APPENDIX B3

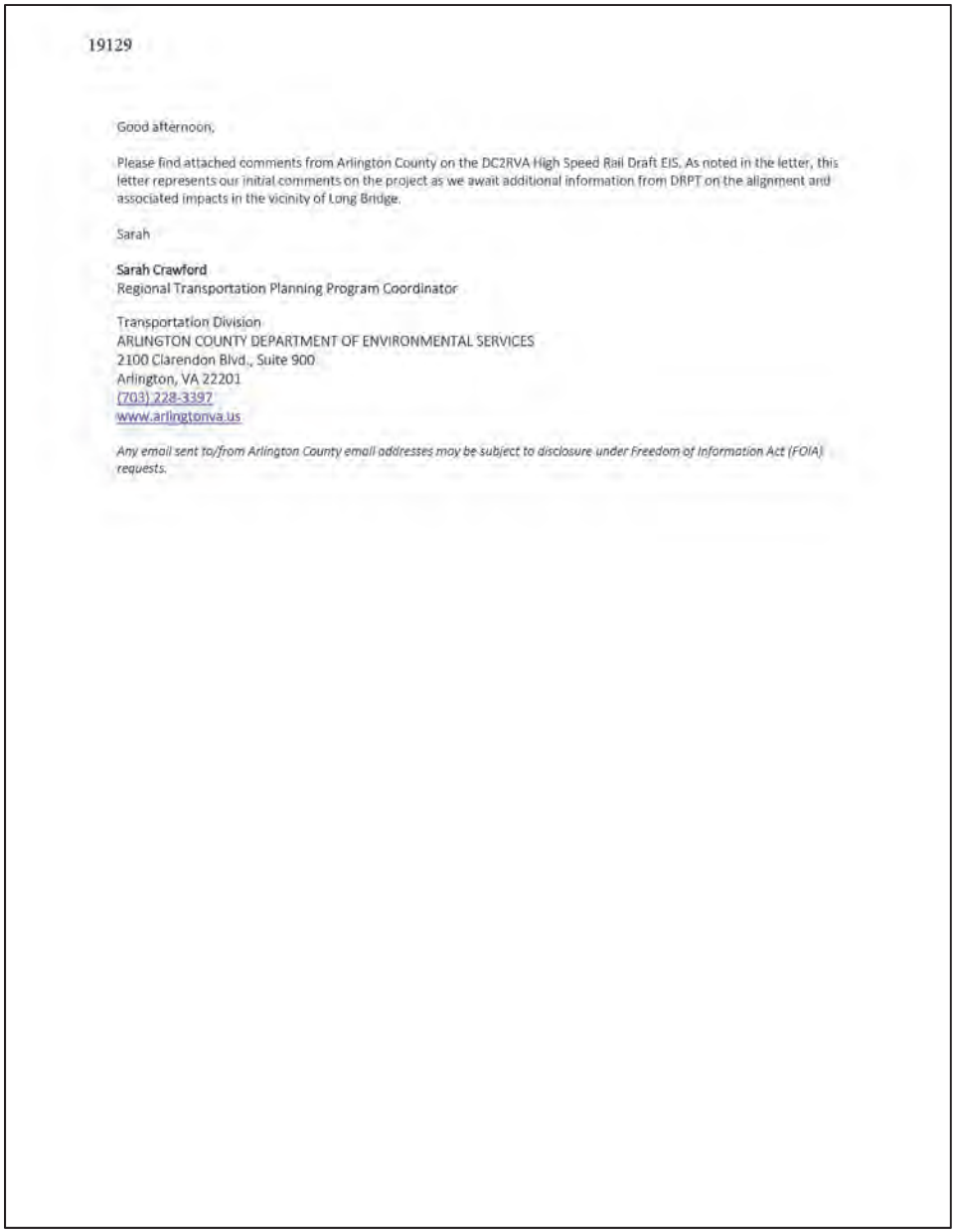
RESPONSES TO LOCAL AGENCY COMMENTS

D.C. TO RICHMOND SOUTHEAST HIGH SPEED RAIL

Appendix B3

RESPONSES TO LOCAL AGENCY COMMENTS

This Appendix Section B3 provides detailed responses to Local agency letters, presented in the below order:



19129

Good afternoon,

Please find attached comments from Arlington County on the DC2RVA High Speed Rail Draft EIS. As noted in the letter, this letter represents our initial comments on the project as we await additional information from DRPT on the alignment and associated impacts in the vicinity of Long Bridge.

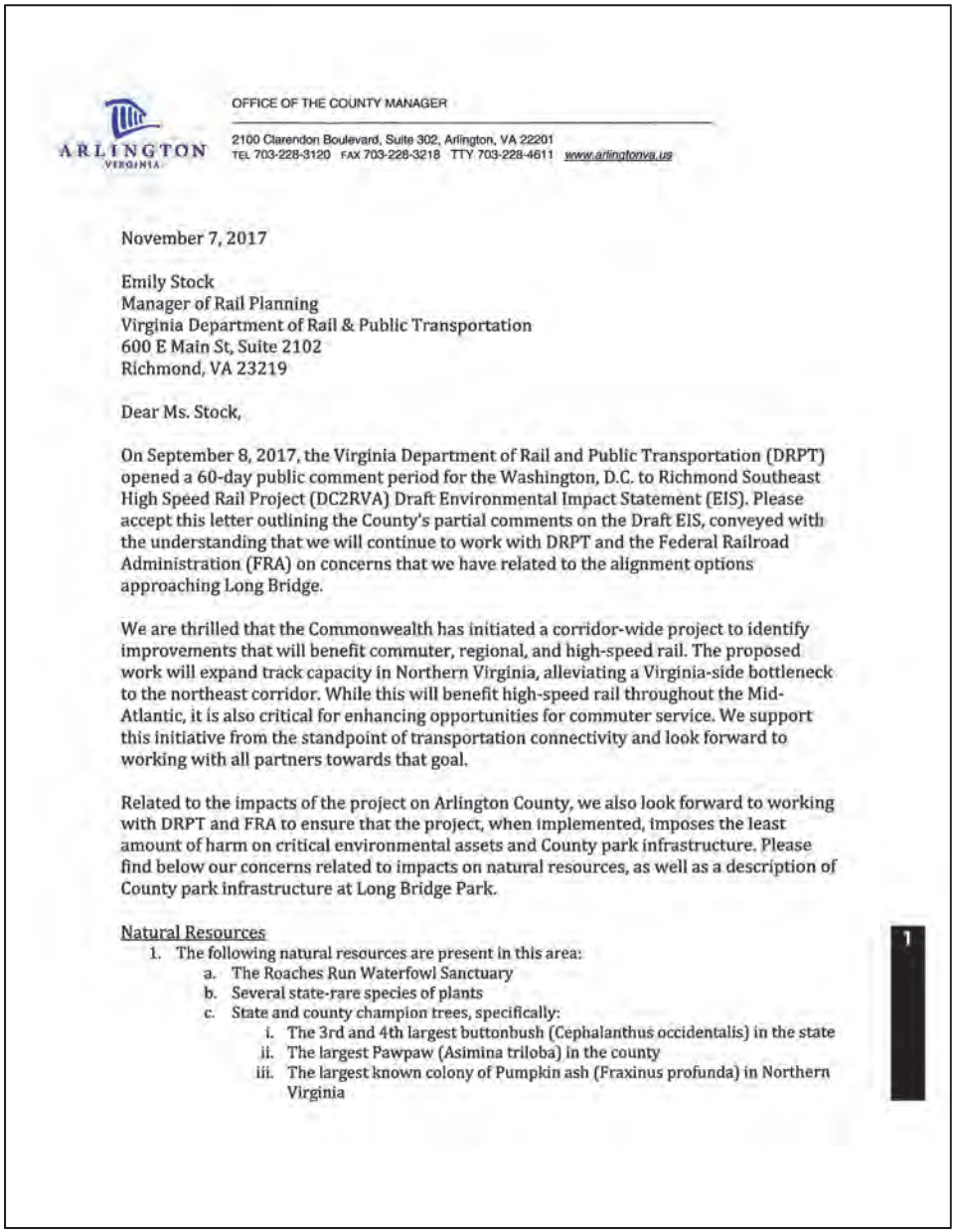
Sarah

Sarah Crawford
Regional Transportation Planning Program Coordinator

Transportation Division
ARLINGTON COUNTY DEPARTMENT OF ENVIRONMENTAL SERVICES
2100 Clarendon Blvd., Suite 900
Arlington, VA 22201
(703) 228-3397
www.arlingtonva.us

ARLINGTON COUNTY

(No comments on this page)



ARLINGTON VIRGINIA

OFFICE OF THE COUNTY MANAGER

2100 Clarendon Boulevard, Suite 302, Arlington, VA 22201
TEL 703-228-3120 FAX 703-228-3218 TTY 703-228-4611 www.arlingtonva.us

November 7, 2017

Emily Stock
Manager of Rail Planning
Virginia Department of Rail & Public Transportation
600 E Main St, Suite 2102
Richmond, VA 23219

Dear Ms. Stock,

On September 8, 2017, the Virginia Department of Rail and Public Transportation (DRPT) opened a 60-day public comment period for the Washington, D.C. to Richmond Southeast High Speed Rail Project (DC2RVA) Draft Environmental Impact Statement (EIS). Please accept this letter outlining the County's partial comments on the Draft EIS, conveyed with the understanding that we will continue to work with DRPT and the Federal Railroad Administration (FRA) on concerns that we have related to the alignment options approaching Long Bridge.

We are thrilled that the Commonwealth has initiated a corridor-wide project to identify improvements that will benefit commuter, regional, and high-speed rail. The proposed work will expand track capacity in Northern Virginia, alleviating a Virginia-side bottleneck to the northeast corridor. While this will benefit high-speed rail throughout the Mid-Atlantic, it is also critical for enhancing opportunities for commuter service. We support this initiative from the standpoint of transportation connectivity and look forward to working with all partners towards that goal.

Related to the impacts of the project on Arlington County, we also look forward to working with DRPT and FRA to ensure that the project, when implemented, imposes the least amount of harm on critical environmental assets and County park infrastructure. Please find below our concerns related to impacts on natural resources, as well as a description of County park infrastructure at Long Bridge Park.

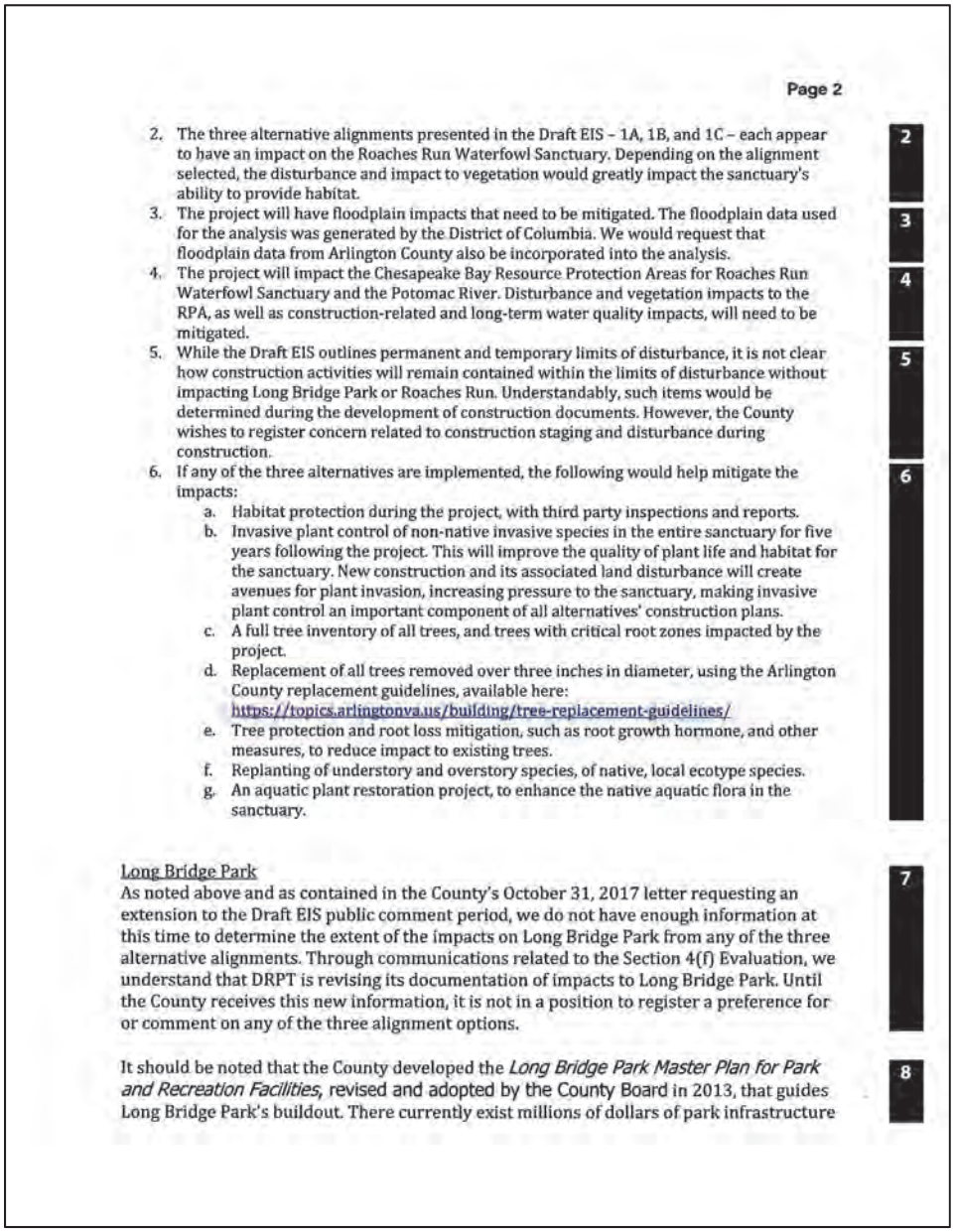
Natural Resources

1. The following natural resources are present in this area:
   a. The Roaches Run Waterfowl Sanctuary
   b. Several state-rare species of plants
   c. State and county champion trees, specifically:
      i. The 3rd and 4th largest buttonbush (Cephalanthus occidentalis) in the state
      ii. The largest Pawpaw (Asimina triloba) in the county
      iii. The largest known colony of Pumpkin ash (Fraxinus profunda) in Northern Virginia

1

ARLINGTON COUNTY (continued)

1. As stated in the Final Section 4(f) Evaluation for the Project (Chapter 6 of the Final EIS), the Preferred Alternative will not encroach upon the Roaches Run Waterfowl Sanctuary. Conceptual designs include retaining walls that will prevent encroachment (temporary or permanent) into the waters or riparian fringe of Roaches Run. Based on the CEDAR and Information for Planning and Consultation (IPaC) databases, no federally or state-listed threatened or endangered plant or animal species were identified as potentially occurring within the vicinity of the study area for the portion of the Project in Arlington County, as indicated in Final EIS Section 5.10.3. Discussions and review between DRPT and the County Department of Parks and Recreation, subsequent to the County's submission of these comments on the Draft EIS, indicate that the noted champion trees are not within the proposed Limits of Disturbance (LOD) for the Project.



Page 2

2. The three alternative alignments presented in the Draft EIS – 1A, 1B, and 1C – each appear to have an impact on the Roaches Run Waterfowl Sanctuary. Depending on the alignment selected, the disturbance and impact to vegetation would greatly impact the sanctuary's ability to provide habitat.
3. The project will have floodplain impacts that need to be mitigated. The floodplain data used for the analysis was generated by the District of Columbia. We would request that floodplain data from Arlington County also be incorporated into the analysis.
4. The project will impact the Chesapeake Bay Resource Protection Areas for Roaches Run Waterfowl Sanctuary and the Potomac River. Disturbance and vegetation impacts to the RPA, as well as construction-related and long-term water quality impacts, will need to be mitigated.
5. While the Draft EIS outlines permanent and temporary limits of disturbance, it is not clear how construction activities will remain contained within the limits of disturbance without impacting Long Bridge Park or Roaches Run. Understandably, such items would be determined during the development of construction documents. However, the County wishes to register concern related to construction staging and disturbance during construction.
6. If any of the three alternatives are implemented, the following would help mitigate the impacts:
   a. Habitat protection during the project, with third party inspections and reports.
   b. Invasive plant control of non-native invasive species in the entire sanctuary for five years following the project. This will improve the quality of plant life and habitat for the sanctuary. New construction and its associated land disturbance will create avenues for plant invasion, increasing pressure to the sanctuary, making invasive plant control an important component of all alternatives' construction plans.
   c. A full tree inventory of all trees, and trees with critical root zones impacted by the project.
   d. Replacement of all trees removed over three inches in diameter, using the Arlington County replacement guidelines, available here: https://topics.arlingtonva.us/building/tree-replacement-guidelines/
   e. Tree protection and root loss mitigation, such as root growth hormone, and other measures, to reduce impact to existing trees.
   f. Replanting of understory and overstory species, of native, local ecotype species.
   g. An aquatic plant restoration project, to enhance the native aquatic flora in the sanctuary.

Long Bridge Park

As noted above and as contained in the County's October 31, 2017 letter requesting an extension to the Draft EIS public comment period, we do not have enough information at this time to determine the extent of the impacts on Long Bridge Park from any of the three alternative alignments. Through communications related to the Section 4(f) Evaluation, we understand that DRPT is revising its documentation of impacts to Long Bridge Park. Until the County receives this new information, it is not in a position to register a preference for or comment on any of the three alignment options.

It should be noted that the County developed the *Long Bridge Park Master Plan for Park and Recreation Facilities*, revised and adopted by the County Board in 2013, that guides Long Bridge Park's buildout. There currently exist millions of dollars of park infrastructure

ARLINGTON COUNTY (continued)

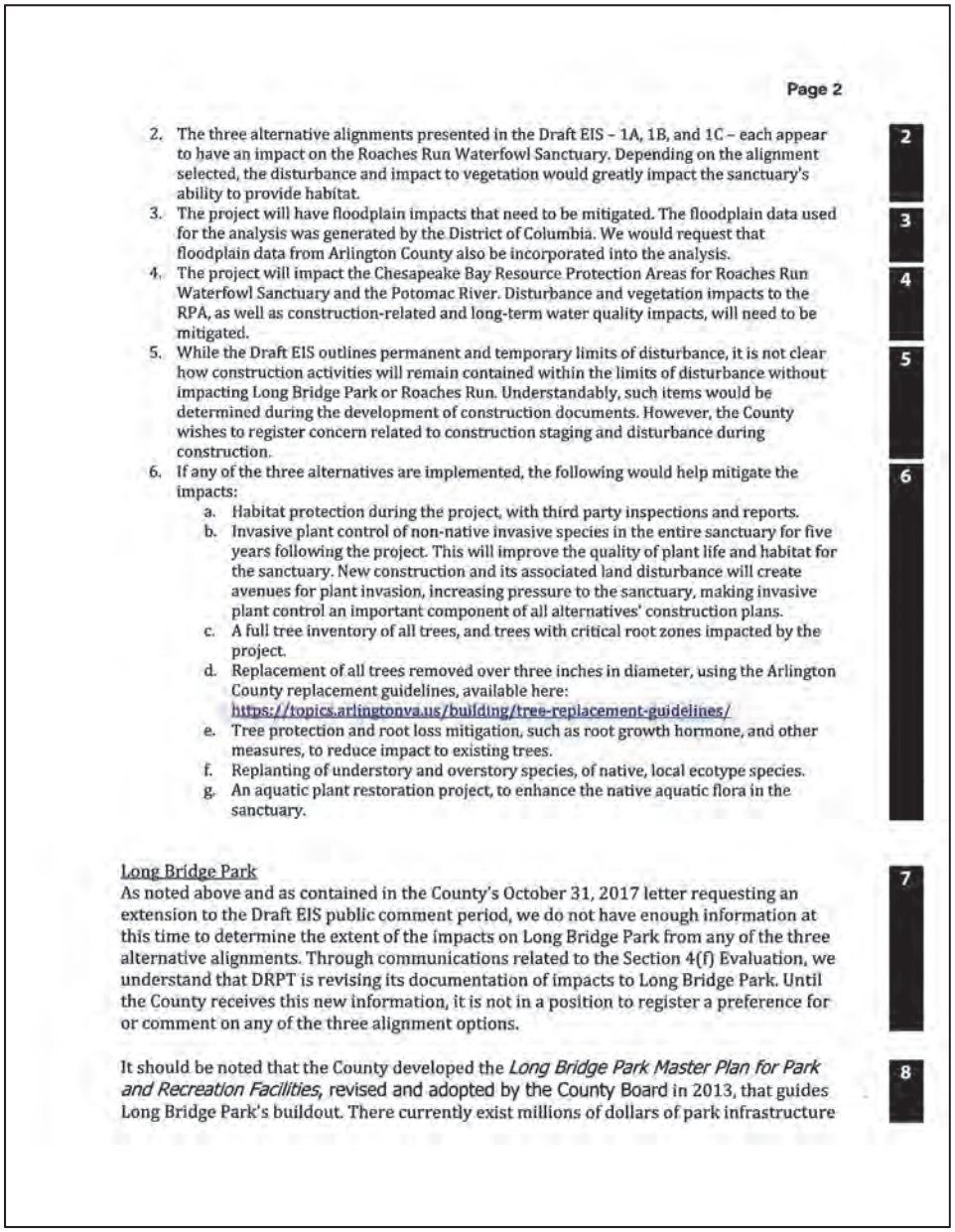
2. No lands will need to be acquired from the Roaches Run Waterfowl Sanctuary. As stated in the Final Section 4(f) Evaluation for the Project (Chapter 6 of the Final EIS), the Preferred Alternative will not encroach upon the Roaches Run Waterfowl Sanctuary and therefore will not disturb vegetation within the Sanctuary. Alternative 1B: Add Two Tracks on the West was selected as the Preferred Alternative in Area 1, to align with the two alternatives that were recommended in the alternatives report for the Long Bridge project (separate from the DC2RVA Project). Preferred Alternative 1B includes the least amount of disturbance on the east side of the existing CSXT right-of-way adjacent to the Roaches Run Waterfowl Sanctuary, with all proposed improvements contained within the railroad right-of-way.

3. Final EIS Section 5.1.6.2 addresses mitigation of floodplain impacts for the Preferred Alternative. As stated in Draft EIS Section 3.1.5, DRPT used floodplain mapping produced by the Federal Emergency Management Agency (FEMA) for the assessment of potential impacts to floodplains as required by US Department of Transportation Policy and FRA's Procedures for Considering Environmental Impacts. Additional floodplain mapping from local jurisdictions, including Arlington County, will be incorporated into the final design of the Project, as appropriate.

4. Final EIS Section 5.1.1.1 addresses Chesapeake Bay Preservation Act applicability and compliance of the Preferred Alternative.

5. DRPT will continue to coordinate with the County through final design and preparation of construction documents (both of which will occur after funding becomes available), specifically related to construction activities in the vicinity of parks. Temporary impacts to lands outside the railroad right-of-way will be minimized where practical, during final design and construction management planning, once funding is available and incremental improvements are scheduled.

(Responses are continued on next page)



Page 2

2. The three alternative alignments presented in the Draft EIS – 1A, 1B, and 1C – each appear to have an impact on the Roaches Run Waterfowl Sanctuary. Depending on the alignment selected, the disturbance and impact to vegetation would greatly impact the sanctuary's ability to provide habitat.
3. The project will have floodplain impacts that need to be mitigated. The floodplain data used for the analysis was generated by the District of Columbia. We would request that floodplain data from Arlington County also be incorporated into the analysis.
4. The project will impact the Chesapeake Bay Resource Protection Areas for Roaches Run Waterfowl Sanctuary and the Potomac River. Disturbance and vegetation impacts to the RPA, as well as construction-related and long-term water quality impacts, will need to be mitigated.
5. While the Draft EIS outlines permanent and temporary limits of disturbance, it is not clear how construction activities will remain contained within the limits of disturbance without impacting Long Bridge Park or Roaches Run. Understandably, such items would be determined during the development of construction documents. However, the County wishes to register concern related to construction staging and disturbance during construction.
6. If any of the three alternatives are implemented, the following would help mitigate the impacts:
   a. Habitat protection during the project, with third party inspections and reports.
   b. Invasive plant control of non-native invasive species in the entire sanctuary for five years following the project. This will improve the quality of plant life and habitat for the sanctuary. New construction and its associated land disturbance will create avenues for plant invasion, increasing pressure to the sanctuary, making invasive plant control an important component of all alternatives' construction plans.
   c. A full tree inventory of all trees, and trees with critical root zones impacted by the project.
   d. Replacement of all trees removed over three inches in diameter, using the Arlington County replacement guidelines, available here: https://topics.arlingtonva.us/building/tree-replacement-guidelines/
   e. Tree protection and root loss mitigation, such as root growth hormone, and other measures, to reduce impact to existing trees.
   f. Replanting of understory and overstory species, of native, local ecotype species.
   g. An aquatic plant restoration project, to enhance the native aquatic flora in the sanctuary.

Long Bridge Park

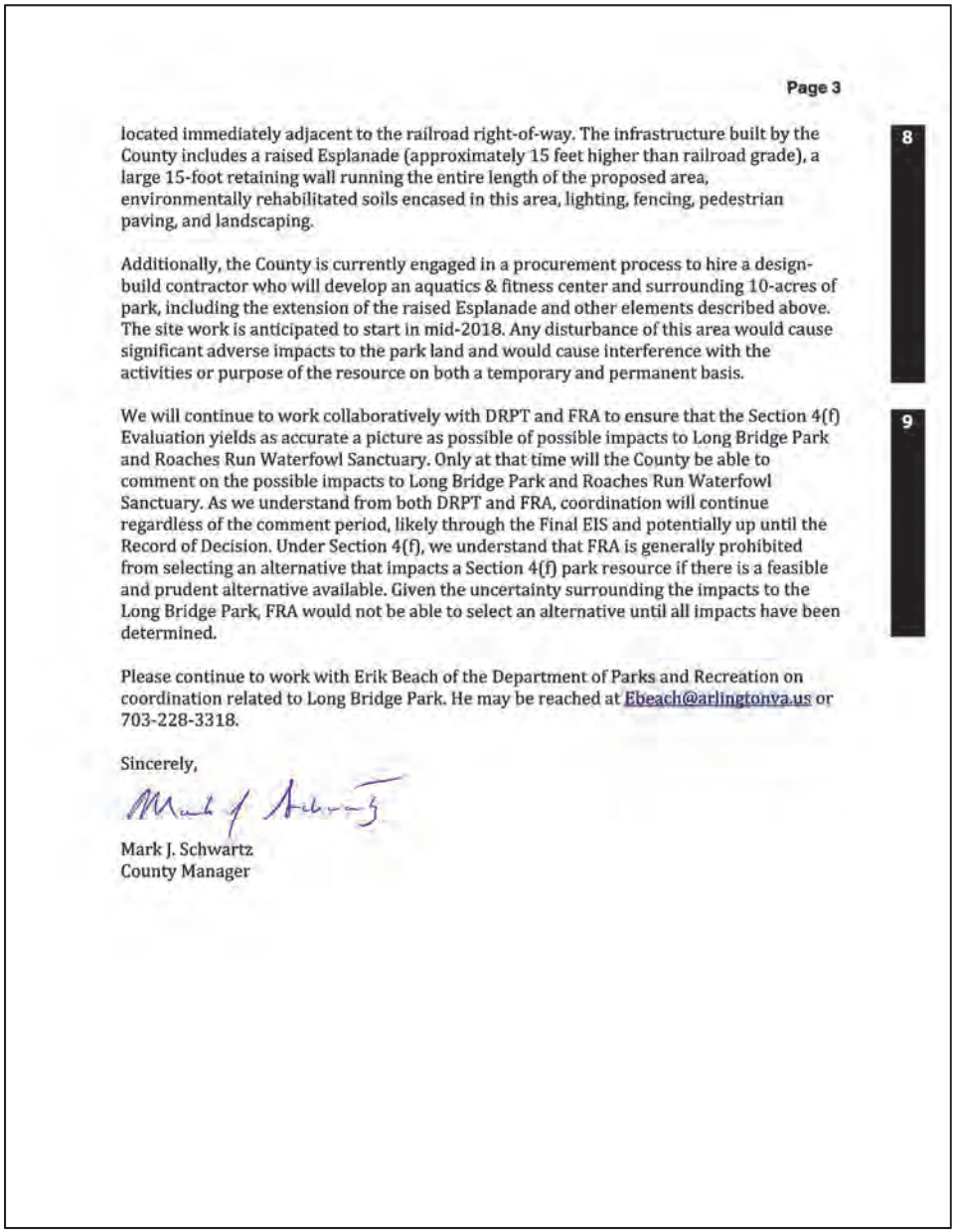
As noted above and as contained in the County's October 31, 2017 letter requesting an extension to the Draft EIS public comment period, we do not have enough information at this time to determine the extent of the impacts on Long Bridge Park from any of the three alternative alignments. Through communications related to the Section 4(f) Evaluation, we understand that DRPT is revising its documentation of impacts to Long Bridge Park. Until the County receives this new information, it is not in a position to register a preference for or comment on any of the three alignment options.

It should be noted that the County developed the *Long Bridge Park Master Plan for Park and Recreation Facilities*, revised and adopted by the County Board in 2013, that guides Long Bridge Park's buildout. There currently exist millions of dollars of park infrastructure

ARLINGTON COUNTY (continued)

6. Final EIS Section 5.10.3.2 discusses potential avoidance, minimization, and mitigation measures that could potentially be deployed, as required; final determinations on specific mitigation for threatened and endangered species (if required) will be made during final design (after funding becomes available and incremental improvements are scheduled) in coordination with regulatory agencies.

7. and 8. DRPT has reviewed updated information provided by the County and refined the conceptual engineering design to further minimize impacts to Long Bridge Park since the publication of the Draft EIS. Alternative 1B: Add Two Tracks on the West was selected as the Preferred Alternative in Area 1, to align with the two alternatives that were recommended in the alternatives report for the Long Bridge project (separate from the DC2RVA Project). Preferred Alternative 1B includes the installation of two new tracks adjacent to the Long Bridge Park; however, all proposed improvements will be within the existing railroad right-of-way in this area. Accordingly, no land will need to be acquired from Long Bridge Park for Preferred Alternative 1B and no existing park features or proposed plans will be disturbed. Preferred Alternative 1B will require temporary impacts to Long Bridge Park located to the west of the existing CSXT right-of-way, as indicated in the Final Section 4(f) Evaluation (Chapter 6 of the Final EIS); however, these will be temporary construction impacts and existing or proposed park activities will not be impacted. DRPT will continue to coordinate with the County regarding potential impacts to Long Bridge Park during final design and construction, once funding is available and incremental improvements are scheduled.



Page 3

located immediately adjacent to the railroad right-of-way. The infrastructure built by the County includes a raised Esplanade (approximately 15 feet higher than railroad grade), a large 15-foot retaining wall running the entire length of the proposed area, environmentally rehabilitated soils encased in this area, lighting, fencing, pedestrian paving, and landscaping. 8

Additionally, the County is currently engaged in a procurement process to hire a design-build contractor who will develop an aquatics & fitness center and surrounding 10-acres of park, including the extension of the raised Esplanade and other elements described above. The site work is anticipated to start in mid-2018. Any disturbance of this area would cause significant adverse impacts to the park land and would cause interference with the activities or purpose of the resource on both a temporary and permanent basis.

We will continue to work collaboratively with DRPT and FRA to ensure that the Section 4(f) Evaluation yields as accurate a picture as possible of possible impacts to Long Bridge Park and Roaches Run Waterfowl Sanctuary. Only at that time will the County be able to comment on the possible impacts to Long Bridge Park and Roaches Run Waterfowl Sanctuary. As we understand from both DRPT and FRA, coordination will continue regardless of the comment period, likely through the Final EIS and potentially up until the Record of Decision. Under Section 4(f), we understand that FRA is generally prohibited from selecting an alternative that impacts a Section 4(f) park resource if there is a feasible and prudent alternative available. Given the uncertainty surrounding the impacts to the Long Bridge Park, FRA would not be able to select an alternative until all impacts have been determined. 9

Please continue to work with Erik Beach of the Department of Parks and Recreation on coordination related to Long Bridge Park. He may be reached at Ebeach@arlingtonva.us or 703-228-3318.

