Commercial Building, 103-109 England Street	Ashland	c. 1950	Not Eligible, Contributes to Ashland Historic District
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GIS # 7870-71-5430
DC2RVA: Not Eligible; Contributes to Ashland Historic District.

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

Ashland Museum Comments: Agree.

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

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

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

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

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

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

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

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

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

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

166-0036; 166-0001-0063	MacMurdy House, 713 S. Center Street	Ashland	c. 1858	Potentially Eligible Under B and C; Contributes to Ashland Historic District
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GIS # **DC2RVA:** Potentially Eligible Under B and C; Contributes to Ashland Historic District
7779-79-1601

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

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

VIRGINIA DEQ (continued)

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

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VIRGINIA DEQ (continued)

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

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

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

GIS # 7779-68-6848 **DC2RVA:** Potentially Eligible Under A, B, and C; Contributes to Ashland Historic District

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

³ Interview with John Skelton Williams Jr. by Rosanne Groat Shalf.

⁴ Interview with Clifford Fleet of Richmond by Rosanne Groat Shalf.

166-0039; 166-0001-0082	Blair House, 1014 S. Center Street	Ashland	c. 1888	Not Eligible; Contributes to Ashland Historic District
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GIS # 7779-68-3016 **DC2RVA:** Not Eligible; Contributes to Ashland Historic District

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

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

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

GIS # **DC2RVA:** Not Eligible; Contributes to Ashland Historic District

7870-60-9649

&

7870-70-0585

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

166-5041	Priddy House, 107 Stebbins Street	Ashland	c. 1926	Potentially Eligible Under C
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GIS # **DC2RVA:** Potentially Eligible Under C

7870-60-6458

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

166-5072	Randolph-Macon College Historic District Expansion	Ashland	early 20th c. - mid-20th c.	Potentially Eligible Under Criteria A and C
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GIS # **DC2RVA:** Potentially Eligible Under Criteria A and C; [Contributes to Ashland Historic District]

7870-60-6458

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

Ashland Museum Comments: Agree.

VIRGINIA DEQ (continued)

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

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VIRGINIA DEQ (continued)

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

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

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

DC2RVA: Potentially Eligible Under A

166-5073-0010	House, Dabney Funeral Home, 600 B Street	Ashland	c. 1955	Potentially Eligible Under A; Contributes to Berkleytown Historic District
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GIS # **DC2RVA:** Potentially Eligible Under A; Contributes to Berkleytown Historic District
7870-84-8796

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

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

166-5073-	Commercial Building, 612 Henry Street Coleman Hotel	Ashland	1938-39	Not recognized by DC2RVA
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GIS # **DC2RVA:** Not recognized by DC2RVA, No recommendation
7870-84-8796

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

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

Race Course Addition

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

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

GIS # 7779-69-2300 **DC2RVA:** Not recognized by DC2RVA, No recommendation

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

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

VIRGINIA DEQ (continued)

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

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VIRGINIA DEQ (continued)

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

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

DHR Number	Name	City/County	Date of Construction	DC2RVA Project Team Recommendation
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Buildings in the Downtown Ashland Business District Missing from DC2RVA Table 6-1

166-0001-0239	Commercial Building, 205-209 England St Ashland Theatre	Ashland	1947	Not recognized by DC2RVA
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227

GIS # **DC2RVA:** Not recognized by DC2RVA, No recommendation
7870-71-9371

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

166-0001-0240	Commercial Building, 211 England Street U.S. Post Office	Ashland	1938-39	Not recognized by DC2RVA
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228

GIS # **DC2RVA:** Not recognized by DC2RVA, No recommendation
7870-81-0352

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

166-0001-0261	Commercial Building, 203 England Street Loving Ford	Ashland	1929	Not recognized by DC2RVA
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229

GIS # **DC2RVA:** Not recognized by DC2RVA, No recommendation
7870-71-8373

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

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

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



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

June 19, 2017

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

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

Dear Kerri:

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

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

Please contact us with any questions.

Sincerely,

Rosanne Groat Shalf

Betsy Hodges

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

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

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

VIRGINIA DEQ (continued)

(No comments on this page)

VIRGINIA DEQ (continued)

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

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

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

166-0001-0008, Ashland Station Depot, 112 N. Railroad Ave., 1923
 166-0001-0015, 310 N. Center St., 1895, Business Office, R-MC (Blackwell House)
 166-0001-0055, 702 S. Center St., 1850s
 166-0001-0060, 708 S. Center St., 1894
 166-0001-0077, 1005 S. Center St., 1890

Randolph-Macon College Historic District/Randolph-Macon College Historic Campus District/ Randolph-Macon College Complex Historic District

166-0002, Washington Franklin Hall, Duncan Memorial Chapel, Pace Lecture Hall
correct dates are Washington Franklin Hall – 1872, Pace Lecture Hall – 1876, Duncan Memorial Chapel – 1879

166-0036 and 166-0001-0063, 713 S. Center St., MacMurdo House, 1858

166-0037; 166-0001-0073, 904 S. Center St., 1886

166-5041, 107 Stebbins St., 1926

166-5072, Other R-MC Buildings, early- to mid-20th century, they are within the Ashland Historic District but not in R-MC Historic District,

166-0001-0084, 114 College Ave., Thomas Branch Building, 1904

166-0001-0243, Henry St., Peele Hall, 1922

166-0001-0244, Henry St., Mary Branch Residence Hall, 1906

166-5073, Berkleytown Historic District 1900-1965

166-5073-0010, 600 B St., Dabney Funeral Home, 1952

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

166-0001-0007, 104 N. Railroad Ave., Hanover National Bank Building, 1919

166-0001-0011, 206 N. Center Street, Ayers House, *correct date is 1866-70, columns added c. 1900*

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

166-0001-0036, 113 S. Railroad Ave., *correct date is 1870s or earlier*

166-0001-0040, 307 S. Railroad Ave., *correct date is pre-1900*

166-0001-0041, 403 S. Center St., *correct dates are 1858 (house), 1871 (shop)*

166-0001-0058, 706 S. Center St. *correct date is 1858/mansard roof added c. 1870*

166-0039, 166-0001-0082, 1014 S. Center St., 1888

166-0040; 166-0001-0044, 500 S. Center St., Hanover Arts and Activities Center/ Ashland Baptist Church, 1859

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

166-0001-0111, 402 Duncan St., House, 1891

166-0001-0240, 211 England St., USPO, *correct date is 1938-39*

166-0001-0261, 203 England Street, Commercial Building (Ford motor), 1921-29,

Berkleytown Historic District additions

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

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

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

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

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

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

234

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

235

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

VIRGINIA DEQ (continued)

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

VIRGINIA DEQ (continued)

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

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

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

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

Estimated Impact of
PROPOSED DC2RVA RAIL ALTERNATIVES ON THE TOWN OF ASHLAND




OCTOBER 30, 2017

MANGUM
economics


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VIRGINIA DEQ (continued)

Report prepared by



MANGUM
economics



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

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

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

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


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

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

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

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VIRGINIA DEQ (continued)



Executive Summary

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

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

i

VIRGINIA DEQ (continued)



3. Our analysis:

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

VIRGINIA DEQ (continued)



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

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

VIRGINIA DEQ (continued)

**Introduction**

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

The DC2RVA High-Speed Rail ProjectGeneral Description

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

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

VIRGINIA DEQ (continued)



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

Proposed Construction Alternatives for Ashland

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

- 1) Maintain two tracks through Ashland: This is sometimes called the 3:2:3 option. It would involve constructing a third track north and south of the Town of Ashland but maintaining the existing two tracks through town. This option would mean that all tracks through town remain within their existing right of way. There were two variants of this option. One left the Town of Ashland's existing train station at its current location and one required relocating it to Ashcake Road.
- 2) Add one track east of the existing two tracks running through Ashland: This option would involve adding an additional track through the Town of Ashland to the east of the existing two tracks. This option would require the acquisition of additional right of way and could potentially impact 42 parcels, although impacts would generally be limited to frontage, sidewalks, and driveways. This option would also necessitate closing a portion of Railroad Avenue and Center Street. There were two variants of this option. One left the Town of Ashland's existing train station at its current location and one required relocating it to Ashcake Road. It is anticipated that this option would involve a two-year period of construction in downtown Ashland.
- 3) Construct three tracks running through Ashland that would be centered within the existing right of way: This option would involve adding an additional track through the Town of Ashland but centering all three tracks on the existing right of way. This option would require the acquisition of additional right of way and could potentially impact 76 parcels, although impacts would generally be limited to frontage, sidewalks, and driveways. This option would also necessitate closing a portion of Railroad Avenue and Center Street. In addition, this option would require relocating the Town of Ashland's existing train station to Ashcake Road. It is anticipated that this option would involve a two-year period of construction in downtown Ashland.
- 4) Construct a three-track trench running through Ashland: This option would involve the construction of a trench, 11,000 feet long, 50 feet wide, and 33 feet deep, between Vaughan Road and Ashcake Road to accommodate three tracks through the Town of Ashland. This