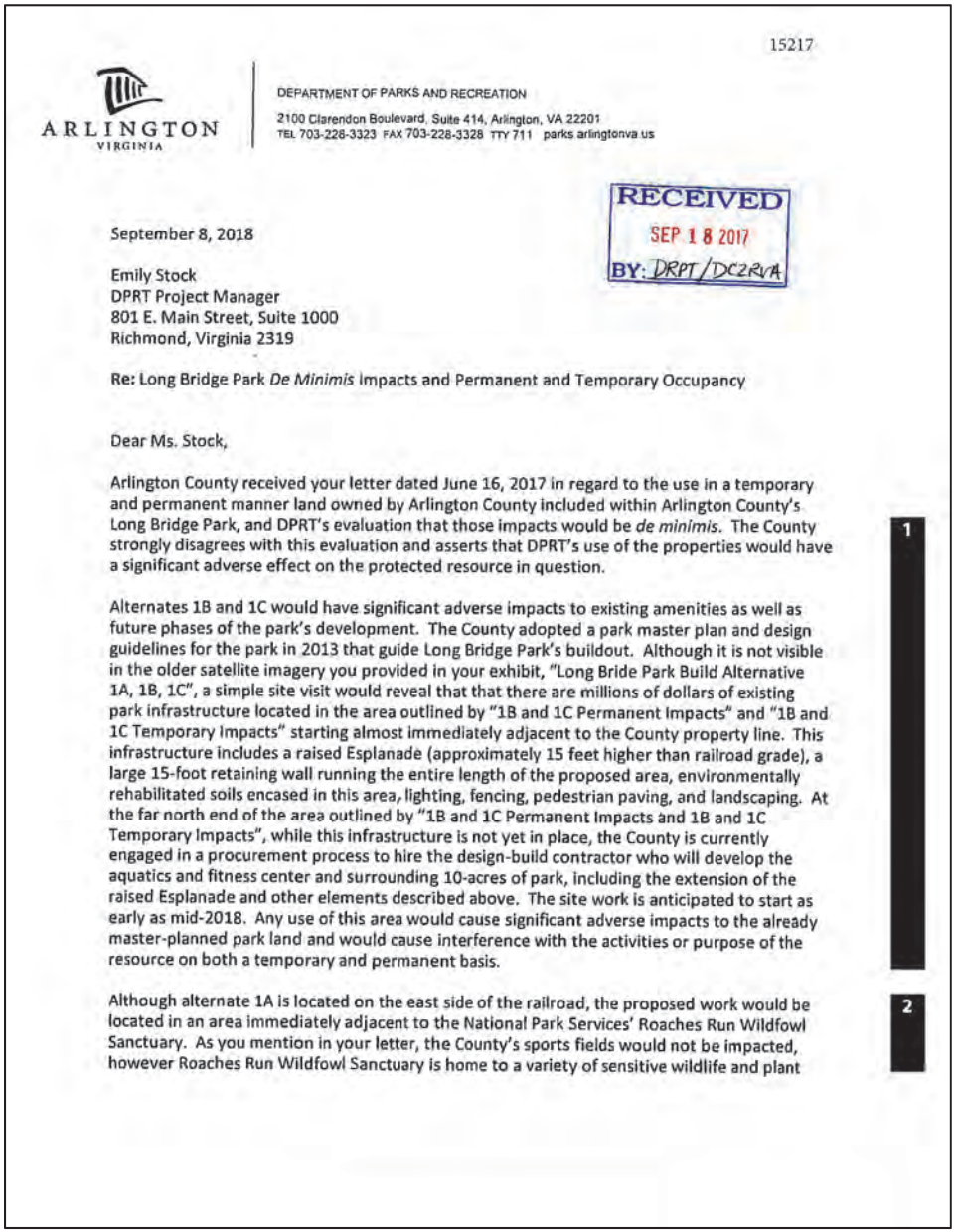
Sincerely,

Mark J. Schwartz
County Manager

ARLINGTON COUNTY (continued)

(Response to comment 8 on previous page)

9. FRA and DRPT appreciate the County's collaborative efforts. As stated previously, Preferred Alternative 1B will not permanently impact Long Bridge Park and will therefore not result in a Section 4(f) use for this resource; see Chapter 6 of the Final EIS. DRPT will continue to coordinate with the County regarding the potential temporary impacts associated with the Preferred Alternative 1B, as required.



15217

ARLINGTON
VIRGINIA

DEPARTMENT OF PARKS AND RECREATION
2100 Clarendon Boulevard, Suite 414, Arlington, VA 22201
TEL 703-228-3323 FAX 703-228-3328 TTY 711 parks.arlingtonva.us

RECEIVED
SEP 18 2017
BY: DRPT/DC2RVA

September 8, 2018

Emily Stock
DPRT Project Manager
801 E. Main Street, Suite 1000
Richmond, Virginia 2319

Re: Long Bridge Park *De Minimis* Impacts and Permanent and Temporary Occupancy

Dear Ms. Stock,

Arlington County received your letter dated June 16, 2017 in regard to the use in a temporary and permanent manner land owned by Arlington County included within Arlington County's Long Bridge Park, and DPRT's evaluation that those impacts would be *de minimis*. The County strongly disagrees with this evaluation and asserts that DPRT's use of the properties would have a significant adverse effect on the protected resource in question. 1

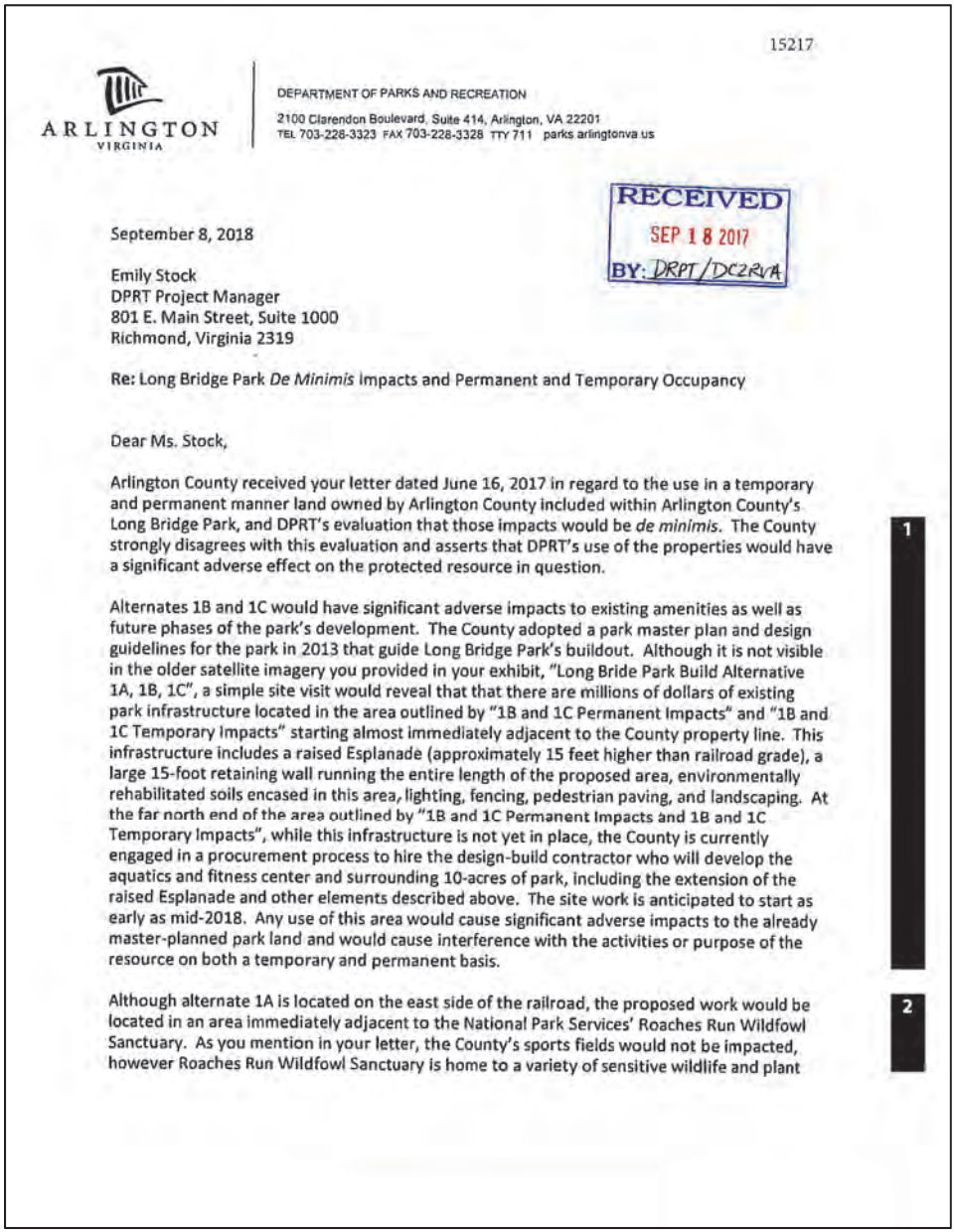
Alternates 1B and 1C would have significant adverse impacts to existing amenities as well as future phases of the park's development. The County adopted a park master plan and design guidelines for the park in 2013 that guide Long Bridge Park's buildout. Although it is not visible in the older satellite imagery you provided in your exhibit, "Long Bride Park Build Alternative 1A, 1B, 1C", a simple site visit would reveal that that there are millions of dollars of existing park infrastructure located in the area outlined by "1B and 1C Permanent Impacts" and "1B and 1C Temporary Impacts" starting almost immediately adjacent to the County property line. This infrastructure includes a raised Esplanade (approximately 15 feet higher than railroad grade), a large 15-foot retaining wall running the entire length of the proposed area, environmentally rehabilitated soils encased in this area, lighting, fencing, pedestrian paving, and landscaping. At the far north end of the area outlined by "1B and 1C Permanent Impacts and 1B and 1C Temporary Impacts", while this infrastructure is not yet in place, the County is currently engaged in a procurement process to hire the design-build contractor who will develop the aquatics and fitness center and surrounding 10-acres of park, including the extension of the raised Esplanade and other elements described above. The site work is anticipated to start as early as mid-2018. Any use of this area would cause significant adverse impacts to the already master-planned park land and would cause interference with the activities or purpose of the resource on both a temporary and permanent basis.

Although alternate 1A is located on the east side of the railroad, the proposed work would be located in an area immediately adjacent to the National Park Services' Roaches Run Wildfowl Sanctuary. As you mention in your letter, the County's sports fields would not be impacted, however Roaches Run Wildfowl Sanctuary is home to a variety of sensitive wildlife and plant 2

ARLINGTON COUNTY, DEPARTMENT OF PARKS AND RECREATION

1. These County comments are primarily in response to FRA's request for the County's concurrence in FRA's preliminary Section 4(f) determination as part of the Section 4(f) process, prior to the publication of the Draft EIS document. Alternative 1B: Add Two Tracks on the West was selected as the Preferred Alternative in Area 1, to align with the two alternatives that were recommended in the alternatives report for the Long Bridge project (separate from the DC2RVA Project). Preferred Alternative 1B includes the least amount of disturbance on the east side of the existing CSXT right-of-way of the evaluated Draft EIS Build Alternatives. Although DRPT's Section 4(f) coordination letter dated June 16, 2017 and the Draft EIS state that Build Alternative 1B would have impacts to Long Bridge Park, since that time DRPT has had further coordination with Arlington County on additional plans for park improvements and elevation changes that have eliminated the need for the permanent impacts to park lands to the west of the existing CSXT right-of-way. There would be no permanent acquisition of Long Bridge Park lands with the Preferred Alternative. The Preferred Alternative would require temporary construction impacts to the west of the existing CSXT right-of-way. These temporary construction impacts do not preclude the Master Plan development and would not impact other existing or proposed park activities. DRPT will continue to coordinate with the County regarding the potential temporary impacts associated with the Preferred Alternative. In a letter dated December 18, 2018, Arlington County Department of Parks and Recreation concurred with the Project impacts to Long Bridge Park (see Appendix E of the Final EIS).

(Responses are continued on next page)



15217

ARLINGTON
VIRGINIA

DEPARTMENT OF PARKS AND RECREATION
2100 Clarendon Boulevard, Suite 414, Arlington, VA 22201
TEL 703-228-3323 FAX 703-228-3328 TTY 711 parks.arlingtonva.us

RECEIVED
SEP 18 2017
BY: DRPT/DC2RVA

September 8, 2018

Emily Stock
DPRT Project Manager
801 E. Main Street, Suite 1000
Richmond, Virginia 2319

Re: Long Bridge Park *De Minimis* Impacts and Permanent and Temporary Occupancy

Dear Ms. Stock,

Arlington County received your letter dated June 16, 2017 in regard to the use in a temporary and permanent manner land owned by Arlington County included within Arlington County's Long Bridge Park, and DPRT's evaluation that those impacts would be *de minimis*. The County strongly disagrees with this evaluation and asserts that DPRT's use of the properties would have a significant adverse effect on the protected resource in question. 1

Alternates 1B and 1C would have significant adverse impacts to existing amenities as well as future phases of the park's development. The County adopted a park master plan and design guidelines for the park in 2013 that guide Long Bridge Park's buildout. Although it is not visible in the older satellite imagery you provided in your exhibit, "Long Bride Park Build Alternative 1A, 1B, 1C", a simple site visit would reveal that that there are millions of dollars of existing park infrastructure located in the area outlined by "1B and 1C Permanent Impacts" and "1B and 1C Temporary Impacts" starting almost immediately adjacent to the County property line. This infrastructure includes a raised Esplanade (approximately 15 feet higher than railroad grade), a large 15-foot retaining wall running the entire length of the proposed area, environmentally rehabilitated soils encased in this area, lighting, fencing, pedestrian paving, and landscaping. At the far north end of the area outlined by "1B and 1C Permanent Impacts and 1B and 1C Temporary Impacts", while this infrastructure is not yet in place, the County is currently engaged in a procurement process to hire the design-build contractor who will develop the aquatics and fitness center and surrounding 10-acres of park, including the extension of the raised Esplanade and other elements described above. The site work is anticipated to start as early as mid-2018. Any use of this area would cause significant adverse impacts to the already master-planned park land and would cause interference with the activities or purpose of the resource on both a temporary and permanent basis.

Although alternate 1A is located on the east side of the railroad, the proposed work would be located in an area immediately adjacent to the National Park Services' Roaches Run Wildfowl Sanctuary. As you mention in your letter, the County's sports fields would not be impacted, however Roaches Run Wildfowl Sanctuary is home to a variety of sensitive wildlife and plant 2

ARLINGTON COUNTY, DEPARTMENT OF PARKS AND RECREATION (continued)

2. Alternative 1B: Add Two Tracks on the West was selected as the Preferred Alternative in Area 1, to align with the two alternatives that were recommended in the alternatives report for the Long Bridge project (separate from the DC2RVA Project). Preferred Alternative 1B includes the least amount of disturbance on the east side of the CSXT right-of-way adjacent to the Roaches Run Waterfowl Sanctuary with all improvements contained within the railroad right-of-way. DRPT recognizes that Build Alternative 1A would be in close proximity to Roaches Run Waterfowl Sanctuary; however, DRPT has dismissed this alternative and there are no direct impacts to the sanctuary. Build Alternative 1B will require temporary impacts to Long Bridge Park located on the west side of the existing CSXT right-of-way. These temporary construction impacts will not impact existing or proposed park activities. Removal of trees and other vegetation in the temporary construction area will be limited to the extent feasible. The area will be restored and re-planted with native vegetation similar to prior conditions after completion of construction. DRPT will continue to coordinate with the County regarding the potential temporary impacts associated with Build Alternative 1B, as required.

species. Due to the proposed works close proximity to these resources, the County strongly disagrees with DPRT's evaluation as a *de minimis* impact. 2

As for the impacts to the Mt. Vernon Trail proposed by the DPRT, the County cannot respond to the request for concurrence. The exhibit is not detailed enough to specifically state, but it appears that area is owned either by the U.S. government or a private landowner. The County would like to be on record to state that, if the proposed work was to proceed in this area, it would be critical that trail users are able move through this area unimpeded as it is a critical transportation commuting route. 3

Thank you for your attention to this matter. If you have any questions, please feel free to contact the Long Bridge Park Project Executive, Erik Beach, at (703) 228-3318 or ebeach@arlingtonva.us

Respectfully,

Jane Rudolph, Director

cc:
Erik Beach, PDD
Michelle Cowan, CMO
Lisa Grandle, PDD
Stephen MacIsaac, CAO
Tim O'hora, DES

ARLINGTON COUNTY, DEPARTMENT OF PARKS AND RECREATION (continued)

(Response to comment 2 on previous page)

3. DRPT anticipates that approximately 20 feet of the Mount Vernon Trail owned by the National Park Service will be temporarily impacted during construction; however, the Mount Vernon Trail will remain connected and functional, to current levels of service, for all users during and after construction of the Project. The 20 feet of trail that would be temporarily impacted is located on the east side of the existing rail right-of-way on GWMP land opposite Crystal City Water Park and near Ronald Reagan National Airport. Details regarding maintaining access will be determined during final design, after funding becomes available and incremental improvements are scheduled.

OFFICE OF THE CITY MANAGER
301 King St., Suite 3500
Alexandria, VA 22314

MARK B. JINKS
City Manager

703.746.4300
Fax: 703.838.6343

November 7, 2017

Ms. Emily Stock
Manager of Rail and Planning
Virginia Department of Rail and Public Transit
801 East Main Street, Suite 1000
Richmond, Virginia 23219

Reference: D.C. to Richmond Southeast High Speed Rail - Tier II Draft Environmental Impact Statement

Dear Ms. Stock:

The City of Alexandria appreciates all of the work that the Commonwealth and the Department of Rail and Public Transportation (DRPT) are doing to improve transportation throughout the Commonwealth, including the Northern Virginia region. Thank you for the opportunity to provide comments on the D.C. to Richmond Southeast High Speed Rail - Tier II Draft Environmental Impact Statement (DEIS) and for facilitating a meeting between City and DRPT staff to address some of our preliminary concerns.

City staff have reviewed the DEIS and discussed with our City Council key concerns related to the impact of shifting existing tracks toward residential areas, property acquisition, noise and vibration impacts and mitigation, proposed walls along the corridor, and impacts to Alexandria Union Station parking. The resulting detailed list of questions and comments for you is provided in the attached document.

We look forward to continuing to work with DRPT on this important project. If you have any questions regarding these comments, please feel free to contact me.

Sincerely,

Mark B. Jinks
City Manager

Attachment: City of Alexandria Questions and Comments - DC2RVA DEIS

cc: The Honorable Mayor and Members of City Council
Emily A. Baker, P.E., Deputy City Manager
Yon Lambert, Director, Transportation and Environmental Services
Karl Moritz, Director, Planning and Zoning
Matt Melkerson, Acting Deputy Director, Transportation Planning and Transit
Allan Fye, Division Chief, Transit Services

CITY OF ALEXANDRIA

(No comments on this page)

November 6, 2017

DC2RVA Draft Environmental Impact Statement (DEIS) DRAFT

City of Alexandria Question and Comment Matrix

TOPIC	DEPARTMENT	ID #	QUESTIONS/COMMENTS	
Impact on planned future projects	Transportation & Environmental Services	1	Did the analysis consider only existing facilities? Or did it consider pipeline projects or planned development in Alexandria? For example, the North Potomac Yard Phase 1 development between Potomac Avenue and the railroad is anticipated to be completed by approximately 2021, which includes a linear park, mixed use development (including residential). Did the DEIS consider the North Potomac Yard area regarding park impacts, future trails, aesthetics, noise, aesthetics, the proposed school, etc.	1
		2	In Section 3.11.4.1., the description of the western part of the city is described as "commercial and industrial development". The project team should consult the Eisenhower West Small Area Plan to understand the future planned land uses in those areas.	2
Private or Business property Acquisition	Transportation & Environmental Services	3	Please clarify that there is no need to permanently acquire private property (residential) or business property in the City of Alexandria	3
Construction Impacts and Timeframe	Transportation & Environmental Services	4	Has any timeline been established for when construction would need to begin in order for operations to be in effect by 2025?	4
		5	How would the DC2RVA project construction and operations potentially affect the North Potomac Yard Metro station construction?	5
		6	Section 4.19 – How will the project construction affect roadway operations, especially where new overpasses are built, such as over King Street, and Commonwealth Avenue.	6
		7	Would private vehicle traffic be affected during construction? This includes potential traffic affectations related to grade-separated crossing improvements and for bridge stabilization or material removal?	7
		8	Would any rail spurs within the City of Alexandria be used during construction that could potentially bring affectations to regular traffic (cars, buses, metro rail bike/ped)?	8
		9	In the technical appendix Figure 2-24 Alexandria Union Station, the VRE pedestrian tunnel under the rail ROW is shown. Can you clarify how the DR2RVA project may impact the construction of this tunnel? How is the DC2RVA project coordinating with "others"?	9

1

CITY OF ALEXANDRIA (continued)

[Note that the City provided comments on November 7th, 2017 and revised comments on January 26th, 2018. The letter and comments/ responses provided herein reflect the more recent revised comments, as provided by the City.]

1. Future planned developments are taken into consideration throughout the Project process. Section 5.20 of the Final EIS discusses the potential indirect and cumulative effects of planned developments, and has been updated to include the Potomac Yard Metrorail Station and other major projects included in the City of Alexandria's Master Plan.

2. The existing land uses within 500 feet of the CSXT corridor are summarized in Table 3.11-4 of the Draft EIS. The top three existing land uses by acreage are Commercial/Office, Industrial, and Transportation. The existing residential areas within the Eisenhower West Small Area Plan are represented in Table 3.11-4 of the Draft EIS and the plan was consulted during the Project process.

3. DRPT has continued to review its available GIS parcel boundary data and conceptual engineering plans, and has determined there will be no permanent acquisitions of parcels (or portions of parcels) in the City of Alexandria. All Project improvements are designed to occur within existing railroad right-of-way within the City; where possible, retaining walls placed at the boundary of the right-of-way will be used to keep Project grading effects from adjacent lands. Improvements and impact limits at the Alexandria Station, including improvements to the City-owned parking lot, are provided for station planning by the City and do not indicate property acquisition or impacts by the Project. However, there will be temporary impacts to several City-owned park lands during construction as identified in Table 5.14-1 of the Final EIS.

(Responses are continued on next page)

November 6, 2017

DC2RVA Draft Environmental Impact Statement (DEIS) DRAFT

City of Alexandria Question and Comment Matrix

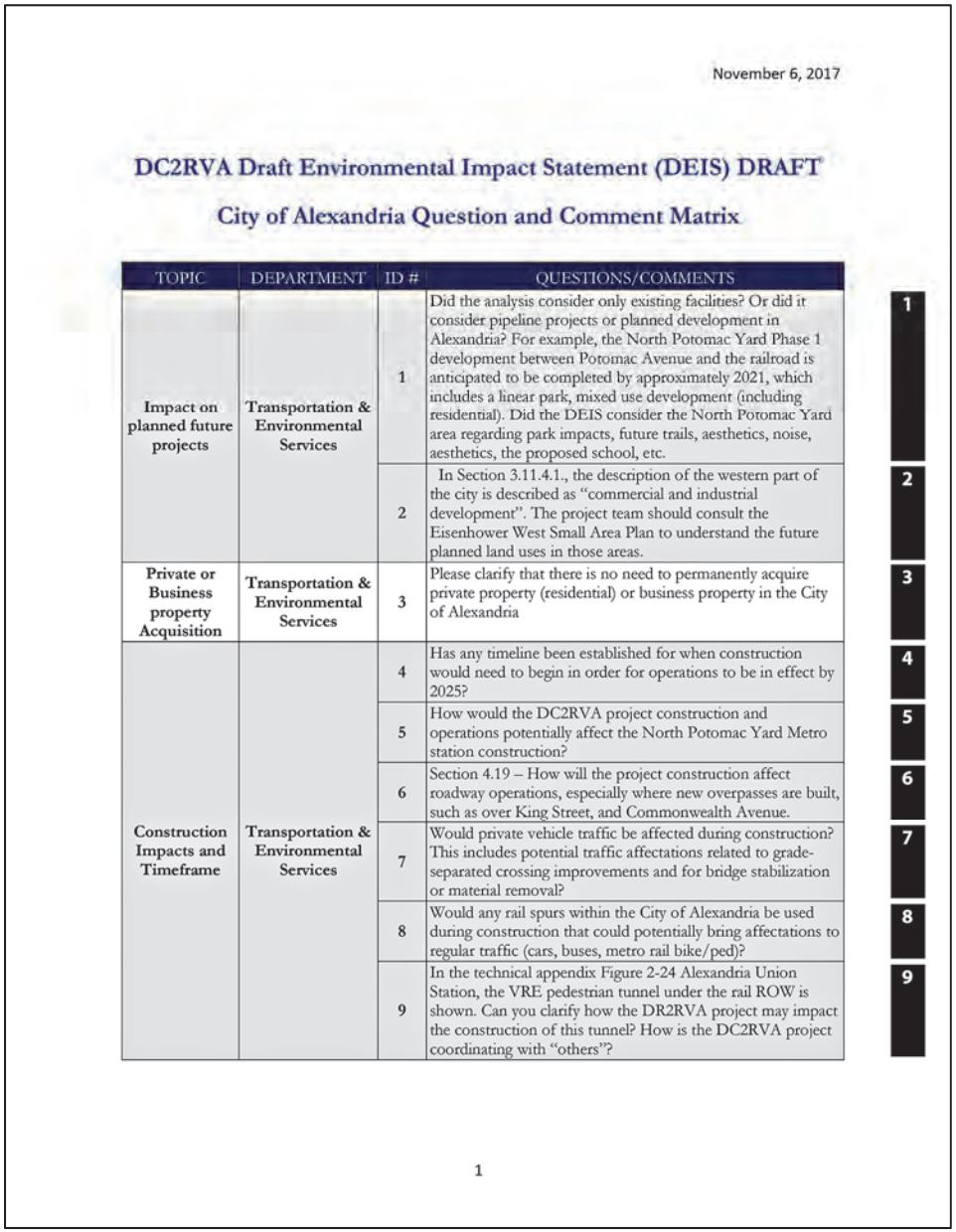
TOPIC	DEPARTMENT	ID #	QUESTIONS/COMMENTS	
Impact on planned future projects	Transportation & Environmental Services	1	Did the analysis consider only existing facilities? Or did it consider pipeline projects or planned development in Alexandria? For example, the North Potomac Yard Phase 1 development between Potomac Avenue and the railroad is anticipated to be completed by approximately 2021, which includes a linear park, mixed use development (including residential). Did the DEIS consider the North Potomac Yard area regarding park impacts, future trails, aesthetics, noise, aesthetics, the proposed school, etc.	1
		2	In Section 3.11.4.1., the description of the western part of the city is described as "commercial and industrial development". The project team should consult the Eisenhower West Small Area Plan to understand the future planned land uses in those areas.	2
Private or Business property Acquisition	Transportation & Environmental Services	3	Please clarify that there is no need to permanently acquire private property (residential) or business property in the City of Alexandria	3
Construction Impacts and Timeframe	Transportation & Environmental Services	4	Has any timeline been established for when construction would need to begin in order for operations to be in effect by 2025?	4
		5	How would the DC2RVA project construction and operations potentially affect the North Potomac Yard Metro station construction?	5
		6	Section 4.19 – How will the project construction affect roadway operations, especially where new overpasses are built, such as over King Street, and Commonwealth Avenue.	6
		7	Would private vehicle traffic be affected during construction? This includes potential traffic affectations related to grade-separated crossing improvements and for bridge stabilization or material removal?	7
		8	Would any rail spurs within the City of Alexandria be used during construction that could potentially bring affectations to regular traffic (cars, buses, metro rail bike/ped)?	8
		9	In the technical appendix Figure 2-24 Alexandria Union Station, the VRE pedestrian tunnel under the rail ROW is shown. Can you clarify how the DR2RVA project may impact the construction of this tunnel? How is the DC2RVA project coordinating with "others"?	9

1

CITY OF ALEXANDRIA (continued)

4. A new chapter (Chapter 7) has been added to the Final EIS since the publication of the Draft EIS, to clarify the next steps of the Project, including funding, final design, and construction. As described more fully in that chapter, the DC2RVA Project is not funded beyond the NEPA Tier II EIS study, with the exception of two segments of new main line track funded through the Atlantic Gateway project. The remainder of the DC2RVA Project will be designed/built in increments as funding becomes available and improvements are scheduled.
5. The DC2RVA Project construction and operations will occur within the CSXT right-of-way/corridor in the vicinity of the North Potomac Yard Metrorail station. With the exception of the Atlantic Gateway suite of projects (see response to DRPT-numbered statement #4), construction scheduling will be performed as part of the final design once funding becomes available and incremental improvements are scheduled. The DC2RVA Project will add a fourth track on the easternmost side of the CSX right-of-way/corridor (i.e., west of all existing tracks and the proposed North Potomac Yard Metrorail station). DRPT does not anticipate that construction of or operations on the new fourth track will impact the North Potomac Yard Metro Station construction or operations. This includes the information provided in the FTA Potomac Yard Metrorail Station EIS and ROD from 2016 (https://www.alexandriava.gov/potomacyard/default.aspx?id=101657), which define the station preferred alternative to be located east of the CSXT right-of-way. The initial plans for Potomac Yard Metro Station called for two entrances, north and south, with each entrance linked to a separate pedestrian bridge over the rail corridor. Due to cost concerns, the south entrance and pedestrian bridge was dropped from station plans in the September 2018 construction plans. Since then, with the announcement in November 2018 of Amazon's new headquarters facility to be located in Arlington, the City of Alexandria has announced the south entrance and pedestrian bridge will again be part of the Potomac Yard Metro Station. There will be two pedestrian bridges crossing the CSXT corridor to a roadway and station access location west of the CSXT right-of-way.

(Responses are continued on next page)



November 6, 2017

DC2RVA Draft Environmental Impact Statement (DEIS) DRAFT

City of Alexandria Question and Comment Matrix

TOPIC	DEPARTMENT	ID #	QUESTIONS/COMMENTS	
Impact on planned future projects	Transportation & Environmental Services	1	Did the analysis consider only existing facilities? Or did it consider pipeline projects or planned development in Alexandria? For example, the North Potomac Yard Phase 1 development between Potomac Avenue and the railroad is anticipated to be completed by approximately 2021, which includes a linear park, mixed use development (including residential). Did the DEIS consider the North Potomac Yard area regarding park impacts, future trails, aesthetics, noise, aesthetics, the proposed school, etc.	1
		2	In Section 3.11.4.1., the description of the western part of the city is described as "commercial and industrial development". The project team should consult the Eisenhower West Small Area Plan to understand the future planned land uses in those areas.	2
Private or Business property Acquisition	Transportation & Environmental Services	3	Please clarify that there is no need to permanently acquire private property (residential) or business property in the City of Alexandria	3
Construction Impacts and Timeframe	Transportation & Environmental Services	4	Has any timeline been established for when construction would need to begin in order for operations to be in effect by 2025?	4
		5	How would the DC2RVA project construction and operations potentially affect the North Potomac Yard Metro station construction?	5
		6	Section 4.19 – How will the project construction affect roadway operations, especially where new overpasses are built, such as over King Street, and Commonwealth Avenue.	6
		7	Would private vehicle traffic be affected during construction? This includes potential traffic affectations related to grade-separated crossing improvements and for bridge stabilization or material removal?	7
		8	Would any rail spurs within the City of Alexandria be used during construction that could potentially bring affectations to regular traffic (cars, buses, metro rail bike/ped)?	8
		9	In the technical appendix Figure 2-24 Alexandria Union Station, the VRE pedestrian tunnel under the rail ROW is shown. Can you clarify how the DR2RVA project may impact the construction of this tunnel? How is the DC2RVA project coordinating with "others"?	9

1

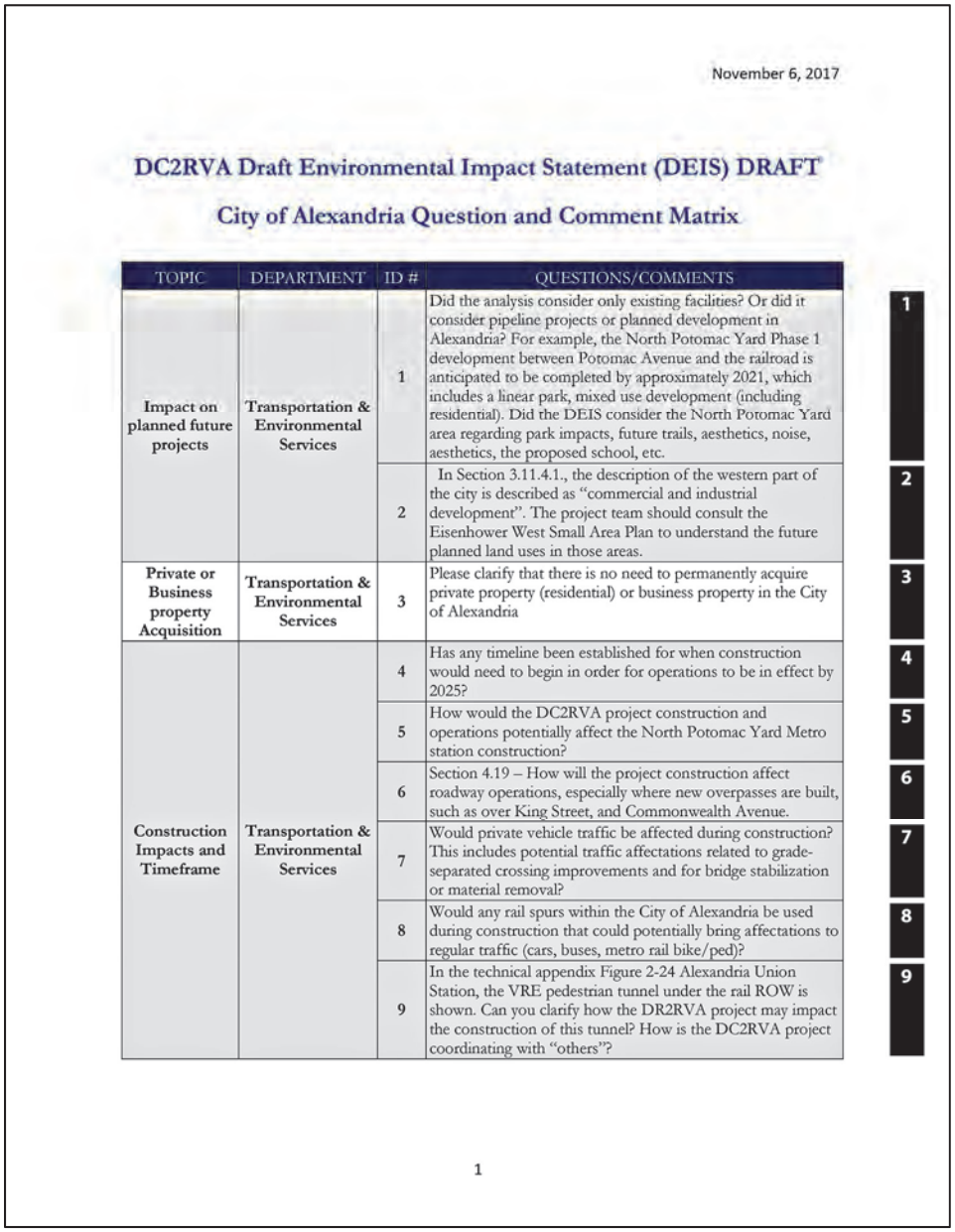
CITY OF ALEXANDRIA (continued)

6. There are no new overpasses proposed by the DC2RVA Project within the City of Alexandria. The existing King Street and Commonwealth Avenue underpass bridges are of sufficient width to construct the proposed fourth track on the existing structures. Final design, after funding is secured and incremental improvements are scheduled, will include detailed survey of existing railroad bridge structures, including those spanning King Street and Commonwealth Avenue. Should additional improvements be identified at that time, DRPT will coordinate with the City of Alexandria for the preparation of a traffic management plan.