VIRGINIA DEQ (continued)



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

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

FRA and DRPT Recommendations

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

Community Resolutions

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

VIRGINIA DEQ (continued)



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

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

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

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

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

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

VIRGINIA DEQ (continued)

**Background Information**

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

General Description

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

Recent Economic Trends

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

Total Employment

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

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

VIRGINIA DEQ (continued)

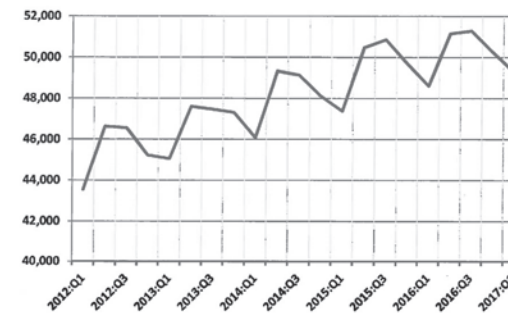


Figure 1: Hanover County Total Employment – 1st Quarter of 2012 through 1st Quarter of 2017²

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

²Data Source: Virginia Employment Commission.

VIRGINIA DEQ (continued)

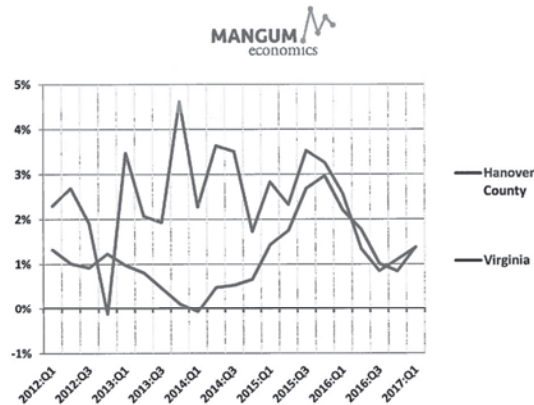


Figure 2: Year-Over-Year Change in Employment – 1st Quarter of 2012 through 1st Quarter of 2017³

Employment and Wages by Major Industry Sector

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

³Data Source: Virginia Employment Commission.

VIRGINIA DEQ (continued)

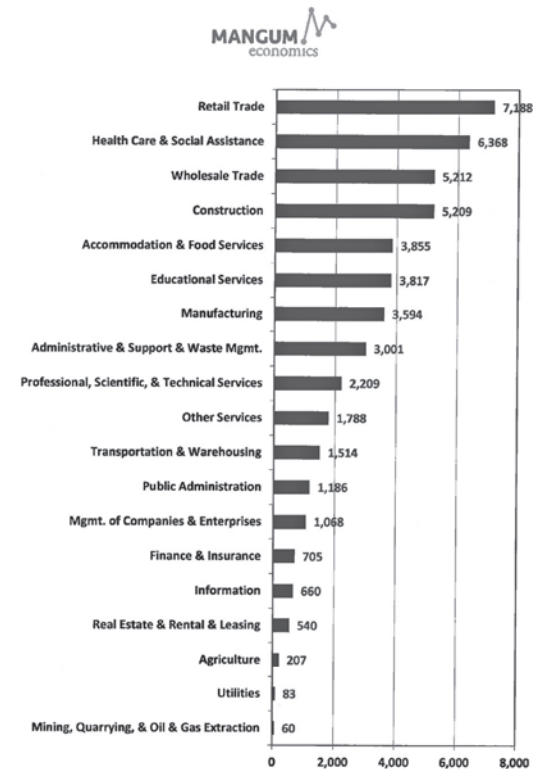


Figure 3: Employment by Major Industry Category in Hanover County in 2016⁴

⁴Data Source: Virginia Employment Commission.