7. Temporary minor impacts to private vehicle traffic during construction may result from material deliveries to or removal of materials from the construction areas or from structural rehabilitation of underpasses or overpasses; there are no new grade-separations proposed in the City as part of the Project. Detailed traffic control plans to minimize construction impacts will be developed as part of the final design, once funding becomes available and incremental improvements are scheduled; refer to DRPT-numbered statement #4 for construction / funding details.

8. The DC2RVA Project does not plan to construct or make use of any rail spurs within the City of Alexandria. Track designs, including the use of temporary or permanent rail spurs within the City of Alexandria, will be developed as part of the final design, after funding becomes available and incremental improvements are scheduled.

(Responses are continued on next page)



November 6, 2017

DC2RVA Draft Environmental Impact Statement (DEIS) DRAFT

City of Alexandria Question and Comment Matrix

TOPIC	DEPARTMENT	ID #	QUESTIONS/COMMENTS	
Impact on planned future projects	Transportation & Environmental Services	1	Did the analysis consider only existing facilities? Or did it consider pipeline projects or planned development in Alexandria? For example, the North Potomac Yard Phase 1 development between Potomac Avenue and the railroad is anticipated to be completed by approximately 2021, which includes a linear park, mixed use development (including residential). Did the DEIS consider the North Potomac Yard area regarding park impacts, future trails, aesthetics, noise, aesthetics, the proposed school, etc.	1
		2	In Section 3.11.4.1., the description of the western part of the city is described as "commercial and industrial development". The project team should consult the Eisenhower West Small Area Plan to understand the future planned land uses in those areas.	2
Private or Business property Acquisition	Transportation & Environmental Services	3	Please clarify that there is no need to permanently acquire private property (residential) or business property in the City of Alexandria	3
Construction Impacts and Timeframe	Transportation & Environmental Services	4	Has any timeline been established for when construction would need to begin in order for operations to be in effect by 2025?	4
		5	How would the DC2RVA project construction and operations potentially affect the North Potomac Yard Metro station construction?	5
		6	Section 4.19 – How will the project construction affect roadway operations, especially where new overpasses are built, such as over King Street, and Commonwealth Avenue.	6
		7	Would private vehicle traffic be affected during construction? This includes potential traffic affectations related to grade-separated crossing improvements and for bridge stabilization or material removal?	7
		8	Would any rail spurs within the City of Alexandria be used during construction that could potentially bring affectations to regular traffic (cars, buses, metro rail bike/ped)?	8
		9	In the technical appendix Figure 2-24 Alexandria Union Station, the VRE pedestrian tunnel under the rail ROW is shown. Can you clarify how the DR2RVA project may impact the construction of this tunnel? How is the DC2RVA project coordinating with "others"?	9

1

CITY OF ALEXANDRIA (continued)

9. and 10. In the vicinity of Alexandria Union Station, the DC2RVA Project proposes to add a fourth track within the existing CSXT right-of-way where a track previously existed. DRPT has coordinated closely with VRE throughout the development of the Draft EIS. The design and timing of the potential pedestrian tunnel project are independent of and separate from the DC2RVA Project, and temporary construction impacts will vary based on which project (DC2RVA or the referenced VRE pedestrian tunnel) is constructed first. Currently, DRPT anticipates that the proposed VRE pedestrian tunnel will be in place before DRPT adds the fourth track as part of the Atlantic Gateway project. Under this scenario, DRPT does not anticipate any impacts to the VRE pedestrian tunnel. However, DRPT recognizes that continued coordination with VRE and the City or Alexandria is critical to minimize the potential for the construction of the fourth track to impact the VRE improvements. Therefore, DRPT remains committed to working with VRE, and the City, during final design and construction of the Project (refer to DRPT-numbered statement #4 for details on Project funding / scheduling).

November 6, 2017

		10	With the proposed track realignment and 4th line at King Street station, how does this affect the design and timing of the pedestrian tunnel project?	10
Projected Population	Transportation & Environmental Services	11	What was the data utilized to project future population growth? For example, Ch. 3 - Table 3.11- 2 Shows Alexandria's population declining through 2040. This seems contradictory to current trends, and potential population increases due to additional growth areas the City is planning for. [	11
Noise from train operations and locomotive horns	Transportation & Environmental Services	12	Ch. 4 - Section 4.7.1.5 (Environmental Consequences – Noise Mitigation Measures) states that noise mitigation has not been specifically recommended, due to prematurity of a recommended preferred alternative. Did the air pollution, noise and vibration analysis take into consideration the [potential impacts on the] planned mixed-use development and linear park within North Potomac Yard, and specifically the Phase 1 development between Potomac Avenue and the railroad? (See comment 1)	12
		13	Have the noise/vibration receptors been identified inside the City of Alexandria? Please clarify the locations within the City that were used in the DEIS noise and vibration analysis?	13
		14	What is the process for determining the need and implementation of a sound barrier and what is the method for determining effectiveness of a sound mitigation (apparently, available technology may not be effective against train whistles, etc…)	14
Vibrations	Transportation & Environmental Services	15	Ch. 4. Section 4.7.2.4. notes that Alexandria Union Station is within all vibration impact, however states that the impacts are not significant/that the building is not vibration sensitive. Can the project team consider further studying the impacts of construction and operation vibrations on Alexandria Union Station as it is a Historic Building? What is the vibration impact category the station is subject to?	15
		16	Ch. 4 - Table 4.7-7 (Environmental Consequences - Vibration) shows 15 receptors to have vibration impacts in Northern Virginia, but doesn't specify where they are located (Other than Union Station). Also, please clarify the process for identifying and implementing mitigation.	16
		17	What are the locations of sensible noise receptors for alternative 2A? Ch. 4 Sec 4.7.2-4 only lists Alexandria Union Station as one of the 15 receptors.	17
Road network changes, Traffic impacts and Rail Corridor Operations	Transportation & Environmental Services	18	While the project is under construction, and tracks are being aligned, how will the corridor maintain the demand for existing operations of all users, including Amtrak, VRE and freight?	18
		19	Are there any changes to the grade separated crossings in Alexandria, particularly King Street? What are the impacts of the construction of the 4th rail on the King Street, and Commonwealth Ave Bridges?	19

2

CITY OF ALEXANDRIA (continued)

(Response to comment 10 on previous page)

11. DRPT used the state-approved Weldon Cooper Center population projection data for the Draft EIS population evaluations, as available at that time of analysis, which were later updated in June 2017. DRPT has reviewed the updated 2017 Weldon Cooper Center projections, which show greater growth in the City of Alexandria between 2015 and 2045 as compared to the values available at the time of the Draft EIS. While the updated data is consistent with the City's assertion, it does not affect any conclusions drawn in the Draft EIS regarding population increases for the overall study area.

12. DRPT evaluated noise and vibration effects from the proposed intercity passenger train using land use data that was publicly available and reasonably obtainable at the time the analyses were performed. This included digital aerial photographs showing the rail corridor and surrounding land uses near the planned North Potomac Yard. The noise and vibration contour figures in Appendix P of the Draft EIS show where Project-related noise and vibration impacts (as defined by FRA) are projected to occur including the area near the North Potomac Yard. Category Severe 1 Noise Impacts, as defined by FRA, may be experienced within 120 to 140 feet of the new main track along the corridor, depending on site specific conditions and land use; refer to the noise and vibration contours in Appendix P of the Draft EIS for additional information. There are no changes to the vibration impact contours or noise impact contours since the publication of the Draft EIS, with the exception of two areas for noise only; these two areas are detailed in Final EIS Section 5.7 and updated maps are provided in Appendix M of the Final EIS. Additionally, Section 5.20 of the Final EIS discusses the potential indirect and cumulative effects of planned developments, including the Potomac Yard Metrorail Station and other major projects included in the City of Alexandria's Master Plan.

    DRPT considered local Project-related air quality effects in the Draft EIS. Any increases in pollutant emissions related to trains operating along the DC2RVA corridor at this and other locations are expected to be minor. Additionally, construction activities can result in short-term increases in fugitive dust and equipment-related particulate emissions.

(Responses are continued on next page)

November 6, 2017

		10	With the proposed track realignment and 4th line at King Street station, how does this affect the design and timing of the pedestrian tunnel project?	10
Projected Population	Transportation & Environmental Services	11	What was the data utilized to project future population growth? For example, Ch. 3 - Table 3.11- 2 Shows Alexandria's population declining through 2040. This seems contradictory to current trends, and potential population increases due to additional growth areas the City is planning for. [	11
Noise from train operations and locomotive horns	Transportation & Environmental Services	12	Ch. 4 - Section 4.7.1.5 (Environmental Consequences – Noise Mitigation Measures) states that noise mitigation has not been specifically recommended, due to prematurity of a recommended preferred alternative. Did the air pollution, noise and vibration analysis take into consideration the [potential impacts on the] planned mixed-use development and linear park within North Potomac Yard, and specifically the Phase 1 development between Potomac Avenue and the railroad? (See comment 1)	12
		13	Have the noise/vibration receptors been identified inside the City of Alexandria? Please clarify the locations within the City that were used in the DEIS noise and vibration analysis?	13
		14	What is the process for determining the need and implementation of a sound barrier and what is the method for determining effectiveness of a sound mitigation (apparently, available technology may not be effective against train whistles, etc…)	14
Vibrations	Transportation & Environmental Services	15	Ch. 4. Section 4.7.2.4. notes that Alexandria Union Station is within all vibration impact, however states that the impacts are not significant/that the building is not vibration sensitive. Can the project team consider further studying the impacts of construction and operation vibrations on Alexandria Union Station as it is a Historic Building? What is the vibration impact category the station is subject to?	15
		16	Ch. 4 - Table 4.7-7 (Environmental Consequences - Vibration) shows 15 receptors to have vibration impacts in Northern Virginia, but doesn't specify where they are located (Other than Union Station). Also, please clarify the process for identifying and implementing mitigation.	16
		17	What are the locations of sensible noise receptors for alternative 2A? Ch. 4 Sec 4.7.2-4 only lists Alexandria Union Station as one of the 15 receptors.	17
Road network changes, Traffic impacts and Rail Corridor Operations	Transportation & Environmental Services	18	While the project is under construction, and tracks are being aligned, how will the corridor maintain the demand for existing operations of all users, including Amtrak, VRE and freight?	18
		19	Are there any changes to the grade separated crossings in Alexandria, particularly King Street? What are the impacts of the construction of the 4th rail on the King Street, and Commonwealth Ave Bridges?	19

2

CITY OF ALEXANDRIA (continued)

The potential air quality effects from construction activity will be short-term, occurring only while construction work is in progress and local conditions are appropriate, and appropriate Best Management Practices will be identified during construction to minimize air quality effects.

13. DRPT evaluated noise and vibration effects from the proposed intercity passenger trains using land use data that was publicly available and reasonably obtainable at the time the analyses were performed. This included digital aerial photographs and land use data for City of Alexandria. The noise and vibration contour figures in Appendix P of the Draft EIS show where Project-related noise and vibration impacts (as defined by FRA) are projected to occur, including in the City of Alexandria. Category Severe 1 Noise Impacts, as defined by FRA, may be experienced within 120 to 140 feet of the new main track along the corridor, depending on site specific conditions and land use; refer to the noise and vibration contours in Appendix P of the Draft EIS for additional information. There are no changes to the noise impact contours since the publication of the Draft EIS, with the exception of two areas; these two areas are detailed in Final EIS Section 5.7 and updated maps are provided in Appendix M of the Final EIS.
14. FRA noise impact assessment guidelines include the methodology for determining if the proposed intercity passenger trains are projected to cause moderate or severe noise impacts (as defined by FRA). During the final design phase of the Project, which will occur after funding becomes available and incremental improvements are scheduled, the noise assessment will be revised to determine where severe noise impacts are projected to occur. Noise mitigation measures will be evaluated and selected at that time, as required. While sound barrier walls are a common mitigation measure for major highway projects, they are not typical for intercity passenger rail projects and are not required by FRA or FTA. Further, CSXT policy generally does not allow sound barrier walls within their right-of-way. Therefore, use of sound barrier walls as future mitigation for DC2RVA train noise would require additional property impacts.

(Responses are continued on next page)

November 6, 2017

		10	With the proposed track realignment and 4th line at King Street station, how does this affect the design and timing of the pedestrian tunnel project?	10
Projected Population	Transportation & Environmental Services	11	What was the data utilized to project future population growth? For example, Ch. 3 - Table 3.11- 2 Shows Alexandria's population declining through 2040. This seems contradictory to current trends, and potential population increases due to additional growth areas the City is planning for. [	11
Noise from train operations and locomotive horns	Transportation & Environmental Services	12	Ch. 4 - Section 4.7.1.5 (Environmental Consequences – Noise Mitigation Measures) states that noise mitigation has not been specifically recommended, due to prematurity of a recommended preferred alternative. Did the air pollution, noise and vibration analysis take into consideration the [potential impacts on the] planned mixed-use development and linear park within North Potomac Yard, and specifically the Phase 1 development between Potomac Avenue and the railroad? (See comment 1)	12
		13	Have the noise/vibration receptors been identified inside the City of Alexandria? Please clarify the locations within the City that were used in the DEIS noise and vibration analysis?	13
		14	What is the process for determining the need and implementation of a sound barrier and what is the method for determining effectiveness of a sound mitigation (apparently, available technology may not be effective against train whistles, etc…)	14
Vibrations	Transportation & Environmental Services	15	Ch. 4. Section 4.7.2.4. notes that Alexandria Union Station is within all vibration impact, however states that the impacts are not significant/that the building is not vibration sensitive. Can the project team consider further studying the impacts of construction and operation vibrations on Alexandria Union Station as it is a Historic Building? What is the vibration impact category the station is subject to?	15
		16	Ch. 4 - Table 4.7-7 (Environmental Consequences - Vibration) shows 15 receptors to have vibration impacts in Northern Virginia, but doesn't specify where they are located (Other than Union Station). Also, please clarify the process for identifying and implementing mitigation.	16
		17	What are the locations of sensible noise receptors for alternative 2A? Ch. 4 Sec 4.7.2-4 only lists Alexandria Union Station as one of the 15 receptors.	17
Road network changes, Traffic impacts and Rail Corridor Operations	Transportation & Environmental Services	18	While the project is under construction, and tracks are being aligned, how will the corridor maintain the demand for existing operations of all users, including Amtrak, VRE and freight?	18
		19	Are there any changes to the grade separated crossings in Alexandria, particularly King Street? What are the impacts of the construction of the 4th rail on the King Street, and Commonwealth Ave Bridges?	19

2

CITY OF ALEXANDRIA (continued)

It is important to note that freight train noise, which accounts for more noise than passenger trains, will increase independently of the DC2RVA Project.

15. The Alexandria Union Station is an active, functioning train station that was designed and constructed to withstand exposure to train-induced ground-borne vibration on a daily basis. Therefore, it is not considered vibration-sensitive. While the building may have historic characteristics and designation, train-induced ground-borne vibration is a common phenomenon at the station by virtue of its nature as an active train station. It is important to note that train frequency of VRE commuter trains and CSXT freight trains (which account for more noise and vibration than passenger trains) through Alexandria Union Station will increase independently of the DC2RVA Project.

16. Appendix P of the Draft EIS includes noise and vibration contour figures that identify where noise and vibration impacts (as defined by FRA) are projected to occur as a result of the proposed intercity passenger trains. There are no changes to the vibration impact contours or noise impact contours since the publication of the Draft EIS, with the exception of two areas for noise only; these two areas are detailed in Final EIS Section 5.7 and updated maps are provided in Appendix M of the Final EIS.

    Mitigation measures will be evaluated in more detail during the final design phase of the Project, which will occur after funding becomes available and incremental improvements are scheduled. FRA noise and vibration impact assessment guidelines include guidelines for evaluating and implementing mitigation measures. Final mitigation decisions will be determined by FRA, with recommendations for permitting, as required, from Federal, state, and local agencies.

(Responses are continued on next page)

November 6, 2017

		10	With the proposed track realignment and 4th line at King Street station, how does this affect the design and timing of the pedestrian tunnel project?	10
Projected Population	Transportation & Environmental Services	11	What was the data utilized to project future population growth? For example, Ch. 3 - Table 3.11- 2 Shows Alexandria's population declining through 2040. This seems contradictory to current trends, and potential population increases due to additional growth areas the City is planning for. [	11
Noise from train operations and locomotive horns	Transportation & Environmental Services	12	Ch. 4 - Section 4.7.1.5 (Environmental Consequences – Noise Mitigation Measures) states that noise mitigation has not been specifically recommended, due to prematurity of a recommended preferred alternative. Did the air pollution, noise and vibration analysis take into consideration the [potential impacts on the] planned mixed-use development and linear park within North Potomac Yard, and specifically the Phase 1 development between Potomac Avenue and the railroad? (See comment 1)	12
		13	Have the noise/vibration receptors been identified inside the City of Alexandria? Please clarify the locations within the City that were used in the DEIS noise and vibration analysis?	13
		14	What is the process for determining the need and implementation of a sound barrier and what is the method for determining effectiveness of a sound mitigation (apparently, available technology may not be effective against train whistles, etc…)	14
Vibrations	Transportation & Environmental Services	15	Ch. 4. Section 4.7.2.4. notes that Alexandria Union Station is within all vibration impact, however states that the impacts are not significant/that the building is not vibration sensitive. Can the project team consider further studying the impacts of construction and operation vibrations on Alexandria Union Station as it is a Historic Building? What is the vibration impact category the station is subject to?	15
		16	Ch. 4 - Table 4.7-7 (Environmental Consequences - Vibration) shows 15 receptors to have vibration impacts in Northern Virginia, but doesn't specify where they are located (Other than Union Station). Also, please clarify the process for identifying and implementing mitigation.	16
		17	What are the locations of sensible noise receptors for alternative 2A? Ch. 4 Sec 4.7.2-4 only lists Alexandria Union Station as one of the 15 receptors.	17
Road network changes, Traffic impacts and Rail Corridor Operations	Transportation & Environmental Services	18	While the project is under construction, and tracks are being aligned, how will the corridor maintain the demand for existing operations of all users, including Amtrak, VRE and freight?	18
		19	Are there any changes to the grade separated crossings in Alexandria, particularly King Street? What are the impacts of the construction of the 4th rail on the King Street, and Commonwealth Ave Bridges?	19

2

CITY OF ALEXANDRIA (continued)

17. Refer to the noise and vibration contour figures in Appendix P of the Draft EIS for the locations where noise and vibration impacts are projected to occur as a result of the build alternative for the proposed intercity passenger trains. There are no changes to the vibration impact contours or noise impact contours since the publication of the Draft EIS, with the exception of two areas for noise only; these two areas are detailed in Final EIS Section 5.7 and updated maps are provided in Appendix M of the Final EIS.

18. Existing operations for Amtrak, VRE, and freight will be maintained during construction to the extent practicable. DRPT anticipates that track outages would be limited, to the maximum extent possible, to periods when CSXT, Amtrak and VRE have a reduced number of trains operating. Coordination prior and during construction with CSXT, Amtrak and VRE will identify day, time of day, and length of time that a track outage may occur.

19. There are no proposed changes to the existing King Street or Commonwealth Avenue rail bridges. Structural assessments and construction impacts will be identified as part of the final design after funding becomes available and incremental improvements are scheduled; refer to DRPT-numbered statement #4 for construction / funding details. Final design, after funding is secured and incremental improvements are scheduled, will include detailed survey of existing railroad bridge structures, including those spanning King Street and Commonwealth Avenue. Should additional improvements be identified at that time, DRPT will coordinate with the City of Alexandria for the preparation of a traffic management plan during final design.

November 6, 2017

		20	Ch. 4 - Section 4.15.1.3 – says that for each alternative, the project ridership equates to 2,000 new daily vehicle trips at each station (for each single station alternative), or combination of stations (for each two-station alternative). This is unclear – Please clarify what this means. In addition, 2,000 additional daily trips does not seem to equate with the low annual ridership (25,000) increase at Alexandria station.	20
		21	Table 4.15-1 (Environmental Consequences – Ridership of DC2RVA) - Under No Build, it's projected that annual ridership will increase from 174,238 under existing conditions, to a future ridership of 208,496. Under the Build scenarios, the maximum projected ridership would be 233,602 (or an increase of 25,000 over the No Build). This seems low given that there will be an increase of 9 trips per day. Please clarify how these ridership projections were developed.	21
		22	What percentage of high-speed rail trips going into Alexandria Station come from private car, vs. transit, vs. ped/ bike? In other words, what is the mode split assumption of the increased demand for rail?	22
		23	At the bridge over Van Dorn St. at the City of Alexandria and Fairfax Co. line, please clarify it there are any proposed improvements, and will there be any impacts on the bridge or surrounding areas?	23
	Transportation & Environmental Services	24	Will there be any potential impact during construction, or upon project completion to the existing pedestrian tunnel that connects Mill Road to Witter Field? A fourth line is proposed in this location.	24
		25	Ch. 4 - Section 4.14 (Environmental Consequences – Parklands, Recreational Areas, and Refuges) of DEIS notes that the only impact is a 0.04 acre impact to the dog park at Carlyle. However, Sheet 4 of 89 in the mapbook D-1 shows a temporary limit of disturbance within the future North Potomac Yard park to be completed as part of the North Potomac Yard Small Area Plan (Phase 1) development. Please clarify if or how the permanent limit of disturbance will impact the future North Potomac Yard park.	25
		26	Sheet 6 of 89 in the mapbook D-1 appears to show a temporary disturbance to the community park (where tennis courts located) in Potomac Greens. Please clarify the impact that is anticipated here, especially to the temporary or permanent use and design of the park.	26
Parkland Resources		27	Would the permanent affectation in Dog Run Park @ Carlyle require removing the trees that are currently there?	27
	Recreation, Parks and Cultural Activities	28	Update Figure 3.14-1 to show the undocumented public/private with public access parks. (See comments below.)	28
		29	Update Figure 3.14-1 to show the correct location/boundaries of Braddock Park/Lenny Harris Memorial Field at Braddock Park.	29

3

CITY OF ALEXANDRIA (continued)

20. The referenced text is in a section of the Draft EIS that is a summary of Table 4.15-3, the first column of which lists the station alternatives in Richmond; these alternatives drive the differences in ridership projections for Build conditions throughout the DC2RVA corridor. The referenced text "for each alternative…" is intended to indicate daily vehicle trips at each of the Richmond station alternatives (not each Build Alternative throughout the corridor), and is not intended to be a reflection of ridership at the Alexandria station; this text is clarified in Section 5.15.1.3 of the Final EIS, as well as in the errata table for the Draft EIS, which is Appendix A of the Final EIS. As shown in Table 4.15-1 of the Draft EIS, the annual ridership at Alexandria Station is anticipated to increase 11% in 2025, as compared to the No Build. Daily vehicle trips are a separate estimate from annual ridership and are not a one-to-one correlation (refer to DRPT-numbered statement #22 for mode-split assumptions at Alexandria Station).

21. Table 4.15-1 of the Draft EIS provides information on the total annual boardings and alightings at Alexandria Station for each of the alternatives. This comment cites the highest increase in boardings/alightings, resulting with the implementation of Alternative 6A in Richmond; the increase in boardings/alightings at Alexandria Station from the 2025 No-Build to 2025 Alternative 6A is anticipated to be 25,106 annually (a 12 percent annual increase). While this averages to be an increase of just under 69 boardings/alightings per day across 365 days per year, it is important to note that the ridership is not consistent across all days. However, Alternative 6F: Full Service (Staples Mill Road Station and Main Street Station) was selected as the Preferred Alternative for the Richmond Area (refer to Final EIS Section 4.3.6 for details); from this same table, the increase in boardings/alightings at Alexandria Station from the 2025 No-Build to 2025 Alternative 6F is anticipated to be 22,400 annually (an 11 percent annual increase).

(Responses are continued on next page)

November 6, 2017

		20	Ch. 4 - Section 4.15.1.3 – says that for each alternative, the project ridership equates to 2,000 new daily vehicle trips at each station (for each single station alternative), or combination of stations (for each two-station alternative). This is unclear – Please clarify what this means. In addition, 2,000 additional daily trips does not seem to equate with the low annual ridership (25,000) increase at Alexandria station.	20
		21	Table 4.15-1 (Environmental Consequences – Ridership of DC2RVA) - Under No Build, it's projected that annual ridership will increase from 174,238 under existing conditions, to a future ridership of 208,496. Under the Build scenarios, the maximum projected ridership would be 233,602 (or an increase of 25,000 over the No Build). This seems low given that there will be an increase of 9 trips per day. Please clarify how these ridership projections were developed.	21
		22	What percentage of high-speed rail trips going into Alexandria Station come from private car, vs. transit, vs. ped/ bike? In other words, what is the mode split assumption of the increased demand for rail?	22
		23	At the bridge over Van Dorn St. at the City of Alexandria and Fairfax Co. line, please clarify it there are any proposed improvements, and will there be any impacts on the bridge or surrounding areas?	23
	Transportation & Environmental Services	24	Will there be any potential impact during construction, or upon project completion to the existing pedestrian tunnel that connects Mill Road to Witter Field? A fourth line is proposed in this location.	24
		25	Ch. 4 - Section 4.14 (Environmental Consequences – Parklands, Recreational Areas, and Refuges) of DEIS notes that the only impact is a 0.04 acre impact to the dog park at Carlyle. However, Sheet 4 of 89 in the mapbook D-1 shows a temporary limit of disturbance within the future North Potomac Yard park to be completed as part of the North Potomac Yard Small Area Plan (Phase 1) development. Please clarify if or how the permanent limit of disturbance will impact the future North Potomac Yard park.	25
		26	Sheet 6 of 89 in the mapbook D-1 appears to show a temporary disturbance to the community park (where tennis courts located) in Potomac Greens. Please clarify the impact that is anticipated here, especially to the temporary or permanent use and design of the park.	26
Parkland Resources		27	Would the permanent affectation in Dog Run Park @ Carlyle require removing the trees that are currently there?	27
	Recreation, Parks and Cultural Activities	28	Update Figure 3.14-1 to show the undocumented public/private with public access parks. (See comments below.)	28
		29	Update Figure 3.14-1 to show the correct location/boundaries of Braddock Park/Lenny Harris Memorial Field at Braddock Park.	29

3

CITY OF ALEXANDRIA (continued)

Reported ridership at the Alexandria Station includes customers boarding all trains serving that station; not just those traveling in the DC2RVA corridor. This reporting is consistent with Amtrak's publicly-available ridership statistics and avoids disclosure of proprietary station-to-station information. These total numbers include travelers to destinations not affected by the Project including Florida, Charlottesville, Atlanta, New Orleans, and Chicago. Since service to these other destinations are largely unaffected by the Project and are a significant share of the existing ridership, the change in total ridership is less sensitive than corridor-specific ridership. The Project forecasts were reviewed by Amtrak and model parameters were adjusted to match Amtrak's own experience with the effect of service improvements on changes in ridership.

22. Mode split assumptions are included in Table 4-6 of the Transportation Technical Report (Appendix S) of the Draft EIS. Stations in the DC2RVA corridor were categorized as either suburban or urban based on the adjacent land uses; Alexandria Station was categorized as an urban station. Mode split assumptions for arriving and departing passengers at urban stations are as follows (Mode / Mode Split, as a percentage of total person-trips): Drive and Park (22%); Kiss and Ride (20%); Taxi / Car Service (29%); Public Transit (12%); Walk (15%); and Bicycles / Other (2%).

23. The DC2RVA Project proposes no improvements to the three existing tracks at this location and has no impacts to the bridge or the area immediately surrounding the bridge.

24. Construction and operation of a fourth track over the Telegraph Road Tunnel is not expected to have any potential impacts to the tunnel.

25. Based on updated Potomac Yard Park boundaries that DRPT received from the City of Alexandria, the Preferred Alternative 2A will have temporary impacts to the Potomac Yard Park, as reported in Section 5.14 of the Final EIS. These temporary impacts have been minimized to the extent possible at the conceptual level of design.

(Responses are continued on next page)

November 6, 2017

		20	Ch. 4 - Section 4.15.1.3 – says that for each alternative, the project ridership equates to 2,000 new daily vehicle trips at each station (for each single station alternative), or combination of stations (for each two-station alternative). This is unclear – Please clarify what this means. In addition, 2,000 additional daily trips does not seem to equate with the low annual ridership (25,000) increase at Alexandria station.	20
		21	Table 4.15-1 (Environmental Consequences – Ridership of DC2RVA) - Under No Build, it's projected that annual ridership will increase from 174,238 under existing conditions, to a future ridership of 208,496. Under the Build scenarios, the maximum projected ridership would be 233,602 (or an increase of 25,000 over the No Build). This seems low given that there will be an increase of 9 trips per day. Please clarify how these ridership projections were developed.	21
		22	What percentage of high-speed rail trips going into Alexandria Station come from private car, vs. transit, vs. ped/ bike? In other words, what is the mode split assumption of the increased demand for rail?	22
		23	At the bridge over Van Dorn St. at the City of Alexandria and Fairfax Co. line, please clarify it there are any proposed improvements, and will there be any impacts on the bridge or surrounding areas?	23
	Transportation & Environmental Services	24	Will there be any potential impact during construction, or upon project completion to the existing pedestrian tunnel that connects Mill Road to Witter Field? A fourth line is proposed in this location.	24
		25	Ch. 4 - Section 4.14 (Environmental Consequences – Parklands, Recreational Areas, and Refuges) of DEIS notes that the only impact is a 0.04 acre impact to the dog park at Carlyle. However, Sheet 4 of 89 in the mapbook D-1 shows a temporary limit of disturbance within the future North Potomac Yard park to be completed as part of the North Potomac Yard Small Area Plan (Phase 1) development. Please clarify if or how the permanent limit of disturbance will impact the future North Potomac Yard park.	25
		26	Sheet 6 of 89 in the mapbook D-1 appears to show a temporary disturbance to the community park (where tennis courts located) in Potomac Greens. Please clarify the impact that is anticipated here, especially to the temporary or permanent use and design of the park.	26
Parkland Resources		27	Would the permanent affectation in Dog Run Park @ Carlyle require removing the trees that are currently there?	27
	Recreation, Parks and Cultural Activities	28	Update Figure 3.14-1 to show the undocumented public/private with public access parks. (See comments below.)	28
		29	Update Figure 3.14-1 to show the correct location/boundaries of Braddock Park/Lenny Harris Memorial Field at Braddock Park.	29

3

CITY OF ALEXANDRIA (continued)

26. The temporary right-of-way easement needed during construction is along the edge of the tennis courts and is associated with access, erosion control, and material placement. The referenced tennis courts are privately owned and not a public park. As such, the temporary use and restoration of the area and tennis courts will be coordinated with the private landowner.

27. Impacts of the Preferred Alternative on parks is presented in Table 5.14-1 of the Final EIS. DRPT does not anticipate a permanent impact to Dog Run Park at Carlyle. Trees and other vegetation will need to be removed within the existing railroad right-of-way adjacent to the Park. A temporary construction easement will be necessary where the Park abuts the railroad right-of-way; however, the adjacent dog run area and tennis courts will not be impacted (see Chapter 6 of the Final EIS for details). Within the temporary construction easement, removal of trees will be avoided to the maximum extent feasible, and the area restored at the end of use.

28. through 40. DRPT received updated GIS information from the City of Alexandria. Draft EIS Table 3.14-3 and Figure 3.14-1, as referenced by the City, have been updated accordingly; refer to the errata table for the Draft EIS, which is Appendix A of the Final EIS. DRPT does note that the referenced Four Mile Run / Landbay E was not added to the Final EIS as it is outside the study area (500 feet on either side of the rail corridor).

November 6, 2017

		30	Update Table 3.14 under City of Alexandria parklands to include Four Mile Run/Landbay E as a City owned park.	30
		31	Update Table 3.14 under City of Alexandria parklands to include Rose Square as a private ownership park open to the public with no fee for access.	31
		32	Update Table 3.14 under City of Alexandria parklands to include Potomac Plaza as a private ownership park open to the public with no fee for access.	32
		33	Update Table 3.14 under City of Alexandria parklands to include Neighborhood Park as a private ownership park open to the public with no fee for access.	33
		34	Update Table 3.14 under City of Alexandria parklands to include Custis Avenue Park as a City owned park.	34
		35	Update Table 3.14 under City of Alexandria parklands to include Howell Avenue Park as a City owned park.	35
		36	Update Table 3.14 under City of Alexandria parklands to include Swann Avenue Park as a City owned park.	36
		37	Update Table 3.14. Potomac Yard Park is a public park owned by the City of Alexandria, includes tennis and basketball courts, and is approximately 23.4 acres.	37
		38	Update Table 3.14. Daingerfield Island Park is owned by the National Park Service.	38
		39	Update Table 3.14 to correct the acreage for Eugene Simpson Stadium Park.	39
		40	Update Table 3.14. King Street Gardens Park includes public art.	40
		41	Clarify the location of Traffic Circle Park. This is not referenced the same in the City's systems.	41
		42	Update Table 3.14. Add a 't' to Clermon Natural Area. The correct name is Clermont Natural Park.	42
		43	Update Table 3.14 under City of Alexandria parklands to include Rail Park as a City owned park.	43
		44	Table 3.14-6. Eugene Simpson Stadium Park and Joseph Hensley Park each received Land and Water Conservation Funds.	44
		45	Update Table 3.14-7 to reflect Daingerfield Island as a national park, not owned by the City of Alexandria.	45
		46	Add Four Mile Run Park/Landbay E to Table 3.14-7.	46
		47	Add Custis Avenue Park to Table 3.14-7.	47
		48	Add Howell Avenue Park to Table 3.14-7.	48
		49	Add Swann Avenue Park to Table 3.14-7.	49
		50	Add Potomac Yard Park to Table 3.14-7.	50
		51	Add Rail Park to Table 3.14-7.	51
		52	Replace 'Clermont National Park' with 'Clermont Natural Park' in Table 3.14-7.	52
		53	Under Environmental Consequences, page 4-222, are there any impacts to public parks not identified in Chapter 3?	53

4

CITY OF ALEXANDRIA (continued)

(Response to comments 30 to 40 on previous page)

41. In the Draft EIS, Traffic Circle Park was shown to be located at the southwest corner of East Rosemont Avenue and Mount Vernon Avenue. However, based on updated GIS information and input from the City of Alexandria, Traffic Circle Park is not considered a public park and Project references to it are removed; refer to the errata table for the Draft EIS, which is Appendix A of the Final EIS.

42. and 43. Draft EIS Table 3.14-3 has been updated as requested by the City; refer to the errata table for the Draft EIS, which is Appendix A of the Final EIS.

44. Draft EIS Table 3.14-6 has been updated to include Eugene Simpson Stadium Park and Joseph Hensley Park as Section 6(f) Resources since they received Land and Water Conservation funds; refer to the errata table for the Draft EIS, which is Appendix A of the Final EIS.

45. The left column in Table 3.14-7 of the Draft EIS indicates where the park is located, not ownership; however, it has been clarified to indicate that Daingerfield Island Park is owned by the National Park Service. Refer to the errata table for the Draft EIS, which is Appendix A of the Final EIS.

46. to 52. Draft EIS Table 3.14-7 has been updated as requested by the City; refer to the errata table for the Draft EIS, which is Appendix A of the Final EIS. DRPT does note that the referenced Four Mile Run / Landbay E was not added to the Final EIS as it is outside the study area (500 feet on either side of the rail corridor).

53. Section 5.14.1 and 5.20.2.2 of the Final EIS have been updated to reflect that: the Project will not require any permanent right-of-way from Dog Run Park at Carlyle; impacts have been reduced to Long Bridge Park; and additional temporary impacts have been identified to Potomac Yard Park, Potomac Yard Landbay N, and Rail Park.

November 6, 2017

		54	Under Environmental Consequences, page 4-231, the report does not correctly identify that the impacts to Dog Run Park at Carlyle include permanent impacts as well as temporary impacts.	54
Section 4(f) Evaluation	Recreation, Parks and Cultural Activities	55	Under 5.4.1 Parks and Recreation Areas, page 5-69, the adjacent dog run area would be impacted by the project. The impacts include both temporary and permanent impacts. How can both temporary and permanent impacts be mitigated?	55
		56	Under 5.5.1 Summary of Preliminary Section 4(f) Use Determinations, page 5-107, the City of Alexandria has not signed the de minimis letter and requests additional information regarding final design.	56
		57	Verify that public parks in the City of Alexandria, not identified as such in the DEIS, do not have additional 4(f) impacts.	57
Affected Environment – Visual Environment	Transportation & Environmental Services	58	The Alternatives section, page 2-56 and the Aesthetics and Visual Environment section, page 3- 54, do not include any mention of retaining or sound walls. How are impacts from the walls shown in the Mapbook included in the DEIS?	58
	Planning & Zoning	59	Preliminary analysis indicates retaining walls not to exceed 10' within the Alexandria portion of the corridor. To the extent possible, retaining walls should utilize landscaping, grading, etc. to minimize visual impact by adjacent communities/ properties.	59
Car Parking	Transportation & Environmental Services Planning & Zoning	60	The gravel lot at Alexandria Union Station, where the proposed additional parking is recommended is currently available to City employees that have a permit. How will this city employee parking be affected? Figure 5.1-23 also shows 150 parking spaces with the reconfigured lot, which likely would not accommodate station employee parking, city employee parking, and rider parking. How will these needs be accommodated? Was any consideration made for structured parking? Has any station parking demand been determined beyond the buildout year of 2040?	60
		61	Please ensure that any discussion on parking is closely coordinated with the City of Alexandria.	61
		62	Does the project team anticipate additional parking supply increases in the City of Alexandria due to the project aside from the 150 spaces identified?	62
		65	Can project funding be used for improvements at Union Station, including improvements to parking facilities?	65
Mapbook D-1 Comments	Transportation & Environmental Services	66	Please clarify the use of the proposed walls shown in blue in the mapbook. What kind of walls are these, how tall are they and what is their purpose? What other stakeholders are proposing potential walls? (per map doted blue line – "proposed by others" Please describe the process for noise mitigation & the associated timeline	66

5

CITY OF ALEXANDRIA (continued)

54. and 55. In the referenced section of the Draft EIS, Dog Run Park is included as one of the "six parks" that will be directly used by the Project. However, based on updated data and refined designs/mitigation measures, permanent impacts to the Dog Run Park at Carlyle are avoided as part of the Preferred Alternative, as reported in Section 5.14 of the Final EIS.

    The Project occurs entirely within existing railroad right-of-way through the City of Alexandria, and there will be no permanent acquisition of other right-of-way. It is important to note that the improvements and impact limits at the Alexandria Station, including improvements to the City-owned parking lot, are provided for station planning by the City and do not indicate property acquisition or impacts by the Project. Retaining walls at the boundary of existing railroad right-of-way is one design measure being employed to minimize impacts to property. Construction of the retaining walls may require temporary construction easements on adjacent properties, including park lands. Lands temporarily used for construction easements will be restored upon completion of construction. Details of the construction easements and restoration plans will be developed in coordination with the landowners during final design.

56. DRPT will continue to coordinate with the City of Alexandria through final design of the Project, including on Section 4(f) resources.

57. Based on the updated GIS information obtained (see response to DRPT-numbered statement #28), there are additional temporary construction impacts to parks, including to Potomac Yard Park, Potomac Yard Landbay N, and Rail Park, as reported in Section 5.14 of the Final EIS. These temporary impacts have been minimized to the extent possible at the conceptual level of design.

58. Refer to DRPT-numbered statement #66 for details on how walls are shown in the Draft EIS mapbooks. Retaining walls are generally used in areas to minimize impacts to adjacent developed areas and, in general, are not out of character with the visual environment in these areas.

(Responses are continued on next page)

November 6, 2017

		54	Under Environmental Consequences, page 4-231, the report does not correctly identify that the impacts to Dog Run Park at Carlyle include permanent impacts as well as temporary impacts.	54
Section 4(f) Evaluation	Recreation, Parks and Cultural Activities	55	Under 5.4.1 Parks and Recreation Areas, page 5-69, the adjacent dog run area would be impacted by the project. The impacts include both temporary and permanent impacts. How can both temporary and permanent impacts be mitigated?	55
		56	Under 5.5.1 Summary of Preliminary Section 4(f) Use Determinations, page 5-107, the City of Alexandria has not signed the de minimis letter and requests additional information regarding final design.	56
		57	Verify that public parks in the City of Alexandria, not identified as such in the DEIS, do not have additional 4(f) impacts.	57
Affected Environment – Visual Environment	Transportation & Environmental Services	58	The Alternatives section, page 2-56 and the Aesthetics and Visual Environment section, page 3- 54, do not include any mention of retaining or sound walls. How are impacts from the walls shown in the Mapbook included in the DEIS?	58
	Planning & Zoning	59	Preliminary analysis indicates retaining walls not to exceed 10' within the Alexandria portion of the corridor. To the extent possible, retaining walls should utilize landscaping, grading, etc. to minimize visual impact by adjacent communities/ properties.	59
Car Parking	Transportation & Environmental Services Planning & Zoning	60	The gravel lot at Alexandria Union Station, where the proposed additional parking is recommended is currently available to City employees that have a permit. How will this city employee parking be affected? Figure 5.1-23 also shows 150 parking spaces with the reconfigured lot, which likely would not accommodate station employee parking, city employee parking, and rider parking. How will these needs be accommodated? Was any consideration made for structured parking? Has any station parking demand been determined beyond the buildout year of 2040?	60
		61	Please ensure that any discussion on parking is closely coordinated with the City of Alexandria.	61
		62	Does the project team anticipate additional parking supply increases in the City of Alexandria due to the project aside from the 150 spaces identified?	62
		65	Can project funding be used for improvements at Union Station, including improvements to parking facilities?	65
Mapbook D-1 Comments	Transportation & Environmental Services	66	Please clarify the use of the proposed walls shown in blue in the mapbook. What kind of walls are these, how tall are they and what is their purpose? What other stakeholders are proposing potential walls? (per map doted blue line – "proposed by others" Please describe the process for noise mitigation & the associated timeline	66

5

CITY OF ALEXANDRIA (continued)

59. The City's comment concerning the visual aesthetics of retaining walls is noted. The height and surface appearance of the retaining walls will be determined during final design, as required at that time.

60. to 62. DRPT developed the conceptual station layout at Alexandria Union Station, including parking area(s) and the number and configuration of parking spaces, based on ridership forecasts projected to the planning horizon year 2045. A surface parking area configuration utilizing the existing unimproved parking area owned by the City of Alexandria was shown to indicate the maximum area of potential impact, and was intended as a concept to show how parking needs could be addressed. Project improvements and impact limits at the Alexandria Union Station, including improvements to the City-owned parking lot, are provided for station planning by the City and do not indicate property acquisition or impacts by the Project. DRPT will work with the City to identify the need and location of parking and to minimize its impacts on existing uses as the layout of the station site progresses from conceptual layout to final design, which will occur after funding becomes available and incremental improvements are scheduled (refer to DRPT-numbered statement #4 for construction / funding details). The DC2RVA Project does not preclude the future development of the station and parking layout by the City, separate from the DC2RVA Project.

[Note that the numbering in the City-provided comments skipped from #62 to #65.]

65. The DC2RVA Project is not funded beyond the NEPA Tier II EIS study, with the exception of one segment of new main track funded through the Atlantic Gateway suite of projects (refer to DRPT-numbered statement #4). The Draft EIS contains conceptual station and parking layouts; however, any actual parking/station improvements will be the responsibility of Amtrak and/or the locality, and could be constructed with a mix of federal, state, local, or other funds. Refer to DRPT-numbered statements #3, #54 and #55, and #60 through #62 for further detail.

(Responses are continued on next page)

November 6, 2017

		54	Under Environmental Consequences, page 4-231, the report does not correctly identify that the impacts to Dog Run Park at Carlyle include permanent impacts as well as temporary impacts.	54
Section 4(f) Evaluation	Recreation, Parks and Cultural Activities	55	Under 5.4.1 Parks and Recreation Areas, page 5-69, the adjacent dog run area would be impacted by the project. The impacts include both temporary and permanent impacts. How can both temporary and permanent impacts be mitigated?	55
		56	Under 5.5.1 Summary of Preliminary Section 4(f) Use Determinations, page 5-107, the City of Alexandria has not signed the de minimis letter and requests additional information regarding final design.	56
		57	Verify that public parks in the City of Alexandria, not identified as such in the DEIS, do not have additional 4(f) impacts.	57
Affected Environment – Visual Environment	Transportation & Environmental Services	58	The Alternatives section, page 2-56 and the Aesthetics and Visual Environment section, page 3- 54, do not include any mention of retaining or sound walls. How are impacts from the walls shown in the Mapbook included in the DEIS?	58
	Planning & Zoning	59	Preliminary analysis indicates retaining walls not to exceed 10' within the Alexandria portion of the corridor. To the extent possible, retaining walls should utilize landscaping, grading, etc. to minimize visual impact by adjacent communities/ properties.	59
Car Parking	Transportation & Environmental Services Planning & Zoning	60	The gravel lot at Alexandria Union Station, where the proposed additional parking is recommended is currently available to City employees that have a permit. How will this city employee parking be affected? Figure 5.1-23 also shows 150 parking spaces with the reconfigured lot, which likely would not accommodate station employee parking, city employee parking, and rider parking. How will these needs be accommodated? Was any consideration made for structured parking? Has any station parking demand been determined beyond the buildout year of 2040?	60
		61	Please ensure that any discussion on parking is closely coordinated with the City of Alexandria.	61
		62	Does the project team anticipate additional parking supply increases in the City of Alexandria due to the project aside from the 150 spaces identified?	62
		65	Can project funding be used for improvements at Union Station, including improvements to parking facilities?	65
Mapbook D-1 Comments	Transportation & Environmental Services	66	Please clarify the use of the proposed walls shown in blue in the mapbook. What kind of walls are these, how tall are they and what is their purpose? What other stakeholders are proposing potential walls? (per map doted blue line – "proposed by others" Please describe the process for noise mitigation & the associated timeline	66

5

CITY OF ALEXANDRIA (continued)

66. The walls shown in blue in the referenced Draft EIS mapbooks (and in the updated Preferred Alternative mapbook that is Appendix L of the Final EIS) are retaining walls. Retaining walls are used to limit the extent of impacts where slopes from the additional track or realigned tracks will extend outside of the existing railroad right-of-way. The height of the retaining walls varies depending on the elevation difference between the track and the adjacent ground. "Walls – proposed by others" refers to wall locations provided by DRPT, VRE, or other stakeholders that are within the corridor and will impact or be impacted by the DC2RVA Project. Noise mitigation is a feature that may be added to retaining wall designs during final design, but it is not a conceptual function of the proposed retaining walls.

    Refer to DRPT numbered response #14 for a discussion of the noise and vibration analysis process.

November 6, 2017

		67	**Temporary Limits of Disturbance -** It's not clear in the maps if the temporary limits of disturbance, in many cases, are supposed to be aligned with the permanent limits of disturbance or ROW, or beyond them, because they are often shown adjacent / outside them, but using the same line configurations.	67
		68	**Temporary Disturbance at Potomac Avenue -** Sheet 4 of 89 shows a temporary limit of disturbance on the east side of Potomac Avenue crossing of Four Mile Run – what is the intent of this area and the impacts anticipated?	68
		69	Sheet 6 of 89 - Will the connection to the CSX / Norfolk Southern Rail spur be maintained during and after construction? This spur will likely be needed for remediation of the GenOn plant site (removing debris etc.), which may be around the same time that construction would occur of the DC2RVA project.	69
		70	**Temporary Disturbance at Cameron Street -** Sheet 8 of 89 shows a temporary limit of disturbance over a portion of Cameron Street – will the operation of Cameron Street be impacted?	70
	Recreation, Parks and Cultural Activities	71	Sheets 4-7 of 89 show several City of Alexandria owned parcels as 'CSXT ROW' per the legend. Please verify and clarify the ownership.	71
	Planning & Zoning	72	Proposed heights of retaining walls will likely have adverse sound impacts to adjacent properties and communities. Some analysis should be conducted to determine impacts	72
		73	To the extent possible, retaining walls should utilize landscaping, grading, etc. to minimize visual impact to adjacent communities/properties. If the walls in some areas need to be 6-9.5ft for example, that may have visual impacts to neighborhoods like Potomac Greens, Old Town Greens, etc.	73
Air Quality Impacts	Transportation & Environmental Services	74	Has the DEIS identified potential impacts on air quality resulting from construction? And potential contamination from soil removal/pounding? What are the impacts?	74
		75	What are the impacts on criteria pollutants (NOx, SOx, CO, PM (2.5 & 10), PB & Oz) emissions from rail operation and construction machinery?	75
Potential contamination	Transportation & Environmental Services	76	Did not see any evaluation of past land use for potential contamination. It appears that the DEIS only looked at sites currently available in existing EPA databases, location of current petroleum facilities. Has the project team coordinated with the City of Alexandria to identify other potential sources of contamination? Given the proposal to locate this construction in the existing railway corridor, contamination likely exists from this use. What is the timeframe for potential Phase II Environmental Site Assessment(s) to include subsurface investigations and associated reports?	76
		77	Has the DEIS identified potential contamination from soil/material removal from construction Activities	77

6

CITY OF ALEXANDRIA (continued)

67. The permanent and temporary limits of disturbance (LOD) presented in the Draft EIS include areas identified during conceptual engineering for construction activities and staging areas to the extent that such areas could be determined at the conceptual level of design. Temporary LOD should be "outside" of the permanent LOD, but may not necessarily align with them where additional area is needed for access or construction staging. Permanent or temporary limits of disturbance may be obscured in the report figures by the right-of-way lines where the right-of-way lines are equivalent to the limits of disturbance. See Appendix L of the Final EIS, which provides detailed mapbooks that show the permanent and temporary LOD for the Preferred Alternative for the Project corridor.

68. Temporary limits of disturbance along the Potomac Avenue crossing of Four Mile Run indicate a potential construction staging area (see Appendix L of the Final EIS for detailed mapbooks that show the permanent and temporary LOD for the Preferred Alternative for the 123-mile Project corridor). The area may be used to stage construction materials and equipment during construction in this area. The intent of the conceptual engineering plans is that the area will be returned to existing conditions, to the extent possible, upon completion of the construction.

69. DRPT anticipates that the connection to the rail spur, known as the PEPCO Lead, north of the Richmond Highway overpass and east of the CSXT main lines will be maintained during construction. A temporary track outage will be scheduled for the PEPCO Lead at a time convenient to CSXT and its customer(s). During this time the PEPCO Lead track will be connected to the fourth track and construction of the fourth track across the existing lead track will be completed.

(Responses are continued on next page)

November 6, 2017

		67	**Temporary Limits of Disturbance -** It's not clear in the maps if the temporary limits of disturbance, in many cases, are supposed to be aligned with the permanent limits of disturbance or ROW, or beyond them, because they are often shown adjacent / outside them, but using the same line configurations.	67
		68	**Temporary Disturbance at Potomac Avenue -** Sheet 4 of 89 shows a temporary limit of disturbance on the east side of Potomac Avenue crossing of Four Mile Run – what is the intent of this area and the impacts anticipated?	68
		69	Sheet 6 of 89 - Will the connection to the CSX / Norfolk Southern Rail spur be maintained during and after construction? This spur will likely be needed for remediation of the GenOn plant site (removing debris etc.), which may be around the same time that construction would occur of the DC2RVA project.	69
		70	**Temporary Disturbance at Cameron Street -** Sheet 8 of 89 shows a temporary limit of disturbance over a portion of Cameron Street – will the operation of Cameron Street be impacted?	70
	Recreation, Parks and Cultural Activities	71	Sheets 4-7 of 89 show several City of Alexandria owned parcels as 'CSXT ROW' per the legend. Please verify and clarify the ownership.	71
	Planning & Zoning	72	Proposed heights of retaining walls will likely have adverse sound impacts to adjacent properties and communities. Some analysis should be conducted to determine impacts	72
		73	To the extent possible, retaining walls should utilize landscaping, grading, etc. to minimize visual impact to adjacent communities/properties. If the walls in some areas need to be 6-9.5ft for example, that may have visual impacts to neighborhoods like Potomac Greens, Old Town Greens, etc.	73
Air Quality Impacts	Transportation & Environmental Services	74	Has the DEIS identified potential impacts on air quality resulting from construction? And potential contamination from soil removal/pounding? What are the impacts?	74
		75	What are the impacts on criteria pollutants (NOx, SOx, CO, PM (2.5 & 10), PB & Oz) emissions from rail operation and construction machinery?	75
Potential contamination	Transportation & Environmental Services	76	Did not see any evaluation of past land use for potential contamination. It appears that the DEIS only looked at sites currently available in existing EPA databases, location of current petroleum facilities. Has the project team coordinated with the City of Alexandria to identify other potential sources of contamination? Given the proposal to locate this construction in the existing railway corridor, contamination likely exists from this use. What is the timeframe for potential Phase II Environmental Site Assessment(s) to include subsurface investigations and associated reports?	76
		77	Has the DEIS identified potential contamination from soil/material removal from construction Activities	77

6

CITY OF ALEXANDRIA (continued)

70. There is the potential for temporary impacts to the operation of Cameron Street, which may include prescheduled and publicly announced temporary lane closures. The temporary lane closures may result from construction means and methods that will be assessed during final design. DRPT will work with the City through final design, after funding becomes available and incremental improvements are scheduled, to minimize any temporary impact to Cameron Street.

71. Parcel ownership is based on GIS data provided to DRPT by the municipalities. Surveys used to verify and clarify property ownership will be performed as part of the final design, as needed; refer to DRPT-numbered statement #4 for construction / funding details.

72. DRPT does not anticipate that the sound and retaining walls will have an adverse effect on noise levels; inclusion of any sound wall or retaining walls will reduce noise levels in areas behind the wall. DRPT did not include sound walls or retaining walls in the noise analysis; therefore, the results conservatively overestimate the potential noise effects associated with the proposed intercity passenger trains. DRPT will continue to evaluate the potential effects of the retaining walls on noise and coordinate with the City during final design, after funding becomes available and incremental improvements are scheduled.

73. The City's comment about retaining walls minimizing visual impacts is noted. Retaining wall design for the Project is at the conceptual engineering level of design. Minimizing the visual impacts of retaining walls will be performed as part of the final design after funding becomes available and incremental improvements are scheduled; refer to DRPT-numbered statement #4 for construction / funding details.

(Responses are continued on next page)

November 6, 2017

		67	**Temporary Limits of Disturbance -** It's not clear in the maps if the temporary limits of disturbance, in many cases, are supposed to be aligned with the permanent limits of disturbance or ROW, or beyond them, because they are often shown adjacent / outside them, but using the same line configurations.	67
		68	**Temporary Disturbance at Potomac Avenue -** Sheet 4 of 89 shows a temporary limit of disturbance on the east side of Potomac Avenue crossing of Four Mile Run – what is the intent of this area and the impacts anticipated?	68
		69	Sheet 6 of 89 - Will the connection to the CSX / Norfolk Southern Rail spur be maintained during and after construction? This spur will likely be needed for remediation of the GenOn plant site (removing debris etc.), which may be around the same time that construction would occur of the DC2RVA project.	69
		70	**Temporary Disturbance at Cameron Street -** Sheet 8 of 89 shows a temporary limit of disturbance over a portion of Cameron Street – will the operation of Cameron Street be impacted?	70
	Recreation, Parks and Cultural Activities	71	Sheets 4-7 of 89 show several City of Alexandria owned parcels as 'CSXT ROW' per the legend. Please verify and clarify the ownership.	71
	Planning & Zoning	72	Proposed heights of retaining walls will likely have adverse sound impacts to adjacent properties and communities. Some analysis should be conducted to determine impacts	72
		73	To the extent possible, retaining walls should utilize landscaping, grading, etc. to minimize visual impact to adjacent communities/properties. If the walls in some areas need to be 6-9.5ft for example, that may have visual impacts to neighborhoods like Potomac Greens, Old Town Greens, etc.	73
Air Quality Impacts	Transportation & Environmental Services	74	Has the DEIS identified potential impacts on air quality resulting from construction? And potential contamination from soil removal/pounding? What are the impacts?	74
		75	What are the impacts on criteria pollutants (NOx, SOx, CO, PM (2.5 & 10), PB & Oz) emissions from rail operation and construction machinery?	75
Potential contamination	Transportation & Environmental Services	76	Did not see any evaluation of past land use for potential contamination. It appears that the DEIS only looked at sites currently available in existing EPA databases, location of current petroleum facilities. Has the project team coordinated with the City of Alexandria to identify other potential sources of contamination? Given the proposal to locate this construction in the existing railway corridor, contamination likely exists from this use. What is the timeframe for potential Phase II Environmental Site Assessment(s) to include subsurface investigations and associated reports?	76
		77	Has the DEIS identified potential contamination from soil/material removal from construction Activities	77

6

CITY OF ALEXANDRIA (continued)

74. A qualitative assessment of potential impacts to air quality from construction has been updated in Final EIS Section 5.19.2.3 since the Draft EIS. DRPT will follow the Virginia Department of Transportation Road and Bridge Specifications during design and construction. Dust suppression or containment systems will be implemented, as appropriate, to minimize migration of airborne contaminants. Contaminated soils identified during construction will be removed and disposed, in accordance with applicable federal and state protocols.

    With the application of appropriate measures during construction, this Project will not cause any significant, short-term particulate matter air quality impacts.

75. The DC2RVA Project is subject to federal air quality general conformity regulations (40 CFR Part 93, Subpart B). Annual Project-generated pollutant emissions related to operations were calculated for the one marginal nonattainment area in the study area (i.e., the Washington, D.C.-Maryland-Virginia ozone marginal nonattainment area). The Project-generated predicted annual pollutant emissions related to operations for nitrogen oxides (NOx) and volatile organic compounds (VOCs)—precursors to ozone—are below general conformity de minimis threshold values within the Washington, D.C.-Maryland-Virginia ozone marginal nonattainment area. Pursuant to the General Conformity Rule, EPA considers Project-generated emissions below these de minimis values to be minimal. Such projects do not require formal conformity determinations. Similarly, given the amount of construction proposed within the Washington, D.C.-Maryland-Virginia ozone marginal nonattainment area, DRPT does not anticipate that construction-related NOx and VOC emissions will exceed the general conformity de minimis thresholds either. Additionally, since the DC2RVA study area is located within areas that are in attainment for the other criteria pollutants (i.e., sulfur dioxide, carbon monoxide, particulate matter, and lead), emissions were not calculated for these pollutants.

(Responses are continued on next page)

November 6, 2017

		67	**Temporary Limits of Disturbance -** It's not clear in the maps if the temporary limits of disturbance, in many cases, are supposed to be aligned with the permanent limits of disturbance or ROW, or beyond them, because they are often shown adjacent / outside them, but using the same line configurations.	67
		68	**Temporary Disturbance at Potomac Avenue -** Sheet 4 of 89 shows a temporary limit of disturbance on the east side of Potomac Avenue crossing of Four Mile Run – what is the intent of this area and the impacts anticipated?	68
		69	Sheet 6 of 89 - Will the connection to the CSX / Norfolk Southern Rail spur be maintained during and after construction? This spur will likely be needed for remediation of the GenOn plant site (removing debris etc.), which may be around the same time that construction would occur of the DC2RVA project.	69
		70	**Temporary Disturbance at Cameron Street -** Sheet 8 of 89 shows a temporary limit of disturbance over a portion of Cameron Street – will the operation of Cameron Street be impacted?	70
	Recreation, Parks and Cultural Activities	71	Sheets 4-7 of 89 show several City of Alexandria owned parcels as 'CSXT ROW' per the legend. Please verify and clarify the ownership.	71
	Planning & Zoning	72	Proposed heights of retaining walls will likely have adverse sound impacts to adjacent properties and communities. Some analysis should be conducted to determine impacts	72
		73	To the extent possible, retaining walls should utilize landscaping, grading, etc. to minimize visual impact to adjacent communities/properties. If the walls in some areas need to be 6-9.5ft for example, that may have visual impacts to neighborhoods like Potomac Greens, Old Town Greens, etc.	73
Air Quality Impacts	Transportation & Environmental Services	74	Has the DEIS identified potential impacts on air quality resulting from construction? And potential contamination from soil removal/pounding? What are the impacts?	74
		75	What are the impacts on criteria pollutants (NOx, SOx, CO, PM (2.5 & 10), PB & Oz) emissions from rail operation and construction machinery?	75
Potential contamination	Transportation & Environmental Services	76	Did not see any evaluation of past land use for potential contamination. It appears that the DEIS only looked at sites currently available in existing EPA databases, location of current petroleum facilities. Has the project team coordinated with the City of Alexandria to identify other potential sources of contamination? Given the proposal to locate this construction in the existing railway corridor, contamination likely exists from this use. What is the timeframe for potential Phase II Environmental Site Assessment(s) to include subsurface investigations and associated reports?	76
		77	Has the DEIS identified potential contamination from soil/material removal from construction Activities	77

6

CITY OF ALEXANDRIA (continued)

76. As discussed in Section 3.5 of the Draft EIS, DRPT conducted an environmental records review to identify hazardous material (hazmat) database records along the Project corridor from Environmental Risk Information Service (ERIS), a commercial database search and environmental risk information provider. Investigation of hazardous material sites/facilities that could potentially be affected by the Project will be completed in a Phase I Environmental Site Assessment that will occur prior to any property acquisition. Construction plans, to be developed during final design, will contain provisions for responding to potential site contamination issues that may be identified during construction.

77. If contaminated soils or materials are encountered during construction, they will be disposed of in accordance with applicable state and federal regulations, as stated in Section 5.5.2 of the Final EIS.

November 6, 2017

Potential Storm water Impacts	Transportation & Environmental Services	78	Stormwater impacts: this statement needs to be evaluated further: (page 4-8 on executive summary)	78
		79	Additional runoff as a result of the Build Alternatives must be controlled per the Virginia Stormwater Management Program (VSMP) regulations for water quality and water quantity due to the increases in impervious surfaces. Stormwater quality and quality requirements for stormwater runoff from the railway, parking lots, buildings, bridges or other areas within the project must be addressed. Additionally, the City has adopted a Stormwater Utility Fee based on a property's impervious area. All property owners will receive a bill beginning May 2018.	79
		80	Short-term adverse impacts on water quality within the study area may result from soil erosion and sedimentation associated with land-disturbing activities during construction if measures are not properly maintained or they are overwhelmed. Land-disturbing activities include construction of the rail bed, tracks, bridges, signal and communication facilities, and other related structures and facilities of the railroad, including grade crossings, clearing of right-of-way, staging areas, access roads, and borrow/spoil areas. Construction-related effects are likely to be similar for road and rail (see Section 4.19 for descriptions of construction activities). Uncontrolled erosion and sedimentation can affect aquatic algae and submerged aquatic vegetation, benthic macro invertebrate habitat, and fish spawning habitat and it can remove food resources for some stream species.	80
Wetlands/ Natural Resources	Recreation, Parks and Cultural Activities	81	The route through the Eisenhower Valley in the City of Alexandria using the color-coded legend (orange track = shift to east or west; black track = existing track), depicts sections of track to be shifted into existing wooded areas between Tarleton Park and Cameron Run Regional Park and the Old Cameron Run Floodplain Forest at the confluence of Strawberry Run and the old Cameron Run channel (OCC in City Flora). If tracks are shifted into these areas there is potential for loss of tree canopy; native vegetation, including uncommon to rare species; and the loss or disturbance of quality wildlife habitats and corridors, which are all concerns to the City of Alexandria.	81

7

CITY OF ALEXANDRIA (continued)

78. Comment noted. The intent of the Executive Summary is to provide a high-level summary of relevant information and the document refers the reader on where to find detailed information in the Draft EIS.