VIRGINIA DEQ (continued)

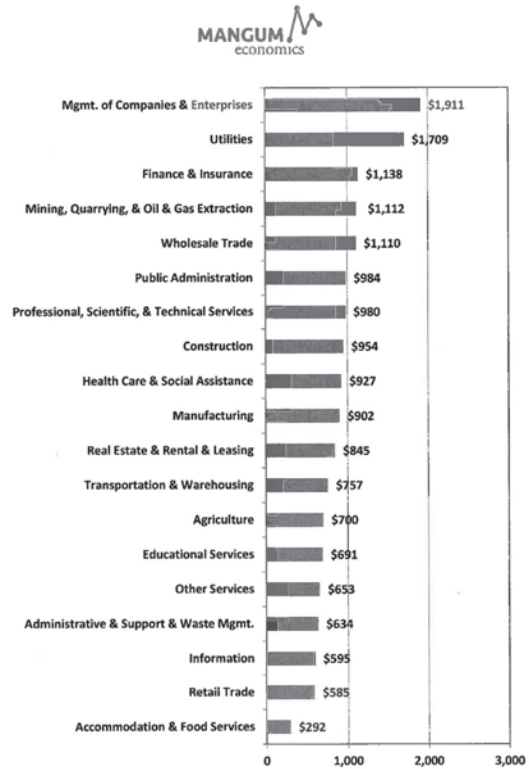


Figure 4: Average Weekly Wages Major Industry Category in Hanover County in 2016⁵

⁵Data Source: Virginia Employment Commission.

VIRGINIA DEQ (continued)

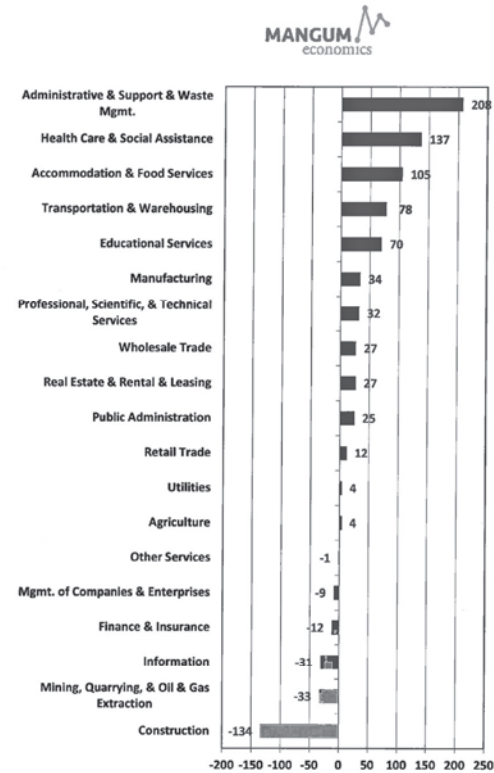


Figure 5: Change in Employment by Major Industry Category in Hanover County between 2015 and 2016⁶

⁶Data Source: Virginia Employment Commission.

VIRGINIA DEQ (continued)



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

Unemployment

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

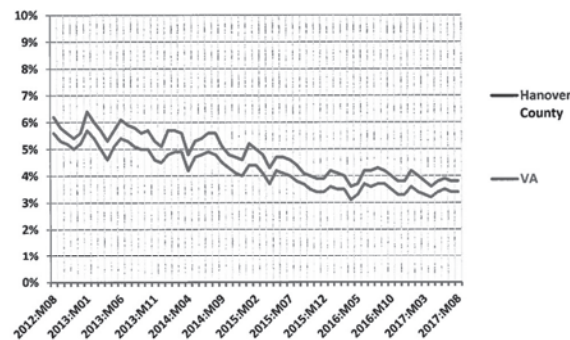


Figure 6: Unemployment Rate – August 2012 to August 2017⁷

⁷Data Source: Virginia Employment Commission.

VIRGINIA DEQ (continued)



Fiscal Trends

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

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

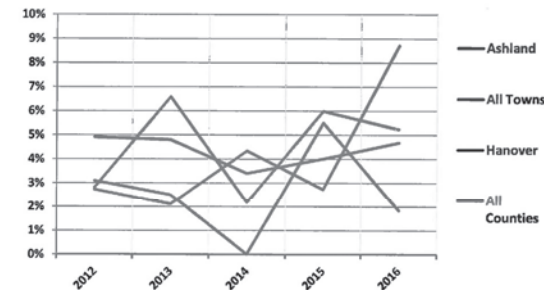


Figure 7: Year-Over-Year Change in Other Local Tax Revenue – 2008 through 2016⁸

⁸Data Source: Virginia Auditor of Public Accounts.

VIRGINIA DEQ (continued)



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

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

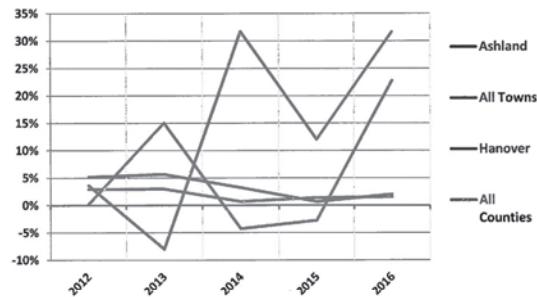


Figure 8: Year-Over-Year Change in Business License Tax Revenue – 2008 through 2016⁹

⁹Data Source: Virginia Auditor of Public Accounts.

VIRGINIA DEQ (continued)

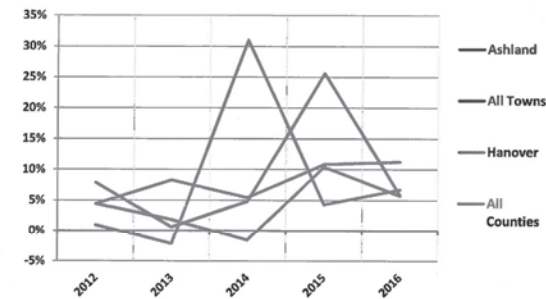


Figure 9: Year-Over-Year Change in Hotel and Motel Room Tax Revenue – 2008 through 2016¹⁰

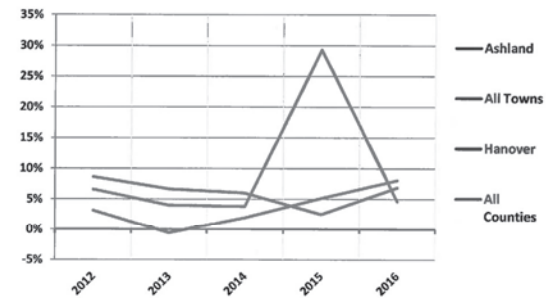


Figure 10: Year-Over-Year Change in Restaurant Meals Tax Revenue – 2008 through 2016¹¹

¹⁰Data Source: Virginia Auditor of Public Accounts.

¹¹Data Source: Virginia Auditor of Public Accounts.

VIRGINIA DEQ (continued)



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

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

In Sum

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

Economic and Fiscal Impact

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

VIRGINIA DEQ (continued)



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

Disruptive Impact of Construction

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

Focus Group

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

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

VIRGINIA DEQ (continued)



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

- 6) Concerns regarding the short-run, construction-driven, impact on tourism, and the potential long-run impact on tourism from relocating the existing train station and fundamentally altering the character of the town.
- 7) The potential negative impact on Randolph-Macon College, the Town of Ashland's primary economic engine.

Business Survey

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

- 1) Thirteen respondents indicated that they anticipated having to close or relocate their business.
- 2) Two respondents indicated that they anticipated a 50 percent loss of business.
- 3) One respondent indicated that they anticipated a 75 percent loss of business.

Literature Review

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

VIRGINIA DEQ (continued)



Los Angeles Metro Rail Red Line¹²

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

Central Corridor

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

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

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

¹² Rosalie Ray, "Open for Business? Effects of Los Angeles metro Rail construction on adjacent businesses," *Journal of Transport and Land Use*, vol.10, no.1 (2017) pp.725-742.

¹³ "Central Corridor Light Rail Transit Project Supplemental Draft Environmental Impact Statement for Construction-Related Potential Impacts on Business Revenues," Federal Transit Administration and Metropolitan Council, December 2012.