79. DRPT will address all applicable Virginia Stormwater Management Program (VSMP) requirements for water quality and water quantity controls during design and construction of the Project.

80. Comment noted. The City's statements are reflected in Draft EIS Section 4.1.1.3 and Section 4.19.

81. and 82. This comment appears to be referring to a roughly triangular wooded area bounded by two rail lines (see pages D-19 and D-20 in Draft EIS Appendix D, Build Alternatives Area 2 Northern Virginia). According to Simmons (2012),* this area is referred to by Alexandria natural resources staff as "Old Cameron Run channel floodplain forest," which comprises an alluvial bottomland forest community with highly diverse flora and a number of species that are unknown elsewhere in Alexandria, such as squarrose sedge (Carex squarrosa) and Large-seeded forget-me-not (Myosotis macrosperma). Land uses surrounding the site are largely commercial (north of the northern rail line) and recreational and residential (Cameron Run Regional Park and Townes at Cameron Parke) south of the southern rail line. Habitat in the area is highly fragmented and bordered by existing rail lines and dense development. Given the surrounding development, this area represents a wildlife island rather than a wildlife corridor, as suggested by the comment. Further, Project activities will occur within existing railroad right-of-way.

* Simmons, Rod. Remnant Natural Areas in Parks, Waterways, and Undeveloped Sites in the City of Alexandria, Virginia: Eisenhower Valley, Natural Resources Technical Report 12-1. Horticulture and Natural Resources Section, Department of Recreation, Parks & Cultural Activities, City of Alexandria, Virginia. February 2012.

November 6, 2017

		82	An isolated forested tract exists in the City of Alexandria Eisenhower Valley consisting of two contiguous parcels: the 12 acre site at 4050 Wheeler Ave. owned by the Norfolk Southern Railway Co. and a similar-sized parcel to the east that is owned by Virginia American Water. The parcels comprise an alluvial bottomland forest community, with seasonally-flooded back swamp depressions and braided waterways, including the undeveloped lower reaches of Strawberry Run. The flora is highly diverse, and includes a number of species that are unknown elsewhere in Alexandria, such as Squarrose Sedge (Carex squarrosa) and Large-seeded Forget-me- not (Myosotis macrosperma). The relatively large size of these two parcels, abundance of forested wetlands, floristic diversity, and wildlife habitat value make them important sites in Alexandria.	82
		83	Any disturbances near water courses, like Four Mile Run, where earth moving activities will occur, it is recommended to include the control of invasive species that typically rise up out of these construction activities. Native species should be replanted in lieu of typical cold season grass mixes during stabilization.	83
	Planning & Zoning	84	Within segments of the CSX Corridor there are existing trees/landscaping between the rail corridor and adjacent homes. With addition of the additional rail and associated impacts, to the extent possible, preserve or provide replacement landscaping to buffer adjacent homes/uses.	84
	Transportation & Environmental Services	?	Tidal wetlands are protected environmental features under the Chesapeake Bay Preservation Act (CBPA), as incorporated into Article XIII of the Alexandria Zoning Ordinance (the Environmental Management Ordinance - EMO). These features must be protected with a 100' buffer measured landward from the outermost extent of the feature. The tidal wetland and 100' buffer are considered a Resource Protection Area (RPA), which carries special protections. Isolated wetlands are not protected under the CBPA, but they are protected under the City's EMO by applying a 50' buffer that carries many of the same protections as an RPA.	84A
Electromagnetic field generation/ interference	Transportation & Environmental Services	85	Even if the operation of engines is powered by diesel, it is important to understand EMF generation/interference during construction. Have these impacts been studied and will they be identified?	85
Energy Consumption	Transportation & Environmental Services	86	Table 4.23-1 in Ch. 4 indicates that energy consumption changes (no build to build) are Low- Medium for Area 2A. However, section 4.8.1 does not list the source of energy consumption during operation for alt 2A. It also notes that there will not be important changes in energy consumption during construction. What are the sources of increased (medium-low) energy consumption for Alt 2A?	86

8

CITY OF ALEXANDRIA (continued)

(Response to comment 82 on previous page)

83. Invasive species are addressed in Final EIS Section 5.10.1.2.

84. As indicated in Final EIS Section 5.9.2, mitigation of potential visual impacts associated with landscape impacts to be considered during the final design process will include minimizing tree and shrub removal and incorporating landscaping to screen undesirable features. Final design will occur after funding becomes available and incremental improvements are scheduled.

84a. The Project will comply with applicable provisions of the Chesapeake Bay Preservation Act as indicated in Final EIS Section 5.1.1.1. The City of Alexandria's Environmental Management Ordinance explicitly exempts railroads (Section 13-123(A)(1)) from RPA requirements. Notwithstanding, during final design and construction, impacts to tidal and isolated wetlands will be minimized to the extent practicable; unavoidable impacts will be subject to state and federal permits; and appropriate mitigation will be provided, as applicable.

85. EMF (electromagnetic force) generation was not identified as a potential issue during the public and agency scoping process. Because DRPT is not proposing electrification of the line, and is proposing to use the same basic type of diesel locomotives currently in use on the corridor, DRPT does not anticipate that any possible increase in EMF emissions to be a significant impact. Additionally, emission standards for EMF are not regulated by the federal government or by the Commonwealth of Virginia.

86. The Low-Medium designation for Build Alternative 2A in Table 4.23-1 of the Draft EIS is the Visual Impact Rating and not related to Energy. Energy consumption, as presented in Section 4.8-1 of the Draft EIS, was calculated for the entire DC2RVA corridor. DRPT projects that total energy consumption from intercity passenger travel will be lower under the Build Alternatives than the No Build Alternative.

November 6, 2017

Land Acquisition and Land use changes (transport)	Transportation & Environmental Services	87	What are the exact locations and dimensions of the lands that need use change from agricultural to transportation?	87
Various stakeholder coordination	Transportation & Environmental Services	88	Has DRPT Coordinated with Dominion Virginia Power for the construction of the 230 kilovolt, underground transmission line between Alexandria and Arlington County?	88
Water Quality Impacts	Transportation & Environmental Services	89	Long term and short term impacts on water quality may result from impacts to Four Mile Run, Cameron Run, and Cameron Run Tributaries during and after construction. Short term impacts include increased erosion and sediment entering waterways from construction, habitat destruction, increased pollutant loading during replanting phases, and an increase in chemicals entering waterways during construction. Current plans demonstrate long term impacts to RPAs which may result in long term loss of buffer vegetation, loss of wildlife habitat, increased impairment of water quality, decreased stream stabilization, and an increase of toxic compounds from increased train traffic, snow and ice removal chemicals and herbicides. The permanent loss of the tree canopy may result increased water temperatures. There is a potential for increased runoff due to an increase in impervious area.	89
		90	Long term and short term impacts on water quality may result from impacts to the streambed at Four Mile Run. The current plan proposes a major river impact at the Four Mile Run crossing. Short term impacts include increased erosion and sediment from construction and habitat destruction. Long term effects may include loss of aquatic habitat, loss of aquatic vegetation, water quality impairments, decreased stream stabilization, and changes in flow patterns and morphology of the stream.	90
		91	Possible impacts to wetlands include degradation of the wetland habitat through increased erosion during construction and impacts to water quality.	91
		92	Direct impacts are proposed within floodplain areas which may result in degradation of water quality and habitat. If storage is lost within the floodplain, increased flooding may occur.	92
		93	The proposed plan will be required to demonstrate compliance with stormwater quality requirements, to include state phosphorus reductions and the Alexandria water quality volume default. Although the project is conditionally exempt from additional avoidance or minimization of impacts to RPAs, the City will require Water Quality Impact Assessments to be completed due to the large amount of impacts to the City's RPAs associated with streams and wetlands. In addition to the environmental compliance items in the EIS, is the project in compliance with the Chesapeake Bay Act as incorporated in the City's EMO.	93

9

CITY OF ALEXANDRIA (continued)

87. Chapter 3 of the Draft EIS states that "the highest proportion of land use within 500 feet of the DC2RVA rail line is agricultural". This is for the entire corridor, not just the City of Alexandria. Table 3.11-4 of the Draft EIS lists no Agricultural land use for the City of Alexandria. The Agricultural land use within Table 4.11-3 of the Draft EIS, and Table 5.11-3 of the Final EIS, is for each Alternative Area. Area 2 includes not only the City of Alexandria, but also Fairfax County, Prince William County, and Stafford County.

88. DRPT coordinated with Dominion Virginia Power during the planning phase of their 230-kilovolt transmission line between Alexandria and Arlington County, where the CSXT rail corridor was one of several alternative routes being considered. CSXT negotiates agreements for existing utility infrastructure crossing or within their right-of-way. DRPT will coordinate with CSXT regarding the relocation of existing and planned utility infrastructure during the next phase of design to identify potential conflicts with utilities crossing or on CSXT right-of-way and to coordinate the location of planned utilities to reduce or eliminate potential future conflicts. DRPT will coordinate with utility owners, including Dominion Virginia Power, during the next phase of design to identify potential conflicts with utilities outside of CSXT right-of-way and to coordinate the location of planned utilities outside of CSXT right-of-way to reduce or eliminate potential future conflicts.

89. Final EIS Section 5.1.3 addresses water quality issues and Section 5.1.6.3 identifies avoidance, minimization, and mitigation measures that will be implemented.

90. The additional track across Four Mile Run will be built on the existing railroad bridge. Therefore, no construction in the streambed will be necessary. Final EIS Section 5.1.3 addresses water quality issues and Section 5.1.6.3 identifies avoidance, minimization, and mitigation measures that will be implemented.

91. Draft EIS Section 4.1.2 and Final EIS Section 5.1.2 addresses potential impacts to wetlands.

(Responses are continued on next page)

November 6, 2017

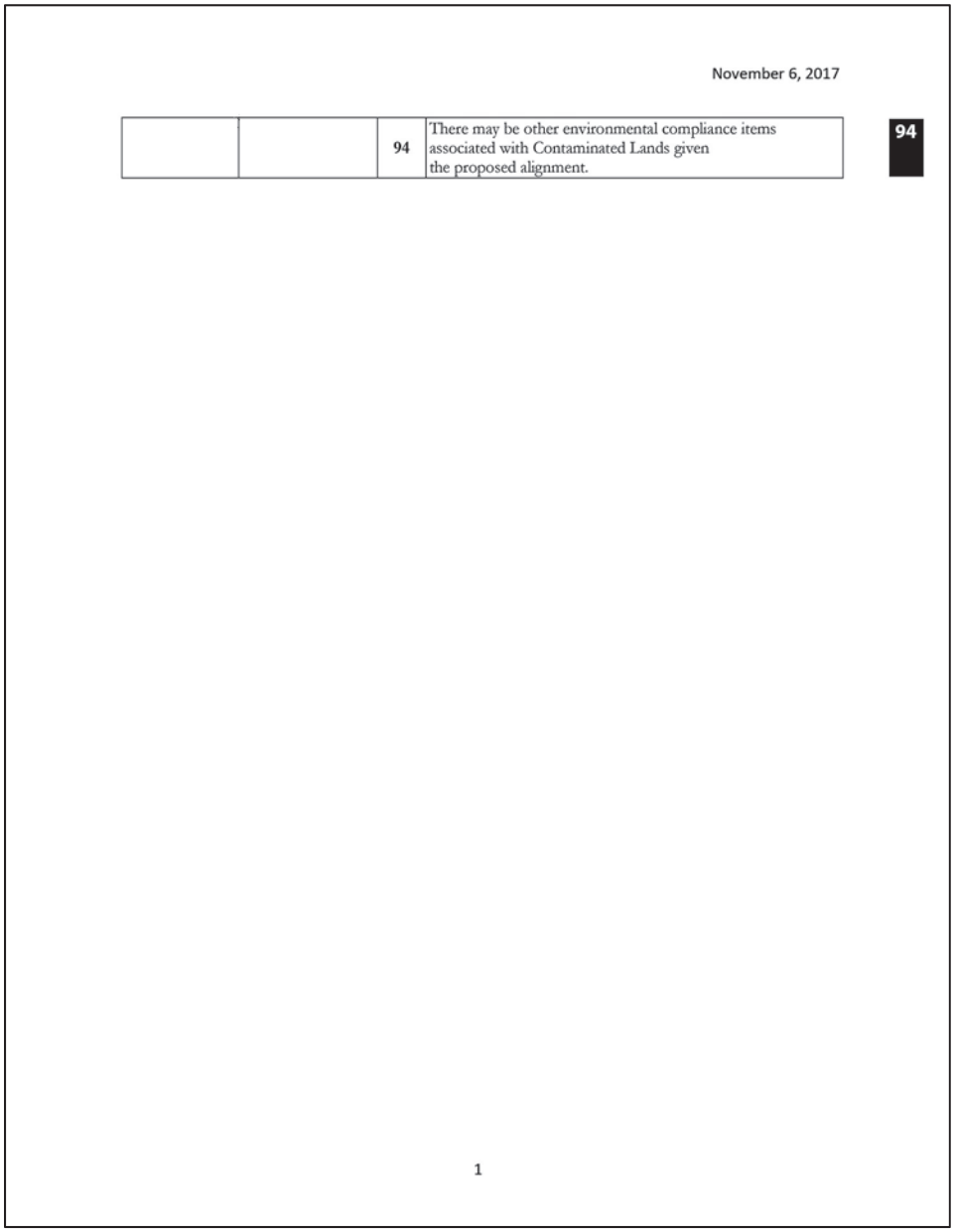
Land Acquisition and Land use changes (transport)	Transportation & Environmental Services	87	What are the exact locations and dimensions of the lands that need use change from agricultural to transportation?	87
Various stakeholder coordination	Transportation & Environmental Services	88	Has DRPT Coordinated with Dominion Virginia Power for the construction of the 230 kilovolt, underground transmission line between Alexandria and Arlington County?	88
Water Quality Impacts	Transportation & Environmental Services	89	Long term and short term impacts on water quality may result from impacts to Four Mile Run, Cameron Run, and Cameron Run Tributaries during and after construction. Short term impacts include increased erosion and sediment entering waterways from construction, habitat destruction, increased pollutant loading during replanting phases, and an increase in chemicals entering waterways during construction. Current plans demonstrate long term impacts to RPAs which may result in long term loss of buffer vegetation, loss of wildlife habitat, increased impairment of water quality, decreased stream stabilization, and an increase of toxic compounds from increased train traffic, snow and ice removal chemicals and herbicides. The permanent loss of the tree canopy may result increased water temperatures. There is a potential for increased runoff due to an increase in impervious area.	89
		90	Long term and short term impacts on water quality may result from impacts to the streambed at Four Mile Run. The current plan proposes a major river impact at the Four Mile Run crossing. Short term impacts include increased erosion and sediment from construction and habitat destruction. Long term effects may include loss of aquatic habitat, loss of aquatic vegetation, water quality impairments, decreased stream stabilization, and changes in flow patterns and morphology of the stream.	90
		91	Possible impacts to wetlands include degradation of the wetland habitat through increased erosion during construction and impacts to water quality.	91
		92	Direct impacts are proposed within floodplain areas which may result in degradation of water quality and habitat. If storage is lost within the floodplain, increased flooding may occur.	92
		93	The proposed plan will be required to demonstrate compliance with stormwater quality requirements, to include state phosphorus reductions and the Alexandria water quality volume default. Although the project is conditionally exempt from additional avoidance or minimization of impacts to RPAs, the City will require Water Quality Impact Assessments to be completed due to the large amount of impacts to the City's RPAs associated with streams and wetlands. In addition to the environmental compliance items in the EIS, is the project in compliance with the Chesapeake Bay Act as incorporated in the City's EMO.	93

9

CITY OF ALEXANDRIA (continued)

92. Draft EIS Section 4.1.1 and Final EIS Section 5.1.1.2 addresses potential impacts to floodplains.

93. See response to DRPT-numbered statement #84a.



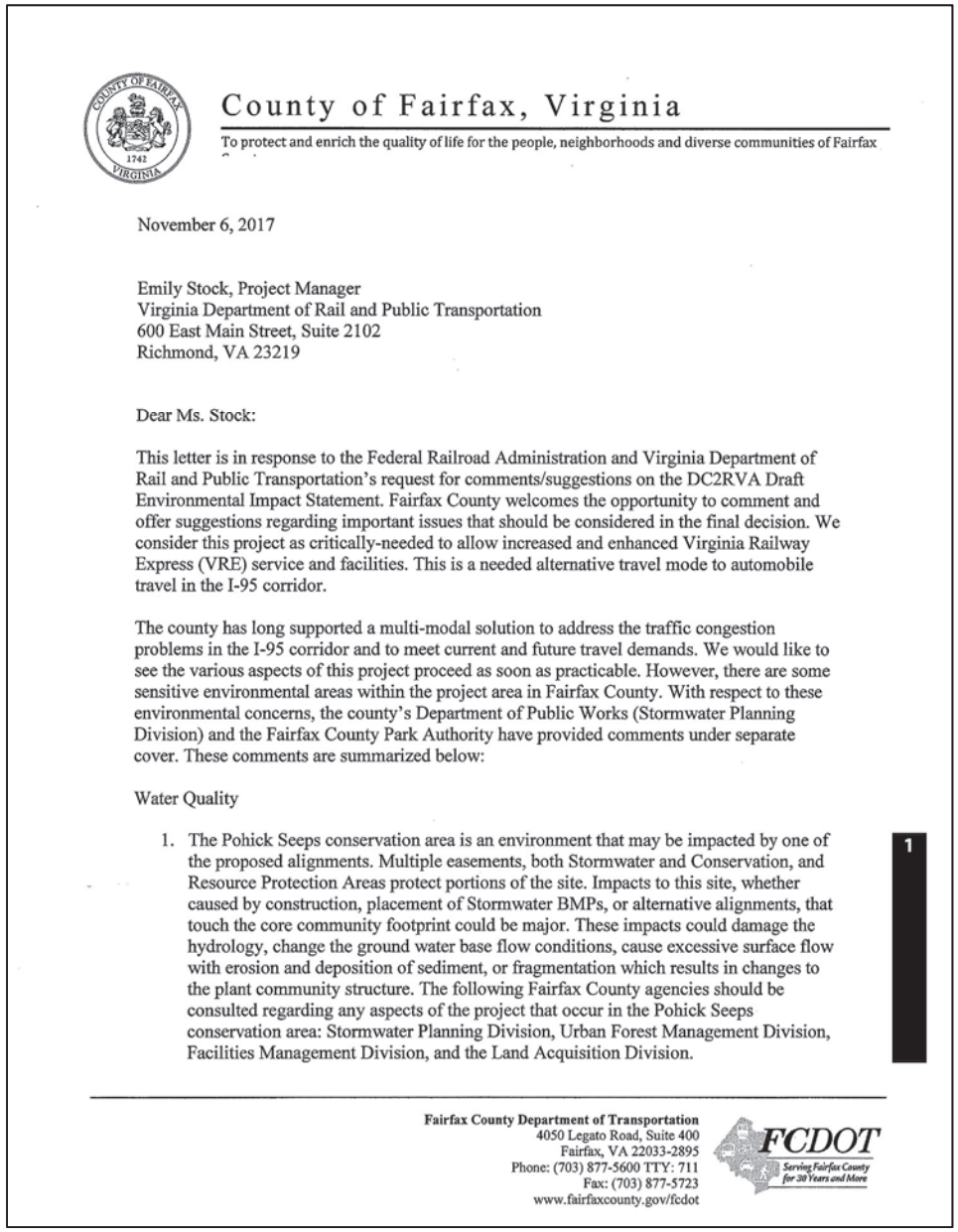
November 6, 2017

		94	There may be other environmental compliance items associated with Contaminated Lands given the proposed alignment.	94

1

CITY OF ALEXANDRIA (continued)

94. Comment noted. See response to DRPT-numbered statement #77.



County of Fairfax, Virginia

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

November 6, 2017

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

Dear Ms. Stock:

This letter is in response to the Federal Railroad Administration and Virginia Department of Rail and Public Transportation's request for comments/suggestions on the DC2RVA Draft Environmental Impact Statement. Fairfax County welcomes the opportunity to comment and offer suggestions regarding important issues that should be considered in the final decision. We consider this project as critically-needed to allow increased and enhanced Virginia Railway Express (VRE) service and facilities. This is a needed alternative travel mode to automobile travel in the I-95 corridor.

The county has long supported a multi-modal solution to address the traffic congestion problems in the I-95 corridor and to meet current and future travel demands. We would like to see the various aspects of this project proceed as soon as practicable. However, there are some sensitive environmental areas within the project area in Fairfax County. With respect to these environmental concerns, the county's Department of Public Works (Stormwater Planning Division) and the Fairfax County Park Authority have provided comments under separate cover. These comments are summarized below:

Water Quality

1. The Pohick Seeps conservation area is an environment that may be impacted by one of the proposed alignments. Multiple easements, both Stormwater and Conservation, and Resource Protection Areas protect portions of the site. Impacts to this site, whether caused by construction, placement of Stormwater BMPs, or alternative alignments, that touch the core community footprint could be major. These impacts could damage the hydrology, change the ground water base flow conditions, cause excessive surface flow with erosion and deposition of sediment, or fragmentation which results in changes to the plant community structure. The following Fairfax County agencies should be consulted regarding any aspects of the project that occur in the Pohick Seeps conservation area: Stormwater Planning Division, Urban Forest Management Division, Facilities Management Division, and the Land Acquisition Division.

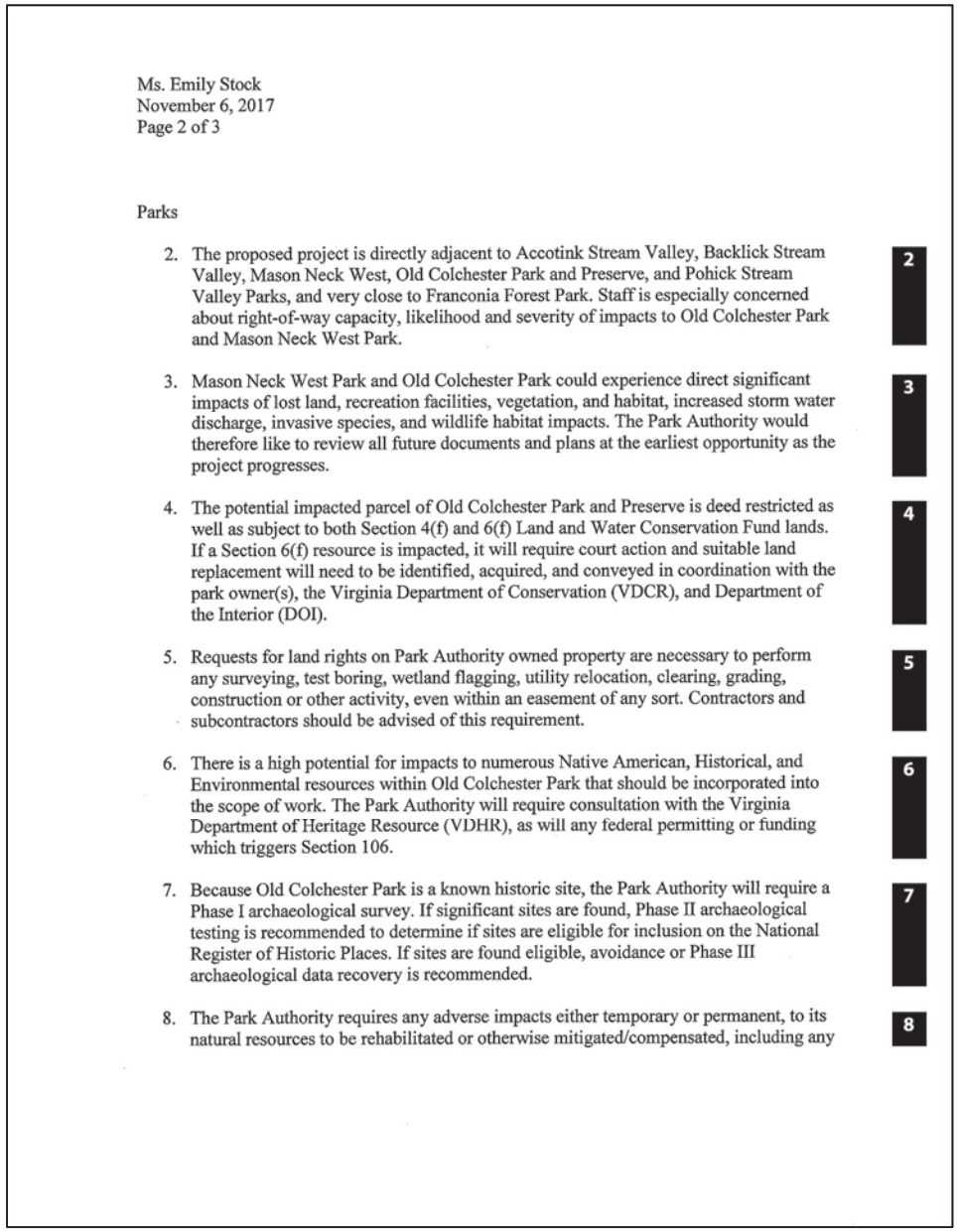
1

Fairfax County Department of Transportation
4050 Legato Road, Suite 400
Fairfax, VA 22033-2895
Phone: (703) 877-5600 TTY: 711
Fax: (703) 877-5723
www.fairfaxcounty.gov/fcdot

FCDOT
Serving Fairfax County for 30 Years and More

FAIRFAX COUNTY

1. The Draft EIS reported that Build Alternative 2A may result in approximately 0.55 acres of temporary impacts to Pohick Seeps Conservation Area. However, DRPT determined that Build Alternative 2A as shown in the Draft EIS would not result in any permanent or temporary impacts to this resource and corrected the impact to zero acres, as shown in the errata table, which is Appendix A of the Final EIS. As reported in Section 5.10.1.1 of the Final EIS, there are no impacts to Pohick Seeps Conservation Area.



Ms. Emily Stock
November 6, 2017
Page 2 of 3

Parks

2. 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, and very close to Franconia Forest Park. Staff is especially concerned about right-of-way capacity, likelihood and severity of impacts to Old Colchester Park and Mason Neck West Park. 2

3. Mason Neck West Park and Old Colchester Park could experience direct significant impacts of lost land, recreation facilities, vegetation, and habitat, increased storm water discharge, invasive species, and wildlife habitat impacts. The Park Authority would therefore like to review all future documents and plans at the earliest opportunity as the project progresses. 3

4. 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). 4

5. Requests for land rights on Park Authority owned property are necessary to perform any surveying, test boring, wetland flagging, utility relocation, clearing, grading, construction or other activity, even within an easement of any sort. Contractors and subcontractors should be advised of this requirement. 5

6. 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 triggers Section 106. 6

7. Because Old Colchester Park 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 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. 7

8. The Park Authority requires any adverse impacts either temporary or permanent, to its natural resources to be rehabilitated or otherwise mitigated/compensated, including any 8

FAIRFAX COUNTY (continued)

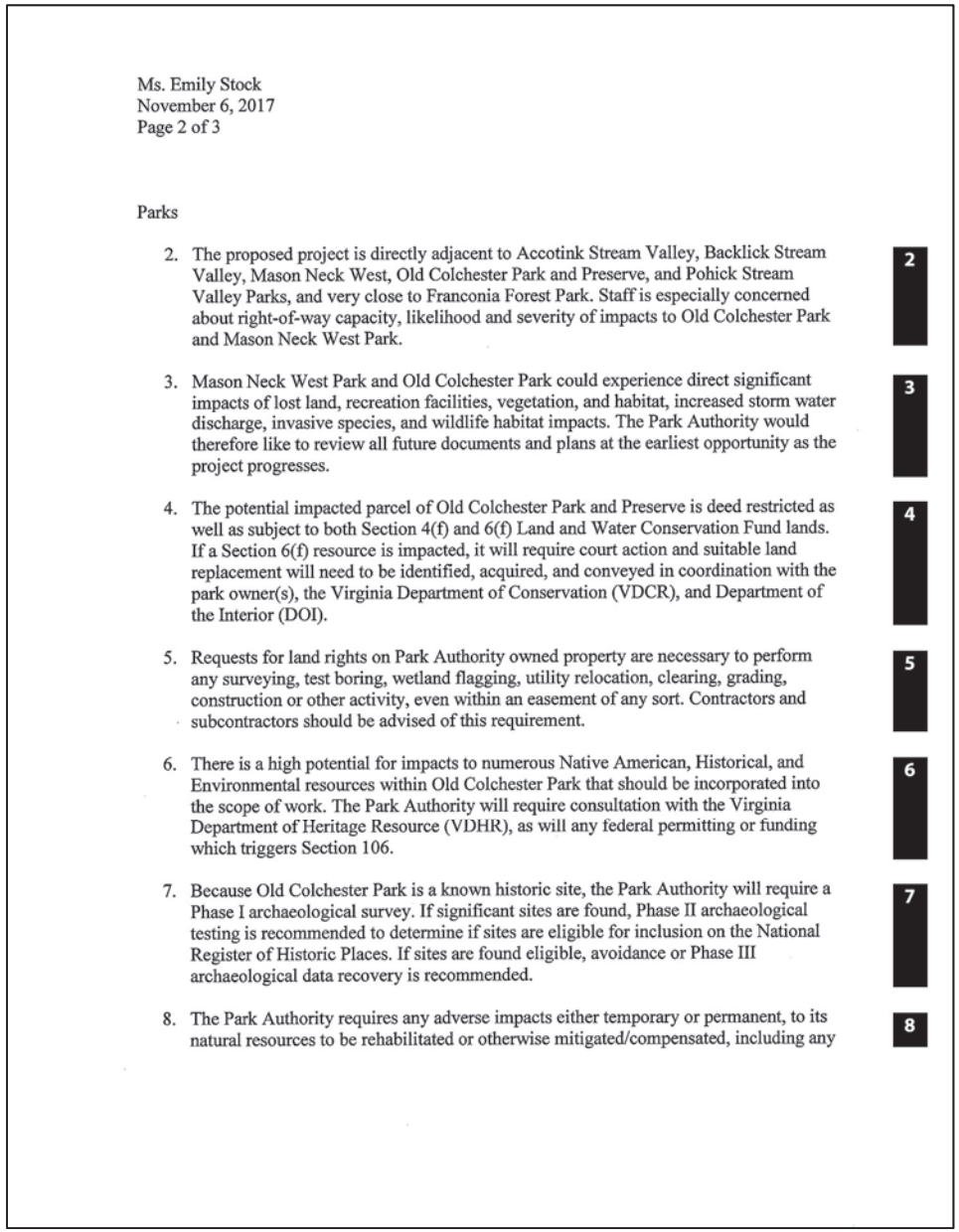
2. The Preferred Alternative in Area 2A does not have any impacts to Accotink Stream Valley, Backlick Stream Valley, Mason Neck West, Old Colchester Park and Preserve, Pohick Stream Valley Park or Franconia Forest Park. No temporary or permanent right-of-way need to be acquired from any of these park facilities as part of this Project. All permanent and temporary impacts to park facilities for the Preferred Alternative are included in Table 5.14-1 of the Final EIS. These facilities are within the study area and are discussed in the errata table which is Appendix A of the Final EIS; however, these parks are not included in Table 5.14-1 since there are no permanent or temporary impacts. Appendix L includes corridor mapping which depicts the permanent and temporary Limits of Disturbance (LOD) adjacent to these park facilities.

3. No right-of-way is needed from Mason Neck West or Old Colchester Park and Preserve; therefore, no land or recreational facilities will be lost as part of the Project. DRPT will continue to coordinate with the Fairfax County Park Authority through the final design phase of the Project on any appropriate mitigation efforts, which will occur after funding becomes available and incremental improvements are scheduled.

4. No temporary or permanent right-of-way will be required from Old Colchester Park and Preserve as part of the Preferred Alternative in Area 2.

5. If, during final design, DRPT determines that a temporary easement onto Fairfax County Park Authority property is required to construct the Project, DRPT would coordinate use of the property with the Park Authority at that time.

(Responses are continued on next page)



Ms. Emily Stock
November 6, 2017
Page 2 of 3

Parks

2. 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, and very close to Franconia Forest Park. Staff is especially concerned about right-of-way capacity, likelihood and severity of impacts to Old Colchester Park and Mason Neck West Park. 2

3. Mason Neck West Park and Old Colchester Park could experience direct significant impacts of lost land, recreation facilities, vegetation, and habitat, increased storm water discharge, invasive species, and wildlife habitat impacts. The Park Authority would therefore like to review all future documents and plans at the earliest opportunity as the project progresses. 3

4. 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). 4

5. Requests for land rights on Park Authority owned property are necessary to perform any surveying, test boring, wetland flagging, utility relocation, clearing, grading, construction or other activity, even within an easement of any sort. Contractors and subcontractors should be advised of this requirement. 5

6. 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 triggers Section 106. 6

7. Because Old Colchester Park 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 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. 7

8. The Park Authority requires any adverse impacts either temporary or permanent, to its natural resources to be rehabilitated or otherwise mitigated/compensated, including any 8

FAIRFAX COUNTY (continued)

6. and 7. There are no permanent or temporary impacts to Old Colchester Park as a park. Regarding it as a cultural resource, the FRA and DRPT have conducted all studies in compliance with the National Historic Preservation Act of 1966, including Project initiation, determination of an area of potential effects (APE), archaeological studies with predictive model, and architectural and archaeological identification- and evaluation-level surveys of the APE. All studies have been coordinated with the Virginia Department of Historic Resources (DHR) and details on these studies and the ensuing coordination can be found in Draft EIS Appendices R and U and Final EIS Appendix D and E. While a portion of Old Colchester Park is a recorded archaeological site, the boundaries for this resource do not extend into the Project limits of disturbance. Archaeological studies were completed in the limits of disturbance as part of the DC2RVA Project to confirm that the site does not extend into the Project area, and no archaeological remains were encountered thus confirming the extant site boundaries.

8. Comment noted. Temporary impacts will be minimized during final design of the Project, after funding becomes available and incremental improvements are scheduled. Any land disturbed by the Project will be restored and rehabilitated.

Ms. Emily Stock
November 6, 2017
Page 3 of 3

terrestrial or aquatic natural resource impact that is not regulated under the jurisdiction of any Federal or state agency. 8

9. 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. The Park Authority 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. 9

Fairfax County appreciates the opportunity to participate in the DC2RVA Tier 2 Draft Environmental Impact Statement process and looks forward to working with FRA and DRPT in the months ahead. Should you have any questions or need additional information, please contact Zachary Krohmal (703) 877-5839 or by email at Zachary.Krohmal@fairfaxcounty.gov.

Sincerely,

Leonard Wolfenstein

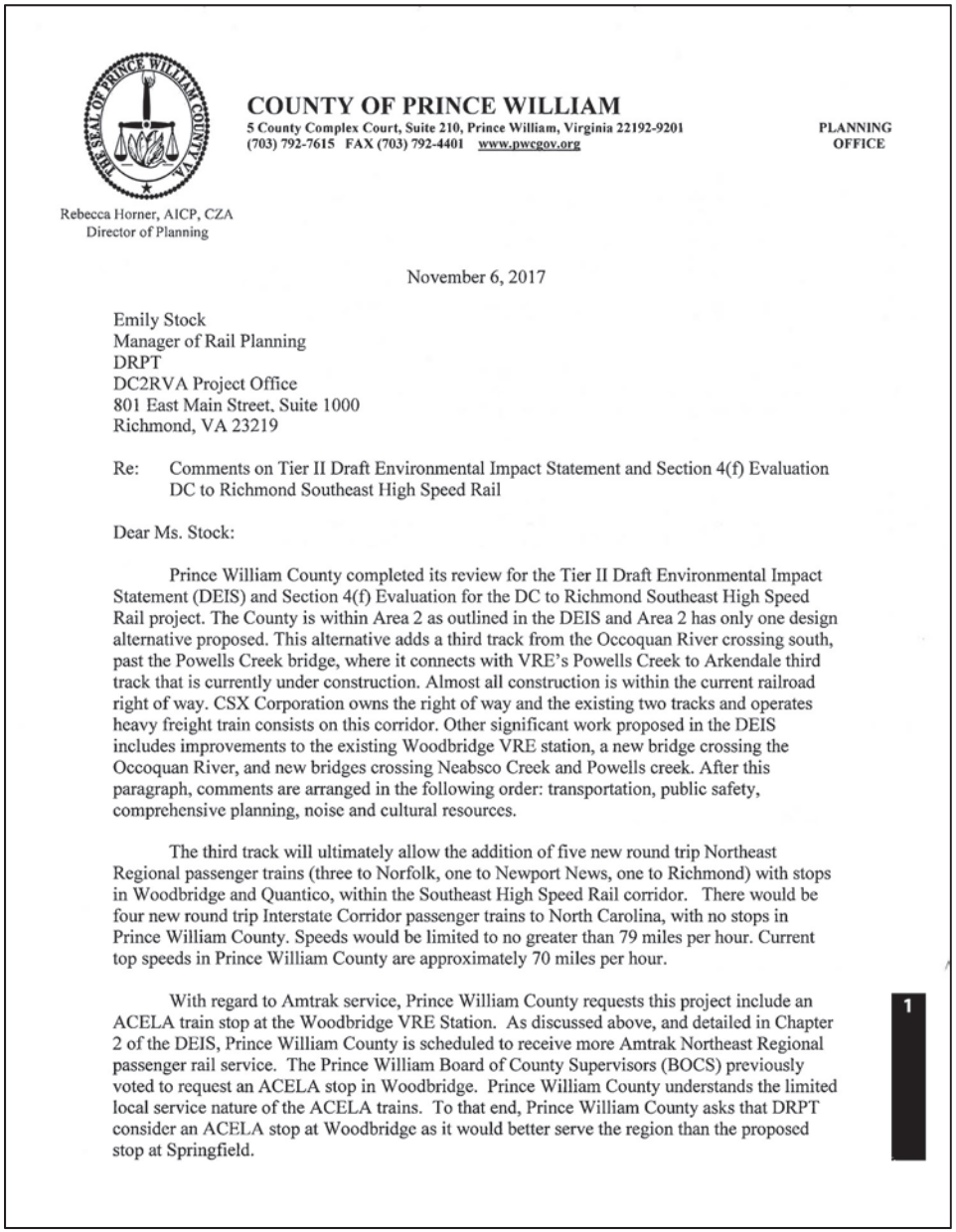
Leonard Wolfenstein, AICP
Chief, Transportation Planning Section
Site Analysis and Transportation Planning Division

cc: Tom Biesiadny, Director, Fairfax County Department of Transportation (FCDOT)
Gregg Steverson, FCDOT
Mike Lake, FCDOT
Noelle Dominguez, FCDOT
Andrea Dorlester, Fairfax County Park Authority
Andy Galusha, FCPA
Denise James, Department of Planning and Zoning
Noel Kaplan, Department of Planning and Zoning
LeAnne Austin, Stormwater Planning Division, DPWES
Shannon Curtis, Stormwater Planning Division, DPWES

FAIRFAX COUNTY (continued)

(Response to comment 8 on previous page)

9. Comment noted. DRPT will continue to coordinate with the Fairfax County Park Authority during the final design phase of the Project, after funding becomes available and incremental improvements are scheduled.



COUNTY OF PRINCE WILLIAM
5 County Complex Court, Suite 210, Prince William, Virginia 22192-9201
(703) 792-7615 FAX (703) 792-4401 www.pwcgov.org

PLANNING OFFICE

Rebecca Horner, AICP, CZA
Director of Planning

November 6, 2017

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

Re: Comments on Tier II Draft Environmental Impact Statement and Section 4(f) Evaluation
DC to Richmond Southeast High Speed Rail

Dear Ms. Stock:

Prince William County completed its review for the Tier II Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation for the DC to Richmond Southeast High Speed Rail project. The County is within Area 2 as outlined in the DEIS and Area 2 has only one design alternative proposed. This alternative adds a third track from the Occoquan River crossing south, past the Powells Creek bridge, where it connects with VRE's Powells Creek to Arkendale third track that is currently under construction. Almost all construction is within the current railroad right of way. CSX Corporation owns the right of way and the existing two tracks and operates heavy freight train consists on this corridor. Other significant work proposed in the DEIS includes improvements to the existing Woodbridge VRE station, a new bridge crossing the Occoquan River, and new bridges crossing Neabsco Creek and Powells creek. After this paragraph, comments are arranged in the following order: transportation, public safety, comprehensive planning, noise and cultural resources.

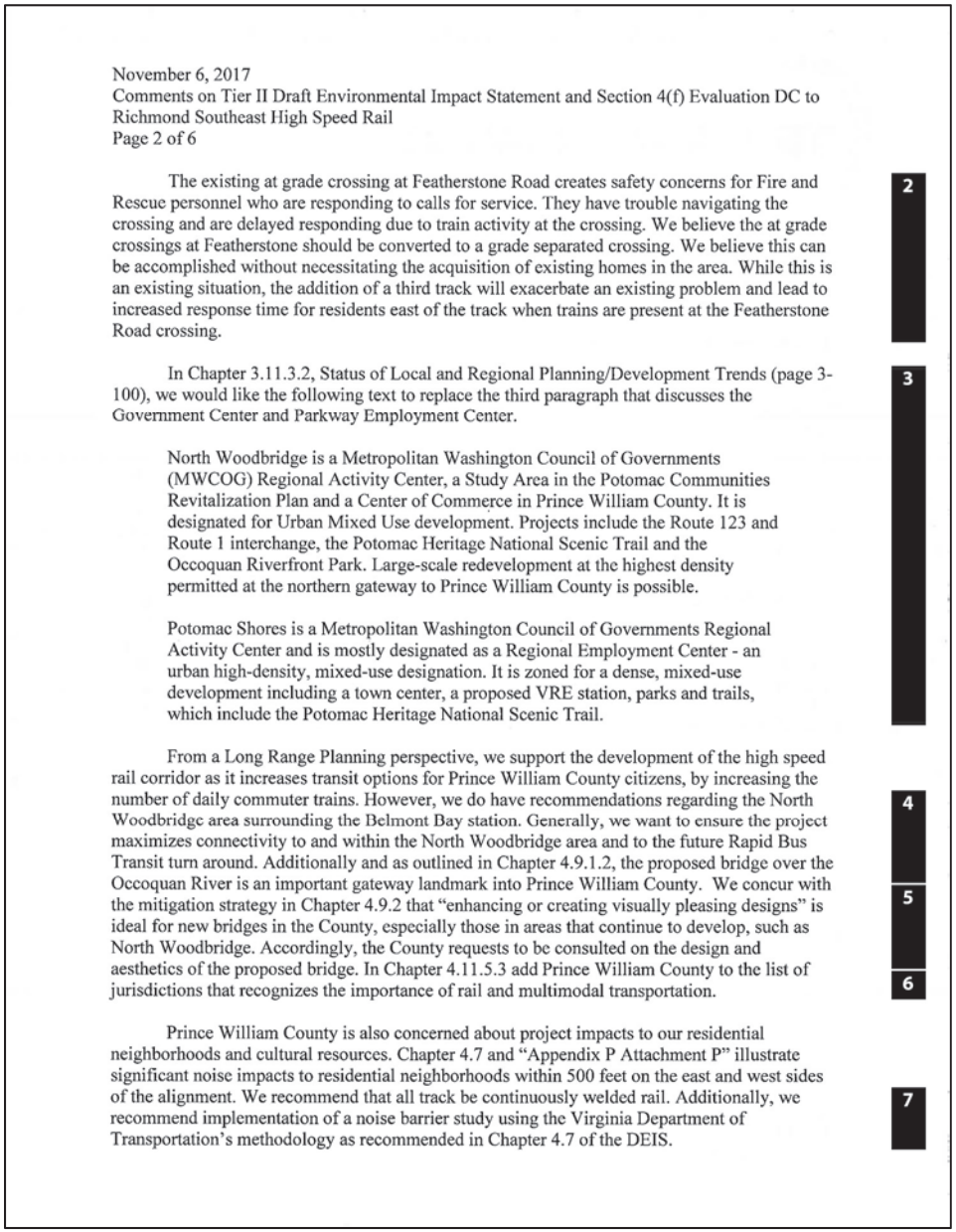
The third track will ultimately allow the addition of five new round trip Northeast Regional passenger trains (three to Norfolk, one to Newport News, one to Richmond) with stops in Woodbridge and Quantico, within the Southeast High Speed Rail corridor. There would be four new round trip Interstate Corridor passenger trains to North Carolina, with no stops in Prince William County. Speeds would be limited to no greater than 79 miles per hour. Current top speeds in Prince William County are approximately 70 miles per hour.

With regard to Amtrak service, Prince William County requests this project include an ACELA train stop at the Woodbridge VRE Station. As discussed above, and detailed in Chapter 2 of the DEIS, Prince William County is scheduled to receive more Amtrak Northeast Regional passenger rail service. The Prince William Board of County Supervisors (BOCS) previously voted to request an ACELA stop in Woodbridge. Prince William County understands the limited local service nature of the ACELA trains. To that end, Prince William County asks that DRPT consider an ACELA stop at Woodbridge as it would better serve the region than the proposed stop at Springfield.

1

PRINCE WILLIAM COUNTY

1. The DC2RVA Project does not include extending the ACELA passenger train service from the Northeast Corridor. The ACELA train sets are electric and operate using an overhead electric catenary system. Based on the decision reached in the 2002 Tier 1 EIS and ROD, and as document in the Project Basis of Design, DRPT is proposing to use conventional diesel-powered train sets. However, one of the guiding principles of the DC2RVA Basis of Design was to not preclude future electrification of the corridor, which would be subject to separate environmental documentation at that time. The actual service levels and schedules proposed for Woodbridge (and other stations) is being refined in the Corridor Service Development Plan, which is being prepared by DRPT as part of the DC2RVA Project (refer to Section 7.3 of the Final EIS for details).



November 6, 2017
Comments on Tier II Draft Environmental Impact Statement and Section 4(f) Evaluation DC to Richmond Southeast High Speed Rail
Page 2 of 6

The existing at grade crossing at Featherstone Road creates safety concerns for Fire and Rescue personnel who are responding to calls for service. They have trouble navigating the crossing and are delayed responding due to train activity at the crossing. We believe the at grade crossings at Featherstone should be converted to a grade separated crossing. We believe this can be accomplished without necessitating the acquisition of existing homes in the area. While this is an existing situation, the addition of a third track will exacerbate an existing problem and lead to increased response time for residents east of the track when trains are present at the Featherstone Road crossing. 2

In Chapter 3.11.3.2, Status of Local and Regional Planning/Development Trends (page 3-100), we would like the following text to replace the third paragraph that discusses the Government Center and Parkway Employment Center. 3

North Woodbridge is a Metropolitan Washington Council of Governments (MWCOG) Regional Activity Center, a Study Area in the Potomac Communities Revitalization Plan and a Center of Commerce in Prince William County. It is designated for Urban Mixed Use development. Projects include the Route 123 and Route 1 interchange, the Potomac Heritage National Scenic Trail and the Occoquan Riverfront Park. Large-scale redevelopment at the highest density permitted at the northern gateway to Prince William County is possible.

Potomac Shores is a Metropolitan Washington Council of Governments Regional Activity Center and is mostly designated as a Regional Employment Center - an urban high-density, mixed-use designation. It is zoned for a dense, mixed-use development including a town center, a proposed VRE station, parks and trails, which include the Potomac Heritage National Scenic Trail.

From a Long Range Planning perspective, we support the development of the high speed rail corridor as it increases transit options for Prince William County citizens, by increasing the number of daily commuter trains. However, we do have recommendations regarding the North Woodbridge area surrounding the Belmont Bay station. Generally, we want to ensure the project maximizes connectivity to and within the North Woodbridge area and to the future Rapid Bus Transit turn around. Additionally and as outlined in Chapter 4.9.1.2, the proposed bridge over the Occoquan River is an important gateway landmark into Prince William County. We concur with the mitigation strategy in Chapter 4.9.2 that "enhancing or creating visually pleasing designs" is ideal for new bridges in the County, especially those in areas that continue to develop, such as North Woodbridge. Accordingly, the County requests to be consulted on the design and aesthetics of the proposed bridge. In Chapter 4.11.5.3 add Prince William County to the list of jurisdictions that recognizes the importance of rail and multimodal transportation. 4 5 6

Prince William County is also concerned about project impacts to our residential neighborhoods and cultural resources. Chapter 4.7 and "Appendix P Attachment P" illustrate significant noise impacts to residential neighborhoods within 500 feet on the east and west sides of the alignment. We recommend that all track be continuously welded rail. Additionally, we recommend implementation of a noise barrier study using the Virginia Department of Transportation's methodology as recommended in Chapter 4.7 of the DEIS. 7

PRINCE WILLIAM COUNTY (continued)

2. The Draft EIS includes a queuing analysis at all at-grade crossings (see Section 4.15.2 of the Draft EIS, and an updated analysis for the Preferred Alternative in Final EIS Section 5.15.2), based on the conceptual engineering for the Project. The analyses indicated that the existing four quadrant gates at Featherstone Road provide appropriate crossing protection for current and future train volumes and number of tracks. Additional review of traffic data to update traffic conditions will be performed for all at-grade crossings as part of final design, after funding becomes available and a construction schedule can be established. Although the traffic analysis performed as part of the DC2RVA Project did not identify the construction of a grade separated roadway crossing of the CSXT rail corridor at Featherstone Road, this does not preclude the county or other entity from constructing a grade separation at this location as part of a separate effort.

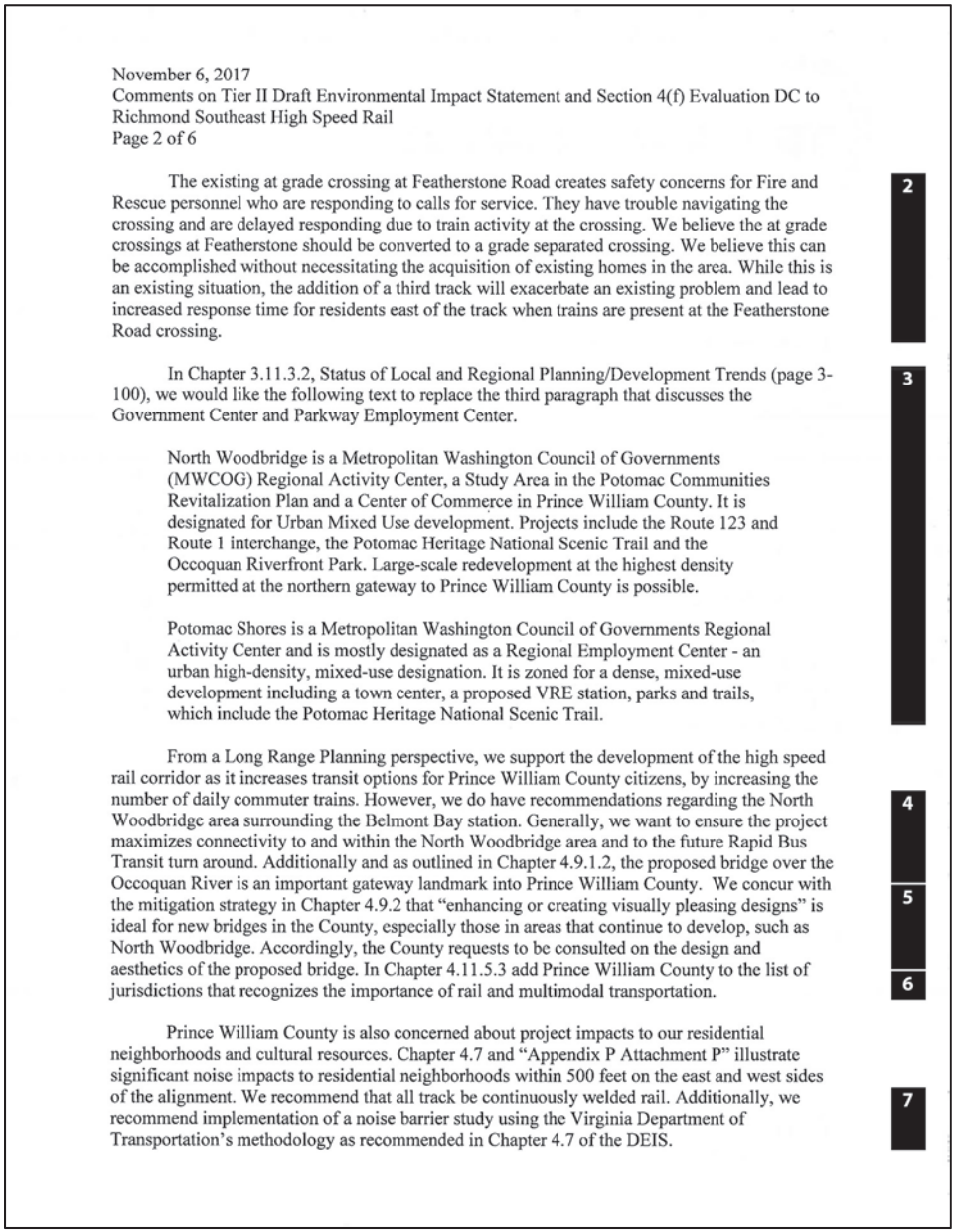
3. The referenced text was replaced, as requested by the County; refer to the errata table for the Draft EIS, which is Appendix A of the Final EIS.

4. The Preferred Alternative will serve both the Amtrak and VRE stations at the Woodbridge Station. While outside the Purpose and Need of the Project, the conceptual designs do not preclude connectivity to and within the North Woodbridge area or to a future Rapid Bus Transit turn around outside of the railroad right-of-way.

5. DRPT welcomes input on the design and aesthetic features of the additional Occoquan River rail bridge, and will continue to coordinate with Prince William County during final design, after funding becomes available and a construction schedule can be established.

6. DRPT acknowledges that Prince William County recognizes the importance of rail and multimodal transportation. The County was added to the list in Chapter 4 of the Draft EIS, as requested by the County; refer to the errata table for the Draft EIS, which is included as Appendix A of the Final EIS.

(Responses are continued on next page)



November 6, 2017
Comments on Tier II Draft Environmental Impact Statement and Section 4(f) Evaluation DC to Richmond Southeast High Speed Rail
Page 2 of 6

The existing at grade crossing at Featherstone Road creates safety concerns for Fire and Rescue personnel who are responding to calls for service. They have trouble navigating the crossing and are delayed responding due to train activity at the crossing. We believe the at grade crossings at Featherstone should be converted to a grade separated crossing. We believe this can be accomplished without necessitating the acquisition of existing homes in the area. While this is an existing situation, the addition of a third track will exacerbate an existing problem and lead to increased response time for residents east of the track when trains are present at the Featherstone Road crossing. 2

In Chapter 3.11.3.2, Status of Local and Regional Planning/Development Trends (page 3-100), we would like the following text to replace the third paragraph that discusses the Government Center and Parkway Employment Center. 3

North Woodbridge is a Metropolitan Washington Council of Governments (MWCOG) Regional Activity Center, a Study Area in the Potomac Communities Revitalization Plan and a Center of Commerce in Prince William County. It is designated for Urban Mixed Use development. Projects include the Route 123 and Route 1 interchange, the Potomac Heritage National Scenic Trail and the Occoquan Riverfront Park. Large-scale redevelopment at the highest density permitted at the northern gateway to Prince William County is possible.

Potomac Shores is a Metropolitan Washington Council of Governments Regional Activity Center and is mostly designated as a Regional Employment Center - an urban high-density, mixed-use designation. It is zoned for a dense, mixed-use development including a town center, a proposed VRE station, parks and trails, which include the Potomac Heritage National Scenic Trail.

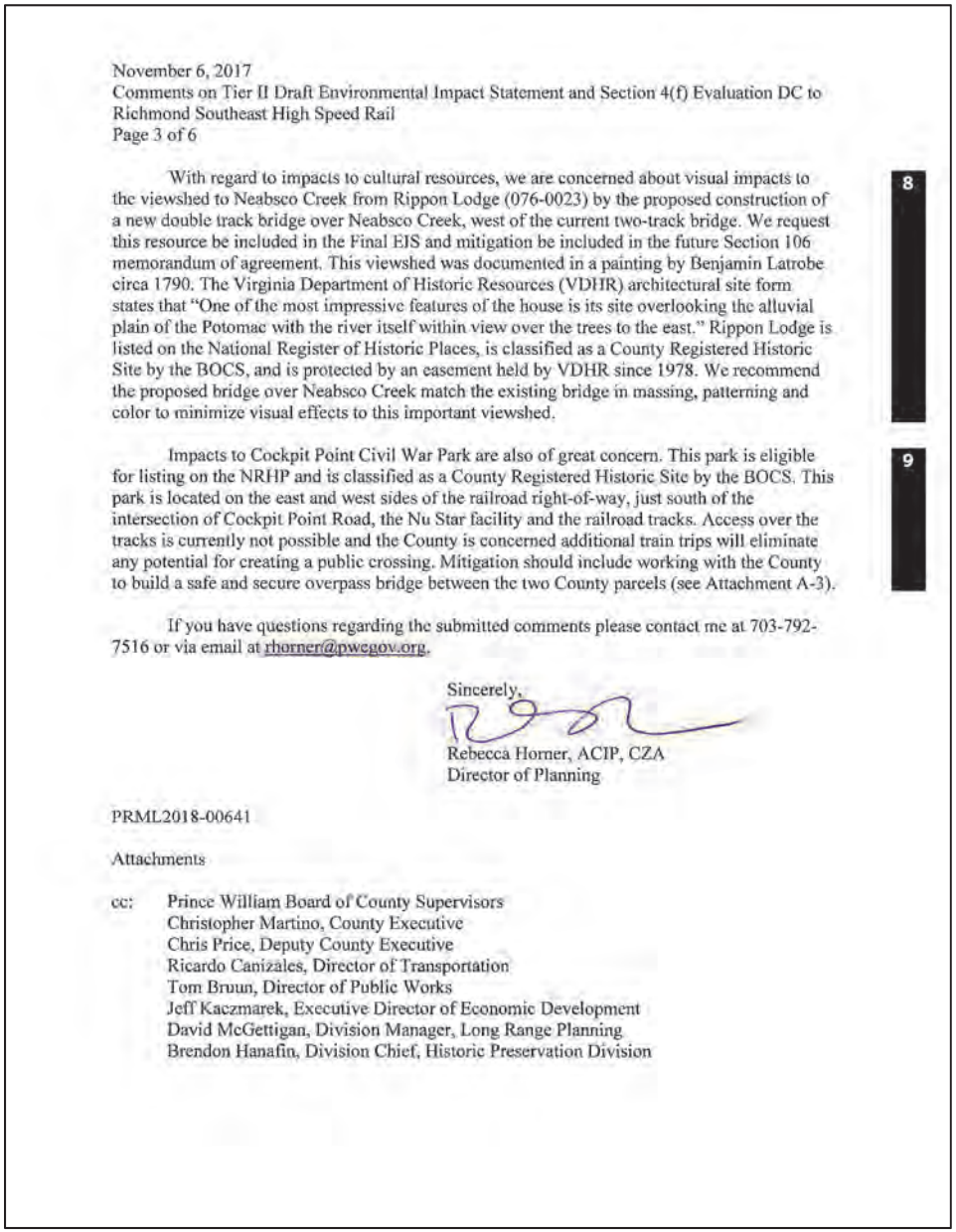
From a Long Range Planning perspective, we support the development of the high speed rail corridor as it increases transit options for Prince William County citizens, by increasing the number of daily commuter trains. However, we do have recommendations regarding the North Woodbridge area surrounding the Belmont Bay station. Generally, we want to ensure the project maximizes connectivity to and within the North Woodbridge area and to the future Rapid Bus Transit turn around. Additionally and as outlined in Chapter 4.9.1.2, the proposed bridge over the Occoquan River is an important gateway landmark into Prince William County. We concur with the mitigation strategy in Chapter 4.9.2 that "enhancing or creating visually pleasing designs" is ideal for new bridges in the County, especially those in areas that continue to develop, such as North Woodbridge. Accordingly, the County requests to be consulted on the design and aesthetics of the proposed bridge. In Chapter 4.11.5.3 add Prince William County to the list of jurisdictions that recognizes the importance of rail and multimodal transportation. 4 5 6

Prince William County is also concerned about project impacts to our residential neighborhoods and cultural resources. Chapter 4.7 and "Appendix P Attachment P" illustrate significant noise impacts to residential neighborhoods within 500 feet on the east and west sides of the alignment. We recommend that all track be continuously welded rail. Additionally, we recommend implementation of a noise barrier study using the Virginia Department of Transportation's methodology as recommended in Chapter 4.7 of the DEIS. 7

PRINCE WILLIAM COUNTY (continued)

7. DRPT proposes to install continuously welded rail on main tracks throughout the corridor as part of the Project. The Draft EIS identifies where moderate and severe noise impacts (as defined by FRA and FTA) are projected to occur as a result of the proposed intercity passenger rail service. The noise and vibration contour figures in Appendix P of the Draft EIS show where Project-related noise and vibration impacts (as defined by FRA) are projected to occur, including in Prince William County. There are no changes to the noise impact contours since the publication of the Draft EIS, with the exception of two areas (in Area 1 and Area 6); these two areas are detailed in Final EIS Section 5.7 and updated maps are provided in Appendix M of the Final EIS, however, they do not change any analyses in Prince William County.

   DRPT will reevaluate potential noise impacts and mitigation measures during final design, as required, which will occur after funding becomes available and incremental improvements are scheduled.



November 6, 2017
Comments on Tier II Draft Environmental Impact Statement and Section 4(f) Evaluation DC to Richmond Southeast High Speed Rail
Page 3 of 6

With regard to impacts to cultural resources, we are concerned about visual impacts to the viewshed to Neabsco Creek from Rippon Lodge (076-0023) by the proposed construction of a new double track bridge over Neabsco Creek, west of the current two-track bridge. We request this resource be included in the Final EIS and mitigation be included in the future Section 106 memorandum of agreement. This viewshed was documented in a painting by Benjamin Latrobe circa 1790. The Virginia Department of Historic Resources (VDHR) architectural site form states that "One of the most impressive features of the house is its site overlooking the alluvial plain of the Potomac with the river itself within view over the trees to the east." Rippon Lodge is listed on the National Register of Historic Places, is classified as a County Registered Historic Site by the BOCS, and is protected by an easement held by VDHR since 1978. We recommend the proposed bridge over Neabsco Creek match the existing bridge in massing, patterning and color to minimize visual effects to this important viewshed. 8

Impacts to Cockpit Point Civil War Park are also of great concern. This park is eligible for listing on the NRHP and is classified as a County Registered Historic Site by the BOCS. This park is located on the east and west sides of the railroad right-of-way, just south of the intersection of Cockpit Point Road, the Nu Star facility and the railroad tracks. Access over the tracks is currently not possible and the County is concerned additional train trips will eliminate any potential for creating a public crossing. Mitigation should include working with the County to build a safe and secure overpass bridge between the two County parcels (see Attachment A-3). 9

If you have questions regarding the submitted comments please contact me at 703-792-7516 or via email at rhorner@pwcgov.org.