¹⁴ "Appendix D: Literature review for the Central Corridor Supplemental EIS," Federal Transit Administration and Metropolitan Council, December 2012.

VIRGINIA DEQ (continued)



- percent drop in sales), general merchandise (28 percent drop in sales), and home furnishings (17 percent drop in sales).
- Twelve percent of businesses surveyed reported experiencing a drop in sales of 40 percent or more during construction.
- 2) "Estimated Construction Period Impact of Widening State Highway 21 in Caldwell, Texas," Wildenthal and Buffington (1996):
- Based on a survey of businesses along a 2.3-mile highway widening project along the Highway 21 in Caldwell, Texas.
 - Sixty-three percent of respondents reported a decline in sales during construction, and 37 percent reported a decline of 25 percent or more in sales during construction.
- 3) "Mitigating the Adverse Impacts of the Dallas North Central Expressway Construction on Businesses," Harrison and Waldman (1998):
- Based on analysis of business-related construction impacts associated with an 18-mile highway reconstruction project on the North Central Expressway and the associated construction of adjacent Dallas Area Rapid Transit light rail line in Dallas, Texas.
 - Found no significant drop in business sales during construction.
 - Found a 10 percent drop in tenant occupancy rates during construction.
- 4) Highway Construction Impacts on Wyoming Business," Young, Wolfington, and Tomasini (2005):
- Based on surveys of businesses along twelve highway construction projects in Wyoming.
 - Found that affected businesses generally experienced reduced growth rates rather than negative growth rates during construction.
 - However, found that food-related retail, gas stations, and hotels were particularly susceptible to negative sales impacts during construction.
- 5) "Development of Improved Procedures for Business Accommodation on Transportation Projects," Ellis and Washburn (2005):
- Based on surveys of businesses along four highway reconstruction corridors in Florida.
 - Businesses reported issues with customers accessing their location, utility outages, and traffic congestion.
 - Found that fast-food retailers were more likely to report negative impacts on sales than destination businesses such as banks, specialty retailers, and insurance companies.
- 6) "Report on Mitigation of Transportation Construction Impacts," Minnesota department of Transportation (2009):
- Based on surveys of businesses along seven transportation construction projects in Minnesota.
 - Sixty-two percent of respondents reported lost sales due to construction.

VIRGINIA DEQ (continued)



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

In Sum

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

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

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

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

VIRGINIA DEQ (continued)



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

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

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

Scenarios

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

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

VIRGINIA DEQ (continued)



Economic Impact

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

Method

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

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

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

¹⁶ IMPLAN is produced by Minnesota IMPLAN Group, Inc.

VIRGINIA DEQ (continued)



Baseline Scenario

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

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

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

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

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

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

*May not sum due to rounding.

¹⁷ Data Source: Town of Ashland.

VIRGINIA DEQ (continued)



High Impact Scenario

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

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

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

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

¹⁸ Data Source: Town of Ashland.

VIRGINIA DEQ (continued)



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

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

*May not sum due to rounding.

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

Low Impact Scenario

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

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

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

¹⁹ Data Source: Town of Ashland.

VIRGINIA DEQ (continued)



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

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

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

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

*May not sum due to rounding.

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

Fiscal Impact

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

VIRGINIA DEQ (continued)



Baseline Scenario

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

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

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

²⁰ Data Source: Town of Ashland

²¹ Data Source: Town of Ashland. These data include tax revenue from Business License Tax (BPOL), Hotel and Motel Room Tax, Restaurant Meals tax, and Real Estate Tax.

²² Data Source: Town of Ashland and local sales and use tax revenue computations by Mangum Economics. These data include tax revenue from Local Sales and Use Tax and Real Estate Tax.

VIRGINIA DEQ (continued)



High Impact Scenario

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

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

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

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

VIRGINIA DEQ (continued)



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

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

²³ Data Source: Town of Ashland

²⁴ Data Source: Town of Ashland. These data include tax revenue from Business License Tax (BPOL), Hotel and Motel Room Tax, Restaurant Meals tax, and Real Estate Tax.

²⁵ Data Source: Town of Ashland and local sales and use tax revenue computations by Mangum Economics. These data include tax revenue from Local Sales and Use Tax and Real Estate Tax.