Sincerely,

Rebecca Horner, ACIP, CZA
Director of Planning

PRML2018-00641

Attachments

cc: Prince William Board of County Supervisors
Christopher Martino, County Executive
Chris Price, Deputy County Executive
Ricardo Canizales, Director of Transportation
Tom Bruun, Director of Public Works
Jeff Kaczmarek, Executive Director of Economic Development
David McGettigan, Division Manager, Long Range Planning
Brendon Hanafin, Division Chief, Historic Preservation Division

PRINCE WILLIAM COUNTY (continued)

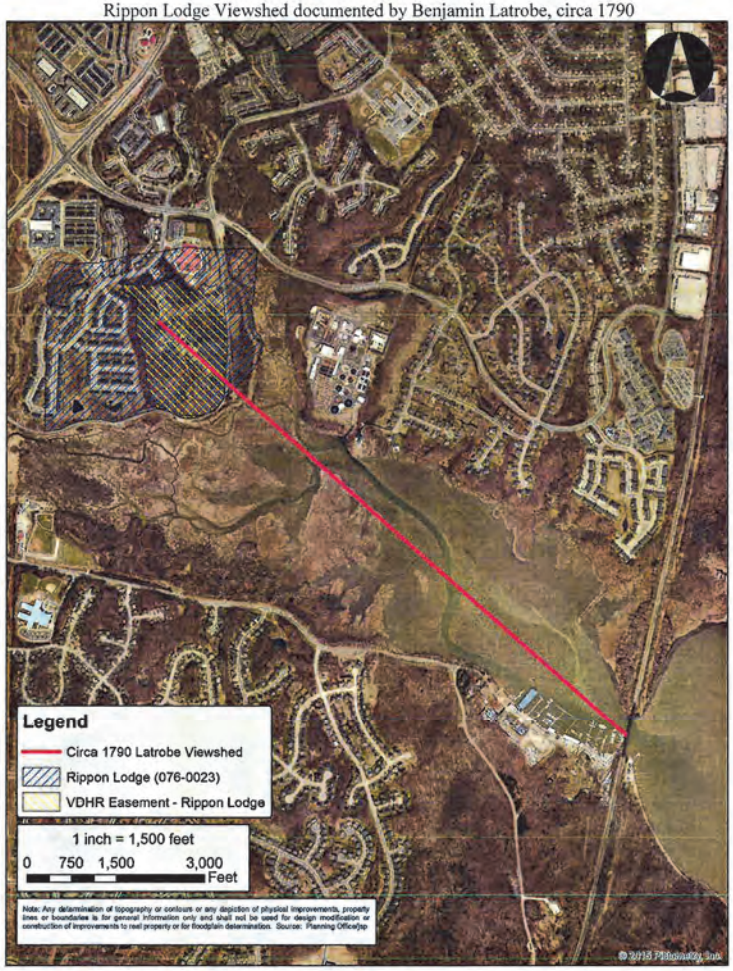
8. DRPT understands the County's concern about Rippon Lodge, which was presented both during consulting party meetings and in written comments. Given those concerns, Rippon Lodge was the subject of additional architectural study, added as a historic property to the Final EIS (see Section 5.13 of the Final EIS and Chapter 6 of the Final EIS), and included in DHR coordination. An analysis of the potential impacts on Rippon Lodge and its viewshed is included in Sections 5.13.1, 5.13.2.2., 5.20.1.3, and 6.5.3.1 in the Final EIS. DRPT welcomes input on the design and aesthetic features of the additional Neabsco Creek rail bridge, and will continue to coordinate with Prince William County during final design, after funding becomes available and a construction schedule can be established.

9. DRPT carefully evaluated the Project's area of potential effects (APE) and the boundaries of the Cockpit Point Civil War Park as part of the Draft EIS. No development planned as part of the Project will occur within or near the boundaries of this resource; as such, it does not fall within the Project's APE. All work being planned in this area is part of the ongoing Arkendale to Powell's Creek project, which was the subject of environmental and cultural resource studies for that project in 2011 and the impacts of which are separate from this Project.

   Title 56, Chapter 13, §56-363 of the Virginia State Code states "It is hereby declared to be the policy of the Commonwealth that all crossings of one railroad by another, or a public highway by a railroad, or a railroad by a public highway, shall, wherever reasonably practicable, pass above or below the existing facility. It is the policy of the Commonwealth to limit the number of new public at grade crossings and to eliminate unnecessary crossings." In accordance with that, any proposed public crossing at this location should be grade separated with pedestrian traffic channelized to reduce the potential for trespassing on railroad right-of-way. The DC2RVA Project does not preclude the possibility of a future grade-separated crossing to be coordinated by the County with CSXT.

Attachments

Rippon Lodge Viewshed documented by Benjamin Latrobe, circa 1790



Page A-1

PRINCE WILLIAM COUNTY (continued)

(No comments on this page)

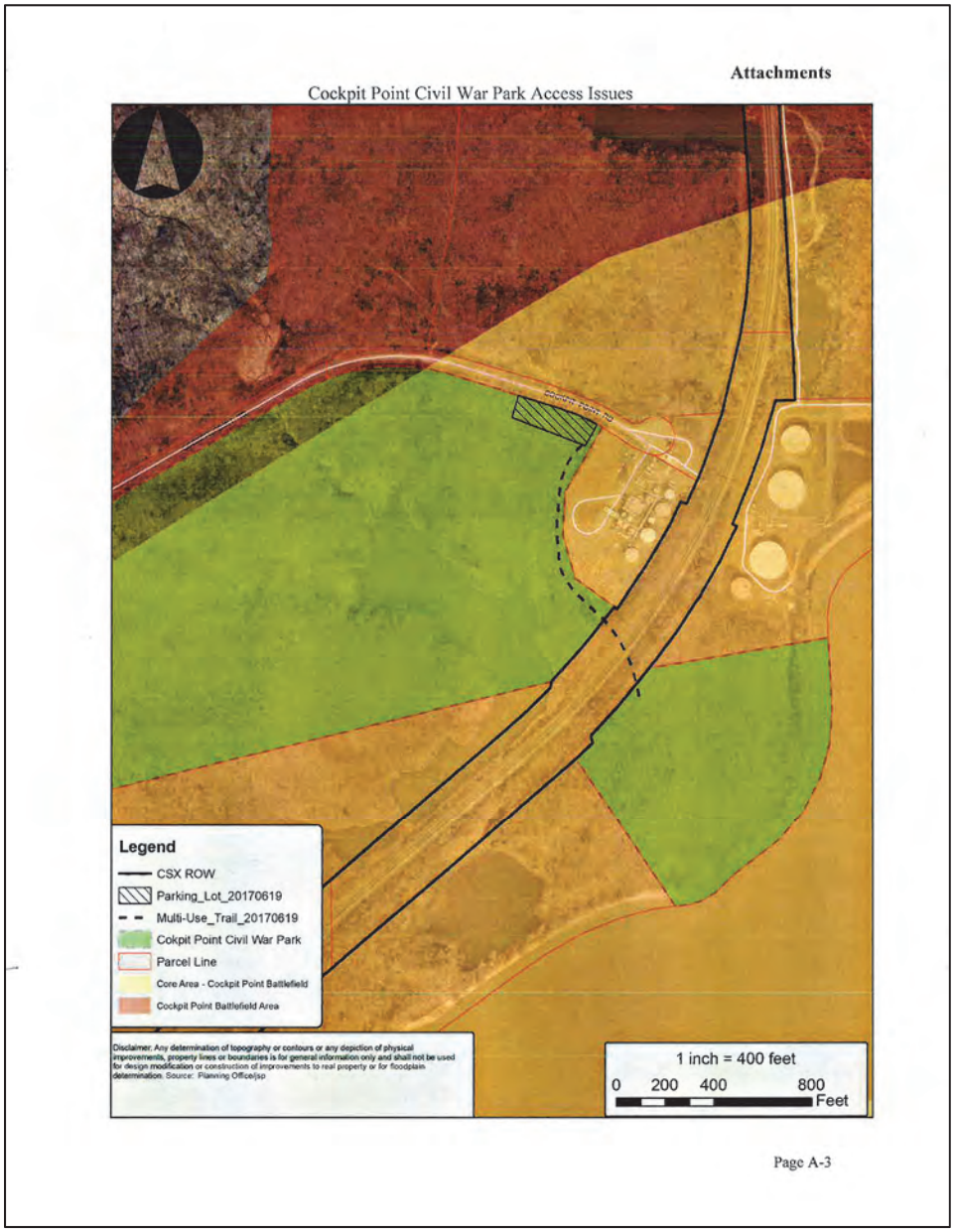
Attachments

Current Railroad Bridge Over Neabsco Bridge

Page A-2

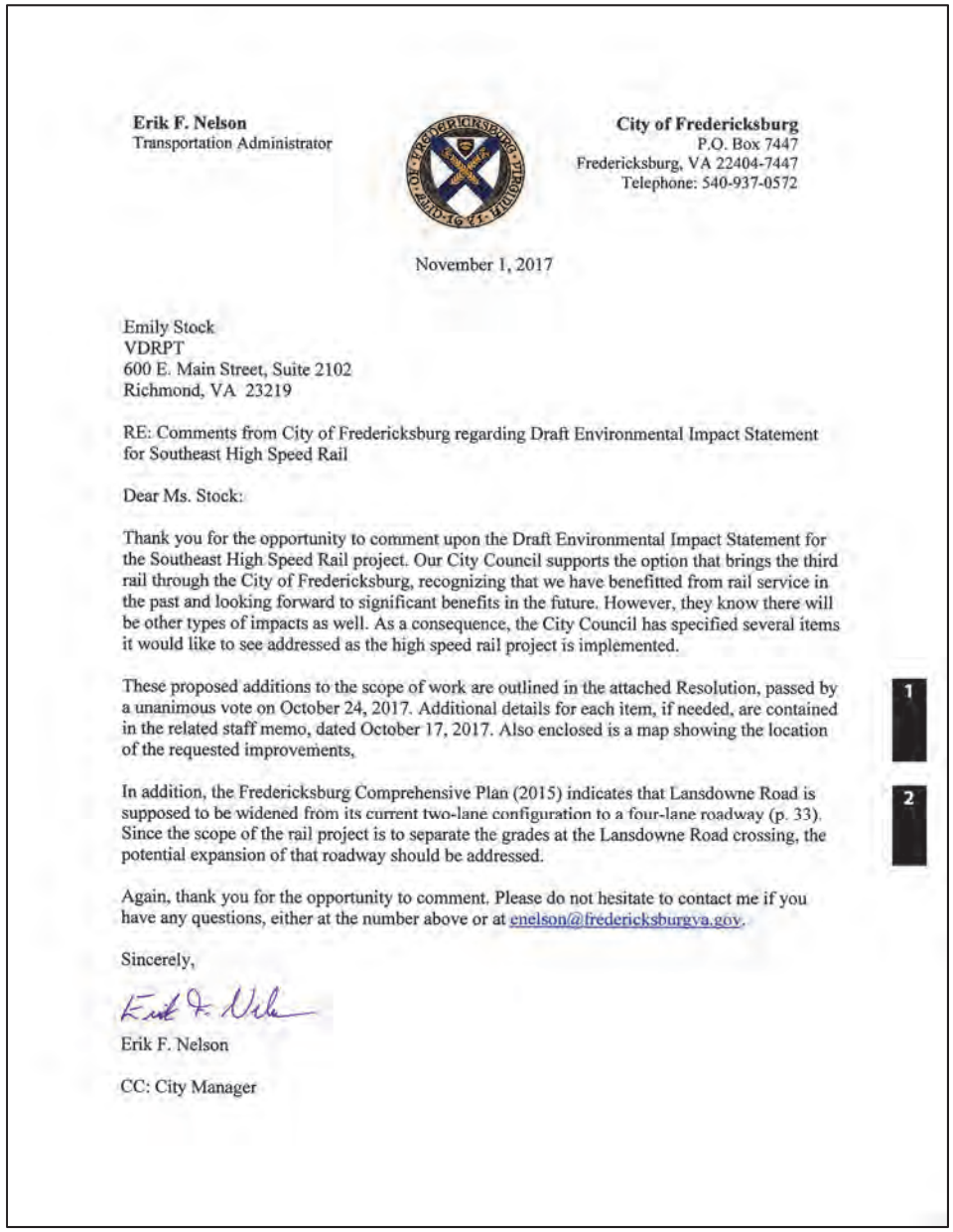
PRINCE WILLIAM COUNTY (continued)

(No comments on this page)



PRINCE WILLIAM COUNTY (continued)

(No comments on this page)



Erik F. Nelson
Transportation Administrator

City of Fredericksburg
P.O. Box 7447
Fredericksburg, VA 22404-7447
Telephone: 540-937-0572

November 1, 2017

Emily Stock
VDRPT
600 E. Main Street, Suite 2102
Richmond, VA 23219

RE: Comments from City of Fredericksburg regarding Draft Environmental Impact Statement for Southeast High Speed Rail

Dear Ms. Stock:

Thank you for the opportunity to comment upon the Draft Environmental Impact Statement for the Southeast High Speed Rail project. Our City Council supports the option that brings the third rail through the City of Fredericksburg, recognizing that we have benefitted from rail service in the past and looking forward to significant benefits in the future. However, they know there will be other types of impacts as well. As a consequence, the City Council has specified several items it would like to see addressed as the high speed rail project is implemented.

These proposed additions to the scope of work are outlined in the attached Resolution, passed by a unanimous vote on October 24, 2017. Additional details for each item, if needed, are contained in the related staff memo, dated October 17, 2017. Also enclosed is a map showing the location of the requested improvements. 1

In addition, the Fredericksburg Comprehensive Plan (2015) indicates that Lansdowne Road is supposed to be widened from its current two-lane configuration to a four-lane roadway (p. 33). Since the scope of the rail project is to separate the grades at the Lansdowne Road crossing, the potential expansion of that roadway should be addressed. 2

Again, thank you for the opportunity to comment. Please do not hesitate to contact me if you have any questions, either at the number above or at enelson@fredericksburgva.gov.

Sincerely,

Erik F. Nelson

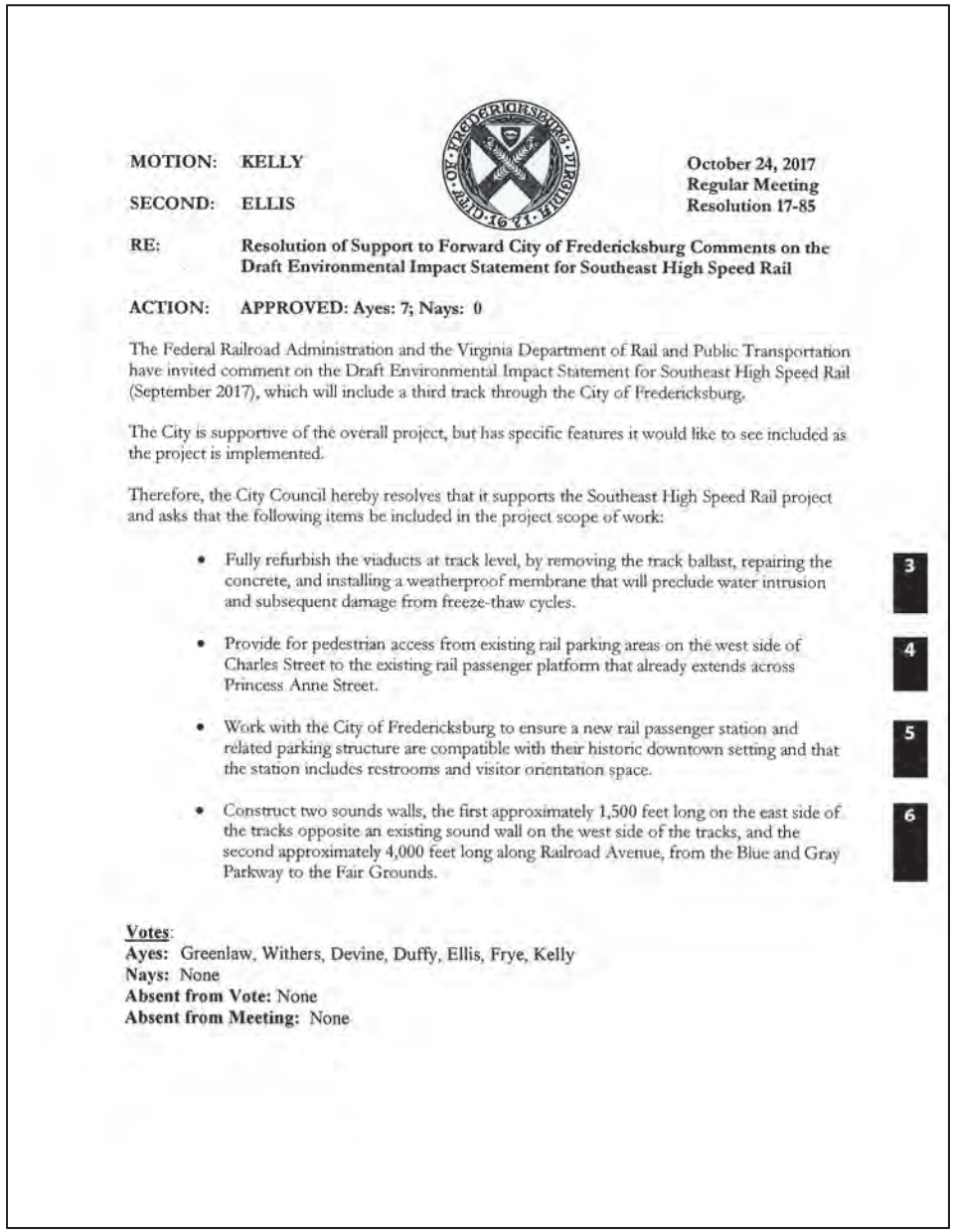
Erik F. Nelson

CC: City Manager

CITY OF FREDERICKSBURG

1. The Department of Rail and Public Transportation (DRPT) has numbered each corresponding statement within both the resolution and the staff memo that the City provided. Refer to the Resolution page provided by the City (fourth page of their letter) for responses to those statements (DRPT-numbered statements #2 through #6 in this response).

2. Designs in support of the Draft and Final Environment Impact Statement (EIS) were prepared at a conceptual level sufficient for assessing the impacts of the DC2RVA Project, which is approximately a 10% level of design (see the beginning of Chapter 4 of the Final EIS for details). While the expansion of Lansdowne Road to a four-lane facility is in the County's comprehensive plan as a possible improvement by 2030, there are no designs, concept plans, funding, or schedule in place to expand Lansdowne Road. Therefore, the conceptual design for the proposed grade separation of Lansdowne Road over the CSXT right-of-way reflects the two-lane roadway in place as of the completion of the Final EIS. Additionally, it is important to note that the Project is not anticipated to affect vehicle volumes or operations on Lansdowne Road. A future expansion of the roadway to four lanes is independent of the DC2RVA Project, and any impacts associated with expanding Lansdowne Road would be a result of that roadway widening project and not the DC2RVA Project. During future phases of design (see Section 7.5 of the Final EIS), DRPT will continue to coordinate with the County to incorporate the comprehensive plan's future roadway improvements in the DC2RVA design plans, as planned and funded at that time.



MOTION: KELLY

SECOND: ELLIS

October 24, 2017
Regular Meeting
Resolution 17-85

RE: **Resolution of Support to Forward City of Fredericksburg Comments on the Draft Environmental Impact Statement for Southeast High Speed Rail**

ACTION: **APPROVED: Ayes: 7; Nays: 0**

The Federal Railroad Administration and the Virginia Department of Rail and Public Transportation have invited comment on the Draft Environmental Impact Statement for Southeast High Speed Rail (September 2017), which will include a third track through the City of Fredericksburg.

The City is supportive of the overall project, but has specific features it would like to see included as the project is implemented.

Therefore, the City Council hereby resolves that it supports the Southeast High Speed Rail project and asks that the following items be included in the project scope of work:

- Fully refurbish the viaducts at track level, by removing the track ballast, repairing the concrete, and installing a weatherproof membrane that will preclude water intrusion and subsequent damage from freeze-thaw cycles. 3
- Provide for pedestrian access from existing rail parking areas on the west side of Charles Street to the existing rail passenger platform that already extends across Princess Anne Street. 4
- Work with the City of Fredericksburg to ensure a new rail passenger station and related parking structure are compatible with their historic downtown setting and that the station includes restrooms and visitor orientation space. 5
- Construct two sounds walls, the first approximately 1,500 feet long on the east side of the tracks opposite an existing sound wall on the west side of the tracks, and the second approximately 4,000 feet long along Railroad Avenue, from the Blue and Gray Parkway to the Fair Grounds. 6

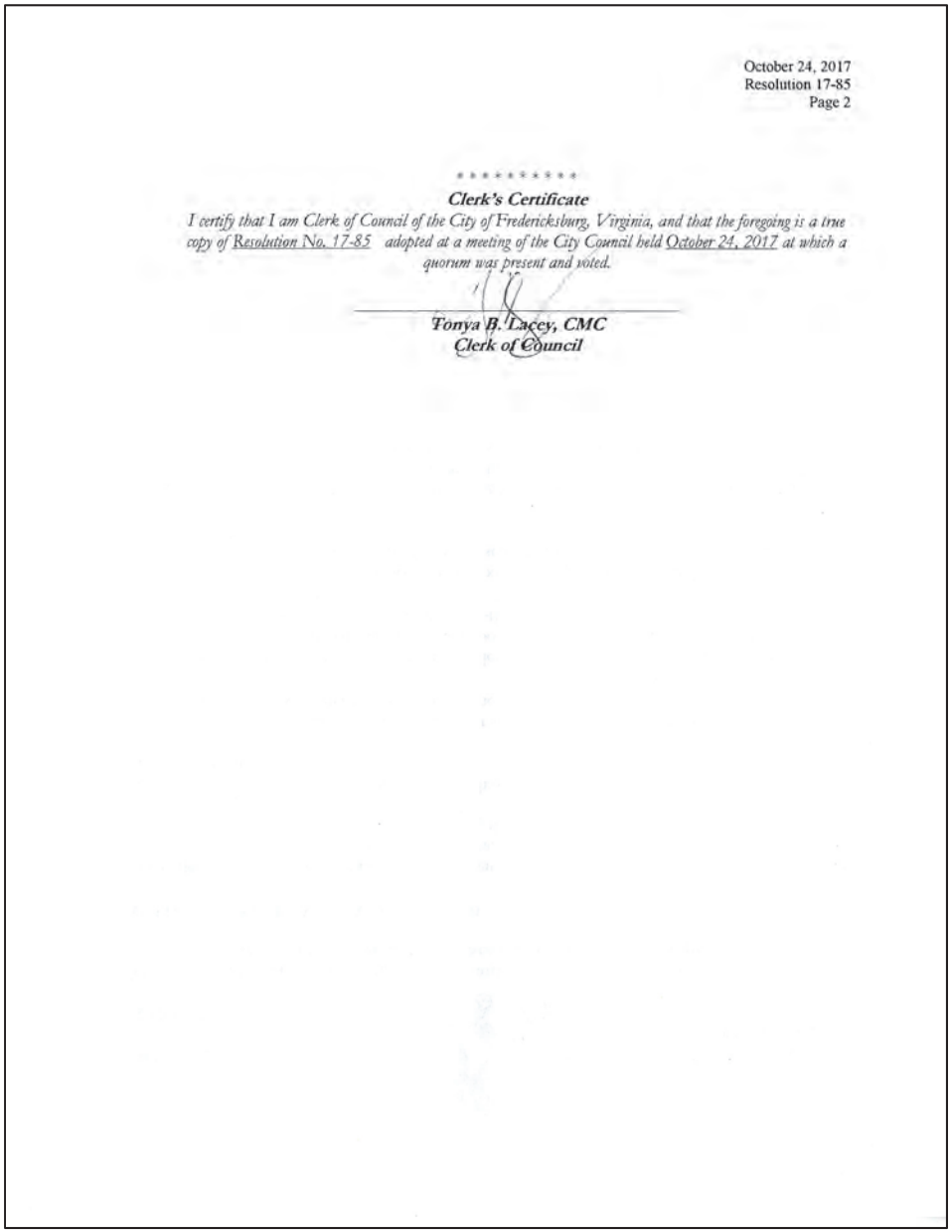
Votes:
Ayes: Greenlaw, Withers, Devine, Duffy, Ellis, Frye, Kelly
Nays: None
Absent from Vote: None
Absent from Meeting: None

CITY OF FREDERICKSBURG (continued)

3. DRPT will work with the City, the host railroad, and other stakeholders to identify and plan for the requested maintenance of the railroad viaducts in downtown Fredericksburg; however, repair of the railroad viaducts is not part of the DC2RVA Project. The viaducts are privately owned by CSXT. The DC2RVA Project does not preclude the City from coordinating with CSXT to survey the existing viaducts, identify potential improvements, and design those improvements; however, the rehabilitation described in the comment is not part of the DC2RVA Project.

4 and 5. DRPT developed conceptual station improvements and layouts for the Final EIS (as shown in Section 4.3), including pedestrian access to platforms, to assess potential impacts of the DC2RVA Project to meet the needs of the proposed additional service. Station improvements, however, are typically the responsibility of the host locality and/or the station owners/operators. Accordingly, DRPT will continue to coordinate any additional planning and future design/development of any Fredericksburg station improvements, including platforms, parking facilities, and other station amenities with the City, Amtrak and VRE to ensure a design compatible with the historic downtown setting and the needs of the stakeholders.

6. DRPT evaluated noise effects of the proposed intercity passenger trains using Federal Railroad Administration (FRA) and Federal Transit Administration (FTA) methods, which qualify potential noise impacts as either moderate or severe. Locations where moderate and severe noise impacts are projected to occur are presented in the noise impact contour figures provided in Appendix P of the Draft EIS, which have not changed in the Fredericksburg area as part of the Preferred Alternative. In accordance with FRA guidance, noise mitigation measures will be considered where severe noise impacts are projected to occur. Mitigation measures will be evaluated in more detail during the final design phase of the Project, which will occur after funding becomes available and incremental improvements are scheduled. The process of evaluating and implementing noise mitigation will occur in accordance with FRA and FTA methods and guidelines, and subject to FRA approval.



October 24, 2017
Resolution 17-85
Page 2

* * * * * * * * * *

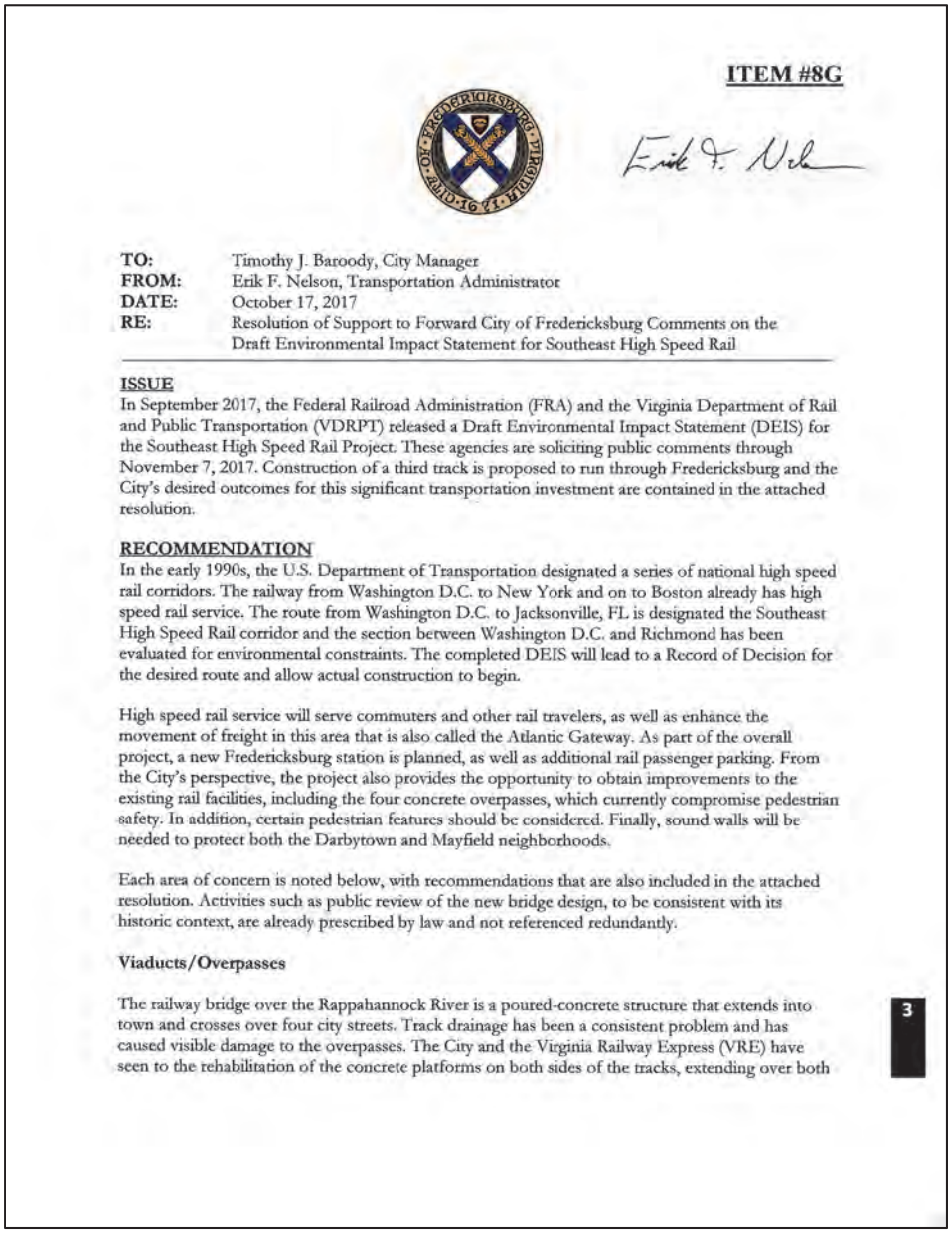
Clerk's Certificate

I certify that I am Clerk of Council of the City of Fredericksburg, Virginia, and that the foregoing is a true copy of Resolution No. 17-85 adopted at a meeting of the City Council held October 24, 2017 at which a quorum was present and voted.

Tonya B. Lacey, CMC
Clerk of Council

CITY OF FREDERICKSBURG (continued)

(No comments on this page)



ITEM #8G

TO: Timothy J. Baroody, City Manager
FROM: Erik F. Nelson, Transportation Administrator
DATE: October 17, 2017
RE: Resolution of Support to Forward City of Fredericksburg Comments on the Draft Environmental Impact Statement for Southeast High Speed Rail

ISSUE

In September 2017, the Federal Railroad Administration (FRA) and the Virginia Department of Rail and Public Transportation (VDRPT) released a Draft Environmental Impact Statement (DEIS) for the Southeast High Speed Rail Project. These agencies are soliciting public comments through November 7, 2017. Construction of a third track is proposed to run through Fredericksburg and the City's desired outcomes for this significant transportation investment are contained in the attached resolution.

RECOMMENDATION

In the early 1990s, the U.S. Department of Transportation designated a series of national high speed rail corridors. The railway from Washington D.C. to New York and on to Boston already has high speed rail service. The route from Washington D.C. to Jacksonville, FL is designated the Southeast High Speed Rail corridor and the section between Washington D.C. and Richmond has been evaluated for environmental constraints. The completed DEIS will lead to a Record of Decision for the desired route and allow actual construction to begin.

High speed rail service will serve commuters and other rail travelers, as well as enhance the movement of freight in this area that is also called the Atlantic Gateway. As part of the overall project, a new Fredericksburg station is planned, as well as additional rail passenger parking. From the City's perspective, the project also provides the opportunity to obtain improvements to the existing rail facilities, including the four concrete overpasses, which currently compromise pedestrian safety. In addition, certain pedestrian features should be considered. Finally, sound walls will be needed to protect both the Darbytown and Mayfield neighborhoods.

Each area of concern is noted below, with recommendations that are also included in the attached resolution. Activities such as public review of the new bridge design, to be consistent with its historic context, are already prescribed by law and not referenced redundantly.

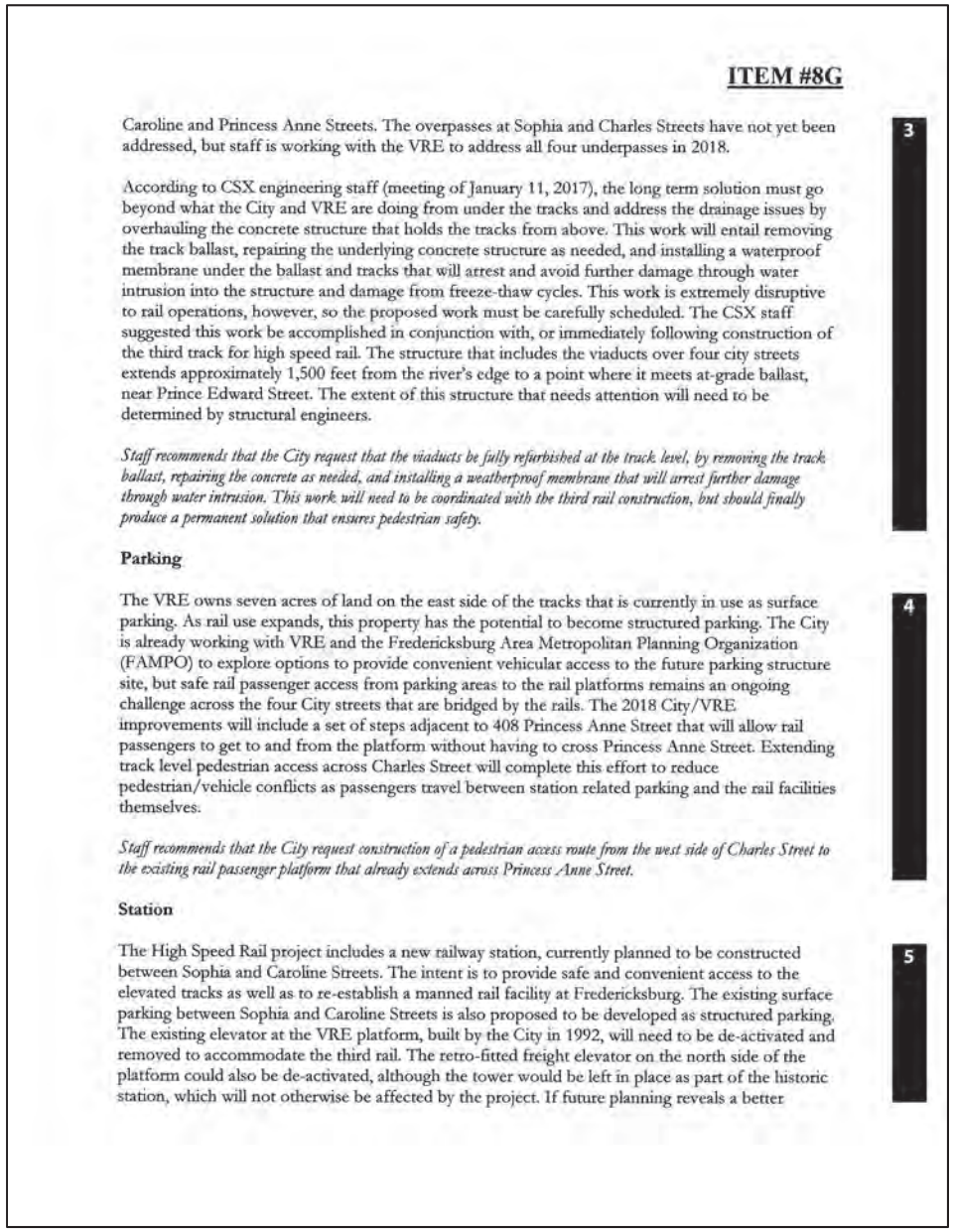
Viaducts/Overpasses

The railway bridge over the Rappahannock River is a poured-concrete structure that extends into town and crosses over four city streets. Track drainage has been a consistent problem and has caused visible damage to the overpasses. The City and the Virginia Railway Express (VRE) have seen to the rehabilitation of the concrete platforms on both sides of the tracks, extending over both

3

CITY OF FREDERICKSBURG (continued)

(See DRPT-numbered statement #1. Responses to DRPT-numbered statements #3, #4, #5, and #6 provided on previous pages.)