VIRGINIA DEQ (continued)



Low Impact Scenario

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

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

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

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

VIRGINIA DEQ (continued)



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

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

²⁶ Data Source: Town of Ashland

²⁷ Data Source: Town of Ashland. These data include tax revenue from Business License Tax (BPOL), Hotel and Motel Room Tax, Restaurant Meals tax, and Real Estate Tax.

²⁸ Data Source: Town of Ashland and local sales and use tax revenue computations by Mangum Economics. These data include tax revenue from Local Sales and Use Tax and Real Estate Tax.

VIRGINIA DEQ (continued)



Other Impacts

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

Tourism

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

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

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

²⁹ "The Economic Impact of Domestic Travel on Virginia Counties 2016," Virginia Tourism Corporation, September 2017.

³⁰ "The Economic Impact of Domestic Travel on Virginia Counties 2016," Virginia Tourism Corporation, September 2017.

³¹ Data Source: Randolph-Macon College.

³² Data Source: "2016 Ashland/Hanover Visitors Center Report," Ashland/Hanover Visitors Center.

VIRGINIA DEQ (continued)

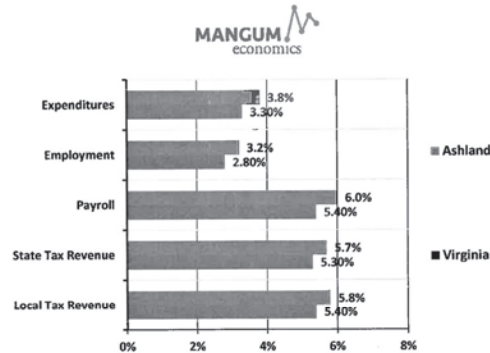


Figure 11: Year-Over-Year Change in Tourism Impact between 2015 and 2016³³

Randolph-Macon College

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

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

³³ "The Economic Impact of Domestic Travel on Virginia Counties 2016," Virginia Tourism Corporation, September 2017.

³⁴ Data Source: State Council of Higher Education for Virginia and Randolph-Macon College.

VIRGINIA DEQ (continued)



About three-quarters of Randolph-Macon College's students are Virginia residents. According to recent data from the Weldon Cooper Center, the number of college-age (20-24) individuals in Virginia is projected to decline by 4.3% between 2016 and 2020.³⁵ That decline will shrink the available pool of potential new students for Randolph-Macon College and other private and public Virginia colleges and universities. Moreover, it will likely place smaller private, non-profit, institutions such as Randolph-Macon College at a disadvantage, as they are forced to compete against larger, and heavily subsidized, public colleges and universities for a declining pool of potential new students.

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

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

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

VIRGINIA DEQ (continued)

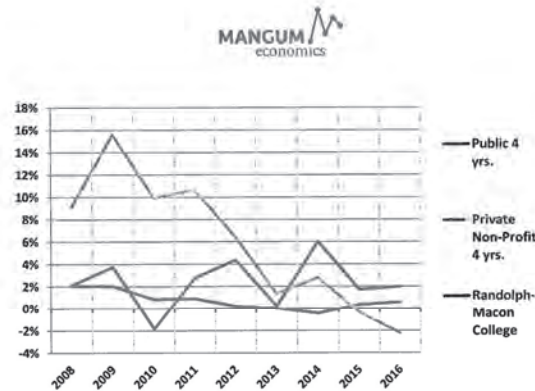


Figure 12: Year-Over-Year Change in Fall Headcount Enrollment³⁶

Ashland as a "Train Town"

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

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

VIRGINIA DEQ (continued)



Conclusion

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

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

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

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

VIRGINIA DEQ (continued)



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

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

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

VIRGINIA DEQ (continued)



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

VIRGINIA DEQ (continued)

Howard, Janine (DEQ)

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

Janine,

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

Thank you,
 Sarah Stewart

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

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

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

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

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

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

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VIRGINIA DEQ (continued)

Howard, Janine (DEQ)

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

Dear Ms. Howard:

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

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

Please contact us if you have any questions.

Sincerely,

Mark Bittner



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

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

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

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

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

Emily,

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

Sincerely,

Marc Holma

VIRGINIA DHR

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