ITEM #8G

Caroline and Princess Anne Streets. The overpasses at Sophia and Charles Streets have not yet been addressed, but staff is working with the VRE to address all four underpasses in 2018.

3

According to CSX engineering staff (meeting of January 11, 2017), the long term solution must go beyond what the City and VRE are doing from under the tracks and address the drainage issues by overhauling the concrete structure that holds the tracks from above. This work will entail removing the track ballast, repairing the underlying concrete structure as needed, and installing a waterproof membrane under the ballast and tracks that will arrest and avoid further damage through water intrusion into the structure and damage from freeze-thaw cycles. This work is extremely disruptive to rail operations, however, so the proposed work must be carefully scheduled. The CSX staff suggested this work be accomplished in conjunction with, or immediately following construction of the third track for high speed rail. The structure that includes the viaducts over four city streets extends approximately 1,500 feet from the river's edge to a point where it meets at-grade ballast, near Prince Edward Street. The extent of this structure that needs attention will need to be determined by structural engineers.

Staff recommends that the City request that the viaducts be fully refurbished at the track level, by removing the track ballast, repairing the concrete as needed, and installing a weatherproof membrane that will arrest further damage through water intrusion. This work will need to be coordinated with the third rail construction, but should finally produce a permanent solution that ensures pedestrian safety.

Parking

4

The VRE owns seven acres of land on the east side of the tracks that is currently in use as surface parking. As rail use expands, this property has the potential to become structured parking. The City is already working with VRE and the Fredericksburg Area Metropolitan Planning Organization (FAMPO) to explore options to provide convenient vehicular access to the future parking structure site, but safe rail passenger access from parking areas to the rail platforms remains an ongoing challenge across the four City streets that are bridged by the rails. The 2018 City/VRE improvements will include a set of steps adjacent to 408 Princess Anne Street that will allow rail passengers to get to and from the platform without having to cross Princess Anne Street. Extending track level pedestrian access across Charles Street will complete this effort to reduce pedestrian/vehicle conflicts as passengers travel between station related parking and the rail facilities themselves.

Staff recommends that the City request construction of a pedestrian access route from the west side of Charles Street to the existing rail passenger platform that already extends across Princess Anne Street.

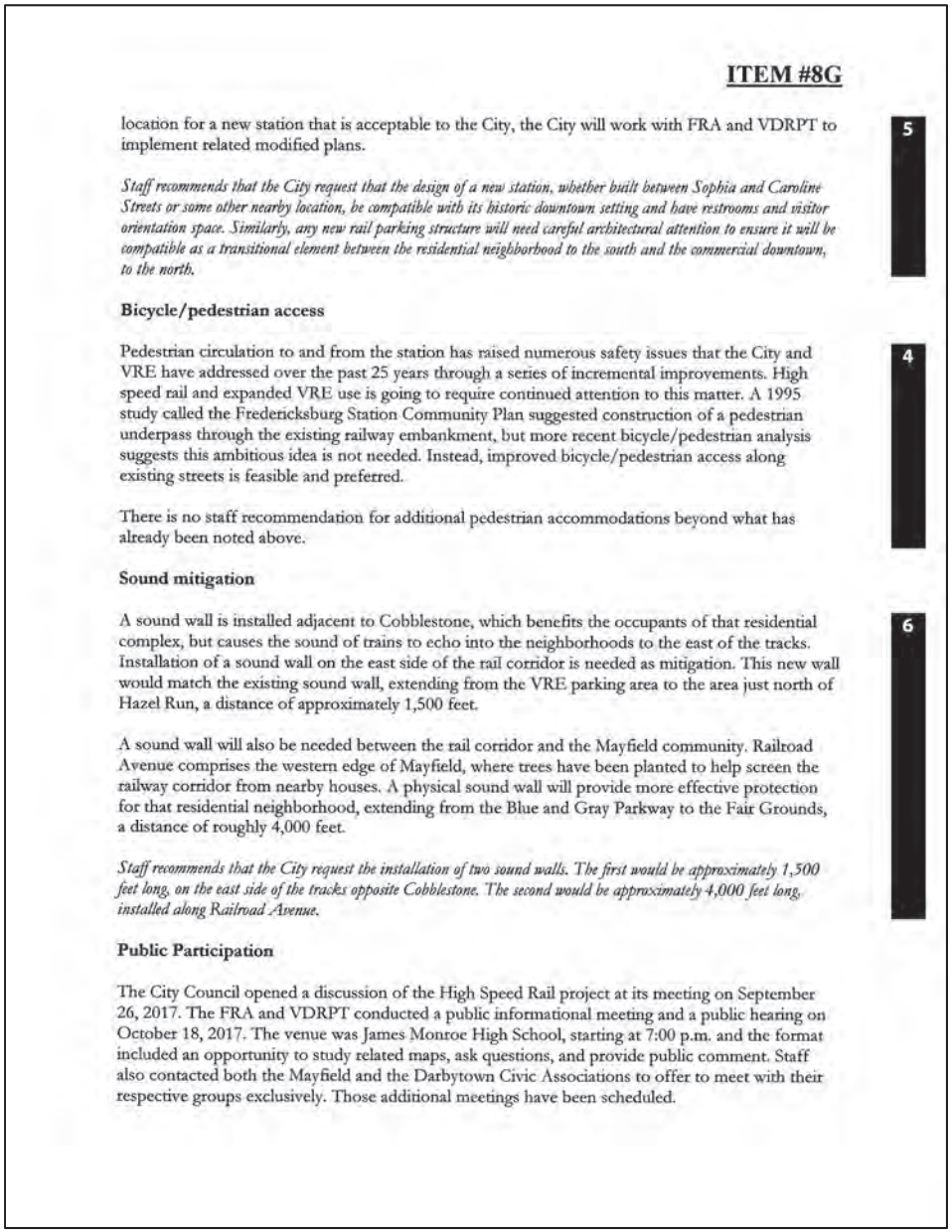
Station

5

The High Speed Rail project includes a new railway station, currently planned to be constructed between Sophia and Caroline Streets. The intent is to provide safe and convenient access to the elevated tracks as well as to re-establish a manned rail facility at Fredericksburg. The existing surface parking between Sophia and Caroline Streets is also proposed to be developed as structured parking. The existing elevator at the VRE platform, built by the City in 1992, will need to be de-activated and removed to accommodate the third rail. The retro-fitted freight elevator on the north side of the platform could also be de-activated, although the tower would be left in place as part of the historic station, which will not otherwise be affected by the project. If future planning reveals a better

CITY OF FREDERICKSBURG (continued)

(See DRPT-numbered statement #1. Responses to DRPT-numbered statements #3, #4, #5, and #6 provided on previous pages.)



ITEM #8G

location for a new station that is acceptable to the City, the City will work with FRA and VDRPT to implement related modified plans. 5

Staff recommends that the City request that the design of a new station, whether built between Sophia and Caroline Streets or some other nearby location, be compatible with its historic downtown setting and have restrooms and visitor orientation space. Similarly, any new rail parking structure will need careful architectural attention to ensure it will be compatible as a transitional element between the residential neighborhood to the south and the commercial downtown, to the north.

Bicycle/pedestrian access

Pedestrian circulation to and from the station has raised numerous safety issues that the City and VRE have addressed over the past 25 years through a series of incremental improvements. High speed rail and expanded VRE use is going to require continued attention to this matter. A 1995 study called the Fredericksburg Station Community Plan suggested construction of a pedestrian underpass through the existing railway embankment, but more recent bicycle/pedestrian analysis suggests this ambitious idea is not needed. Instead, improved bicycle/pedestrian access along existing streets is feasible and preferred. 4

There is no staff recommendation for additional pedestrian accommodations beyond what has already been noted above.

Sound mitigation

A sound wall is installed adjacent to Cobblestone, which benefits the occupants of that residential complex, but causes the sound of trains to echo into the neighborhoods to the east of the tracks. Installation of a sound wall on the east side of the rail corridor is needed as mitigation. This new wall would match the existing sound wall, extending from the VRE parking area to the area just north of Hazel Run, a distance of approximately 1,500 feet. 6

A sound wall will also be needed between the rail corridor and the Mayfield community. Railroad Avenue comprises the western edge of Mayfield, where trees have been planted to help screen the railway corridor from nearby houses. A physical sound wall will provide more effective protection for that residential neighborhood, extending from the Blue and Gray Parkway to the Fair Grounds, a distance of roughly 4,000 feet.

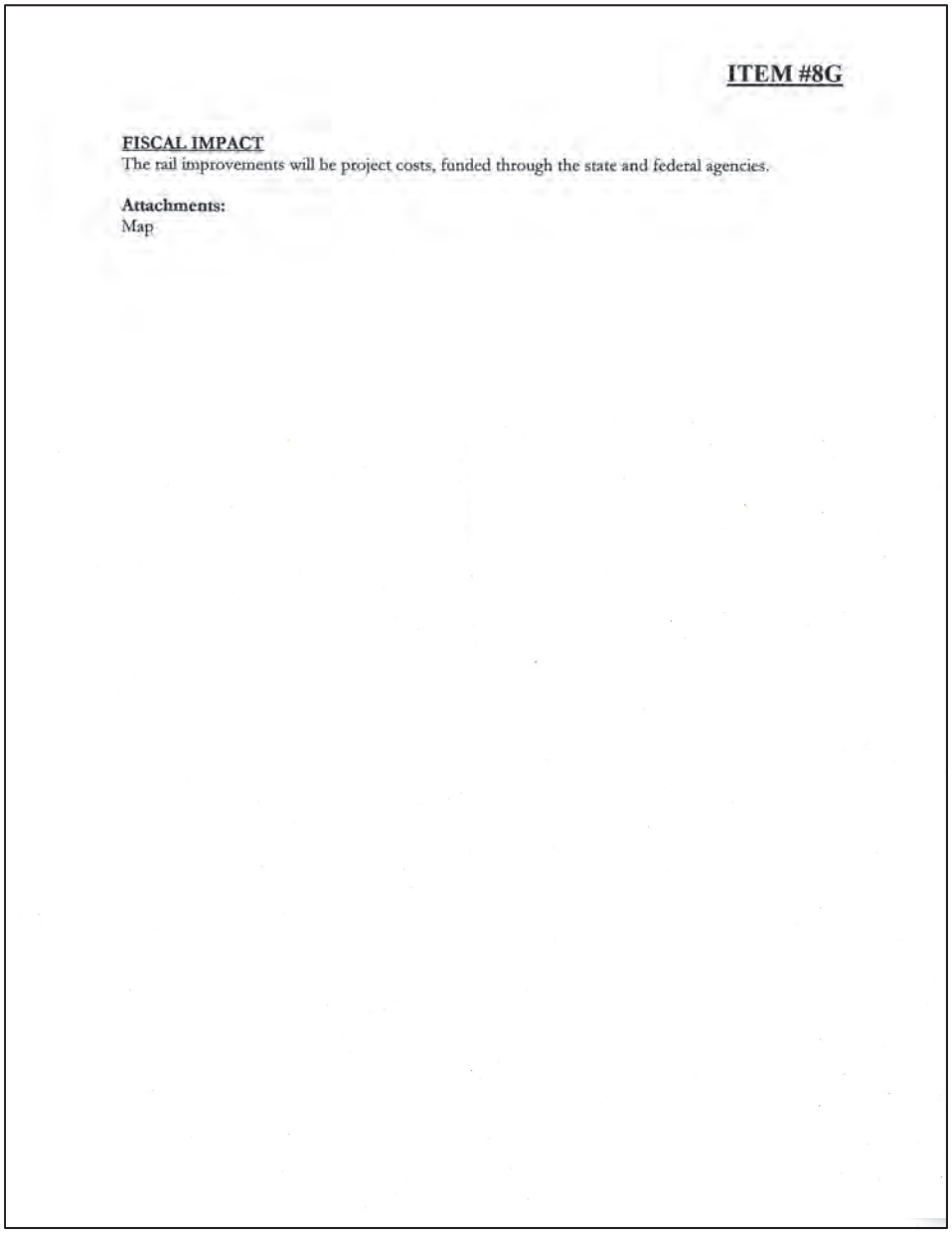
Staff recommends that the City request the installation of two sound walls. The first would be approximately 1,500 feet long, on the east side of the tracks opposite Cobblestone. The second would be approximately 4,000 feet long, installed along Railroad Avenue.

Public Participation

The City Council opened a discussion of the High Speed Rail project at its meeting on September 26, 2017. The FRA and VDRPT conducted a public informational meeting and a public hearing on October 18, 2017. The venue was James Monroe High School, starting at 7:00 p.m. and the format included an opportunity to study related maps, ask questions, and provide public comment. Staff also contacted both the Mayfield and the Darbytown Civic Associations to offer to meet with their respective groups exclusively. Those additional meetings have been scheduled.

CITY OF FREDERICKSBURG (continued)

(See DRPT-numbered statement #1. Responses to DRPT-numbered statements #3, #4, #5, and #6 provided on previous pages.)



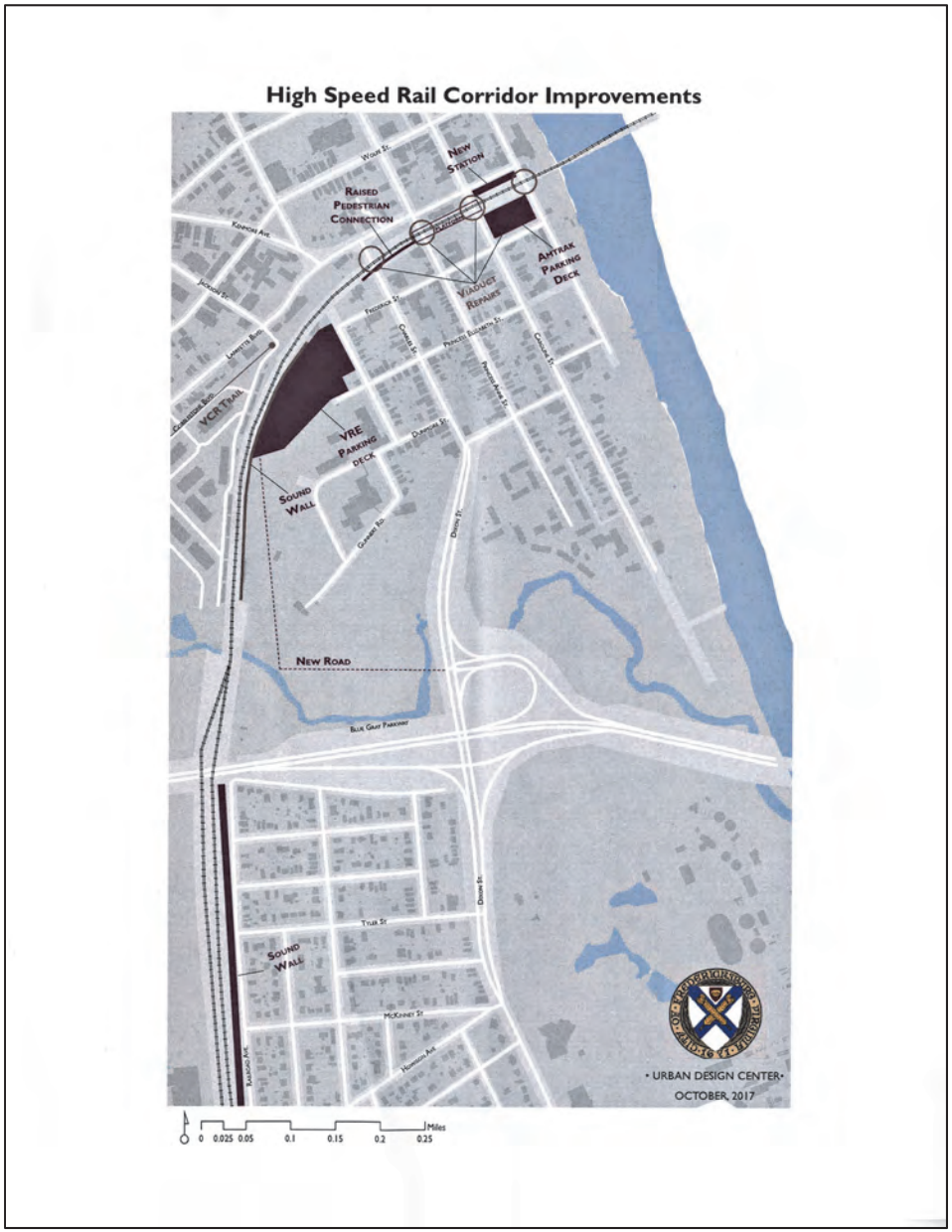
ITEM #8G

FISCAL IMPACT
The rail improvements will be project costs, funded through the state and federal agencies.

Attachments:
Map

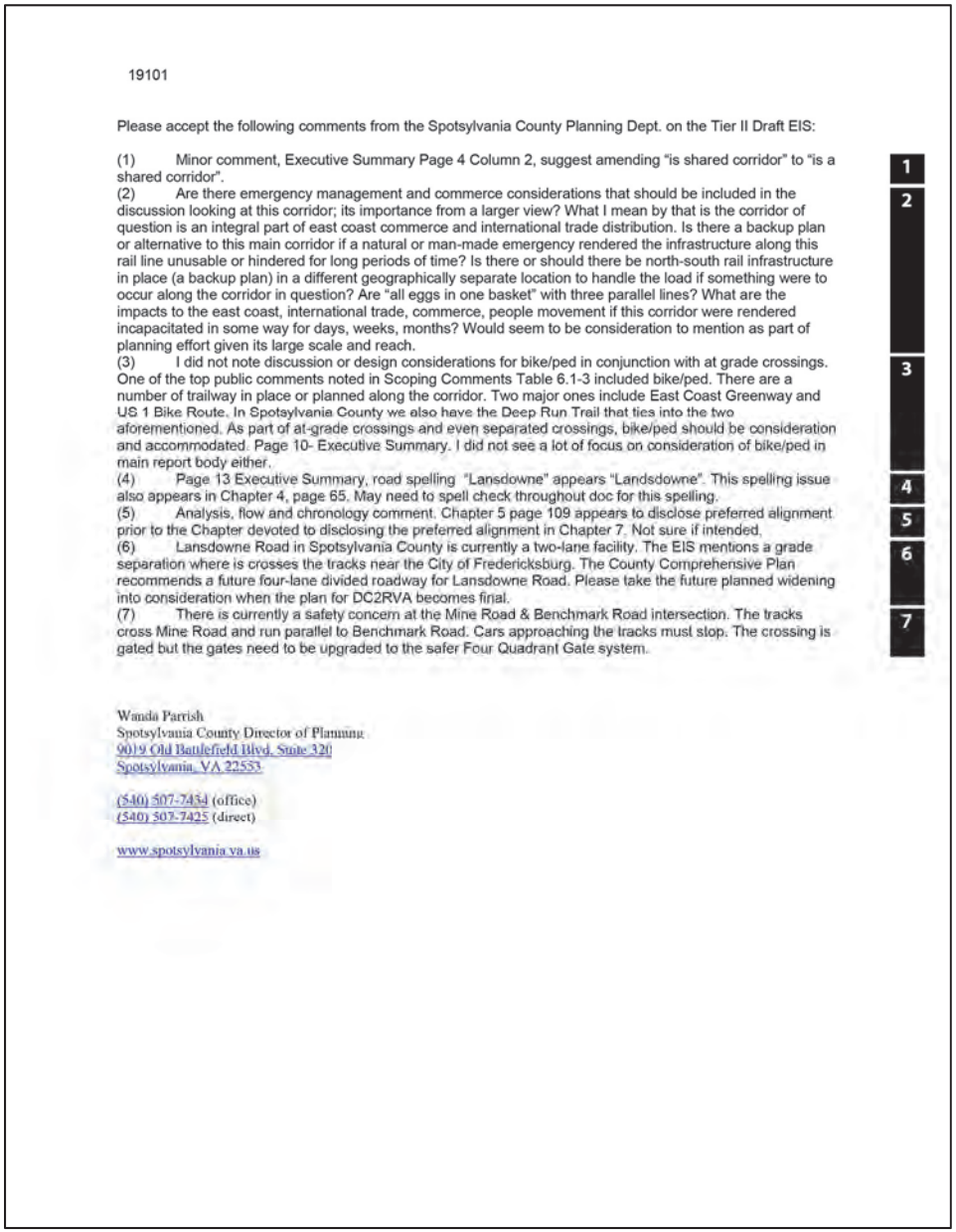
CITY OF FREDERICKSBURG (continued)

(No comments on this page)



CITY OF FREDERICKSBURG (continued)

(No comments on this page)



19101

Please accept the following comments from the Spotsylvania County Planning Dept. on the Tier II Draft EIS:

(1) Minor comment, Executive Summary Page 4 Column 2, suggest amending "is shared corridor" to "is a shared corridor". 1

(2) Are there emergency management and commerce considerations that should be included in the discussion looking at this corridor; its importance from a larger view? What I mean by that is the corridor of question is an integral part of east coast commerce and international trade distribution. Is there a backup plan or alternative to this main corridor if a natural or man-made emergency rendered the infrastructure along this rail line unusable or hindered for long periods of time? Is there or should there be north-south rail infrastructure in place (a backup plan) in a different geographically separate location to handle the load if something were to occur along the corridor in question? Are "all eggs in one basket" with three parallel lines? What are the impacts to the east coast, international trade, commerce, people movement if this corridor were rendered incapacitated in some way for days, weeks, months? Would seem to be consideration to mention as part of planning effort given its large scale and reach. 2

(3) I did not note discussion or design considerations for bike/ped in conjunction with at grade crossings. One of the top public comments noted in Scoping Comments Table 6.1-3 included bike/ped. There are a number of trailway in place or planned along the corridor. Two major ones include East Coast Greenway and US 1 Bike Route. In Spotsylvania County we also have the Deep Run Trail that ties into the two aforementioned. As part of at-grade crossings and even separated crossings, bike/ped should be consideration and accommodated. Page 10- Executive Summary. I did not see a lot of focus on consideration of bike/ped in main report body either. 3

(4) Page 13 Executive Summary, road spelling "Lansdowne" appears "Landsdowne". This spelling issue also appears in Chapter 4, page 65. May need to spell check throughout doc for this spelling. 4

(5) Analysis, flow and chronology comment. Chapter 5 page 109 appears to disclose preferred alignment prior to the Chapter devoted to disclosing the preferred alignment in Chapter 7. Not sure if intended. 5

(6) Lansdowne Road in Spotsylvania County is currently a two-lane facility. The EIS mentions a grade separation where is crosses the tracks near the City of Fredericksburg. The County Comprehensive Plan recommends a future four-lane divided roadway for Lansdowne Road. Please take the future planned widening into consideration when the plan for DC2RVA becomes final. 6

(7) There is currently a safety concern at the Mine Road & Benchmark Road intersection. The tracks cross Mine Road and run parallel to Benchmark Road. Cars approaching the tracks must stop. The crossing is gated but the gates need to be upgraded to the safer Four Quadrant Gate system. 7

Wanda Parrish
Spotsylvania County Director of Planning
9019 Old Battlefield Blvd, Suite 320
Spotsylvania, VA 22553

(540) 507-7434 (office)
(540) 507-7425 (direct)

www.spotsylvania.va.us

SPOTSYLVANIA COUNTY

1. The Department of Rail and Public Transportation (DRPT) notes the grammatical correction; however, the exact Draft Environmental Impact Statement (EIS) Executive Summary content is not reissued as part of the Final EIS.

2. The DC2RVA corridor is one component of the broader rail network serving the East Coast. The rail system is able to divert freight shipments to a different road or rail corridor when necessary, although the competing corridor may be longer and less efficient. Development of "backup" infrastructure to handle interrupted freight shipments due to an event that may temporarily incapacitate the rail line is beyond the scope, or the Purpose and the Need, of this Project.

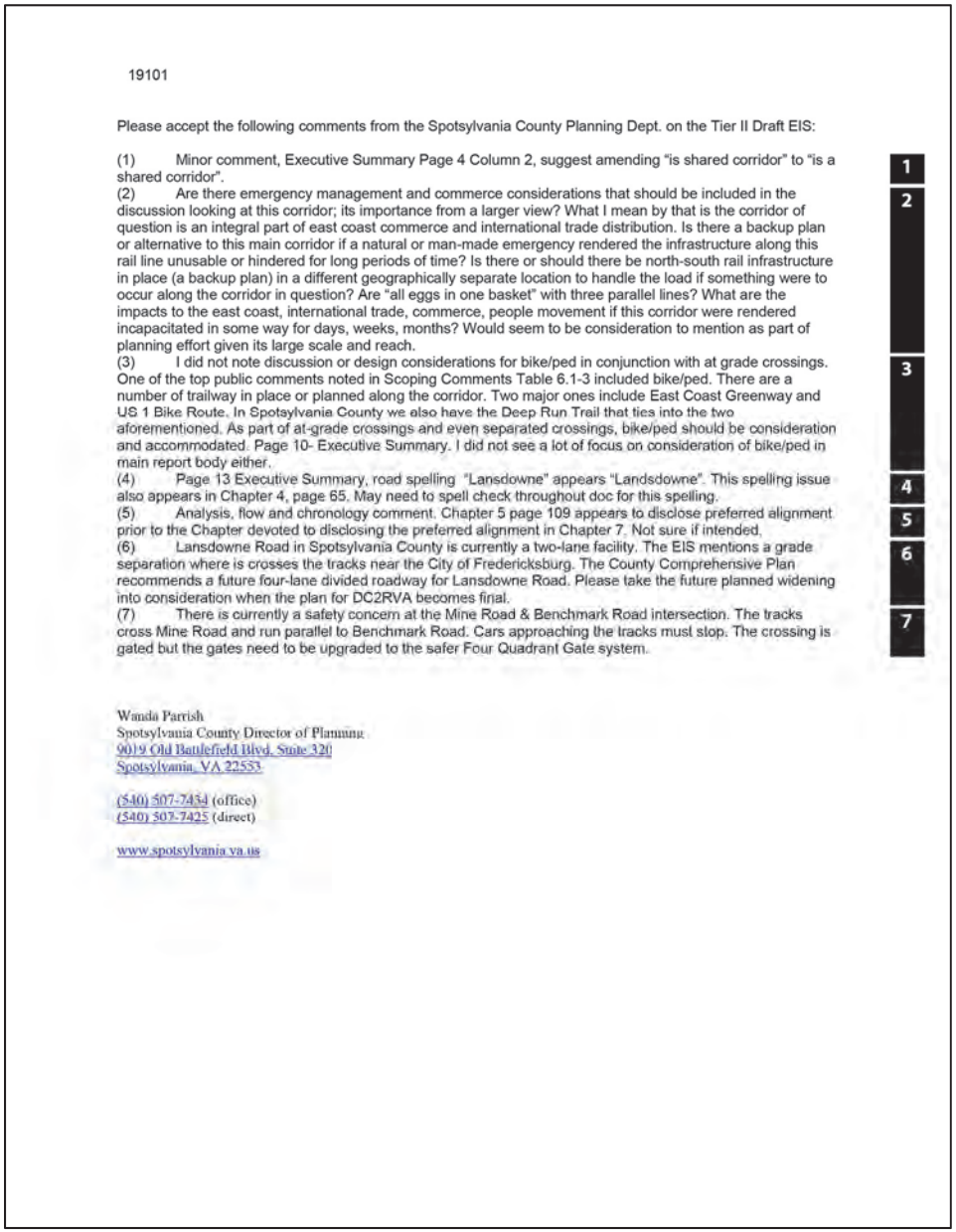
3. Expanded text on the treatment of existing bicycle and pedestrian facilities has been added to Section 5.18 of the Final EIS. Opportunities for additional bicycle and pedestrian accessibility improvements, including new and/or additional facilities to be compliant with the Americans with Disabilities Act (ADA), could be incorporated during final design, in coordination with FRA.

   The decision to establish a new bicycle and pedestrian greenway is a separate and distinct action from establishing high speed passenger rail service under the National Environmental Policy Act (NEPA), and is not part of the Purpose and Need of this Project. The referenced Deep Run Spur Trail, which is not yet built but would cross the existing 3-4 track right-of-way just north of Slaughter Pen Farm in Fredericksburg, would cross the same number of main tracks in the Preferred Alternative at this location. The DC2RVA Project will not add any additional tracks in this area, and current trail plans will not be affected.

4. The spelling of Lansdowne Road has been corrected in the Final EIS; refer to the errata table for the Draft EIS, which is included as Appendix A of the Final EIS.

5. Comment noted. The Final EIS is presented in chronological order.

(Responses are continued on next page)



19101

Please accept the following comments from the Spotsylvania County Planning Dept. on the Tier II Draft EIS:

(1) Minor comment, Executive Summary Page 4 Column 2, suggest amending "is shared corridor" to "is a shared corridor". 1

(2) Are there emergency management and commerce considerations that should be included in the discussion looking at this corridor; its importance from a larger view? What I mean by that is the corridor of question is an integral part of east coast commerce and international trade distribution. Is there a backup plan or alternative to this main corridor if a natural or man-made emergency rendered the infrastructure along this rail line unusable or hindered for long periods of time? Is there or should there be north-south rail infrastructure in place (a backup plan) in a different geographically separate location to handle the load if something were to occur along the corridor in question? Are "all eggs in one basket" with three parallel lines? What are the impacts to the east coast, international trade, commerce, people movement if this corridor were rendered incapacitated in some way for days, weeks, months? Would seem to be consideration to mention as part of planning effort given its large scale and reach. 2

(3) I did not note discussion or design considerations for bike/ped in conjunction with at grade crossings. One of the top public comments noted in Scoping Comments Table 6.1-3 included bike/ped. There are a number of trailway in place or planned along the corridor. Two major ones include East Coast Greenway and US 1 Bike Route. In Spotsylvania County we also have the Deep Run Trail that ties into the two aforementioned. As part of at-grade crossings and even separated crossings, bike/ped should be consideration and accommodated. Page 10- Executive Summary. I did not see a lot of focus on consideration of bike/ped in main report body either. 3

(4) Page 13 Executive Summary, road spelling "Lansdowne" appears "Landsdowne". This spelling issue also appears in Chapter 4, page 65. May need to spell check throughout doc for this spelling. 4

(5) Analysis, flow and chronology comment. Chapter 5 page 109 appears to disclose preferred alignment prior to the Chapter devoted to disclosing the preferred alignment in Chapter 7. Not sure if intended. 5

(6) Lansdowne Road in Spotsylvania County is currently a two-lane facility. The EIS mentions a grade separation where is crosses the tracks near the City of Fredericksburg. The County Comprehensive Plan recommends a future four-lane divided roadway for Lansdowne Road. Please take the future planned widening into consideration when the plan for DC2RVA becomes final. 6

(7) There is currently a safety concern at the Mine Road & Benchmark Road intersection. The tracks cross Mine Road and run parallel to Benchmark Road. Cars approaching the tracks must stop. The crossing is gated but the gates need to be upgraded to the safer Four Quadrant Gate system. 7

Wanda Parrish
Spotsylvania County Director of Planning
9019 Old Battlefield Blvd, Suite 320
Spotsylvania, VA 22553

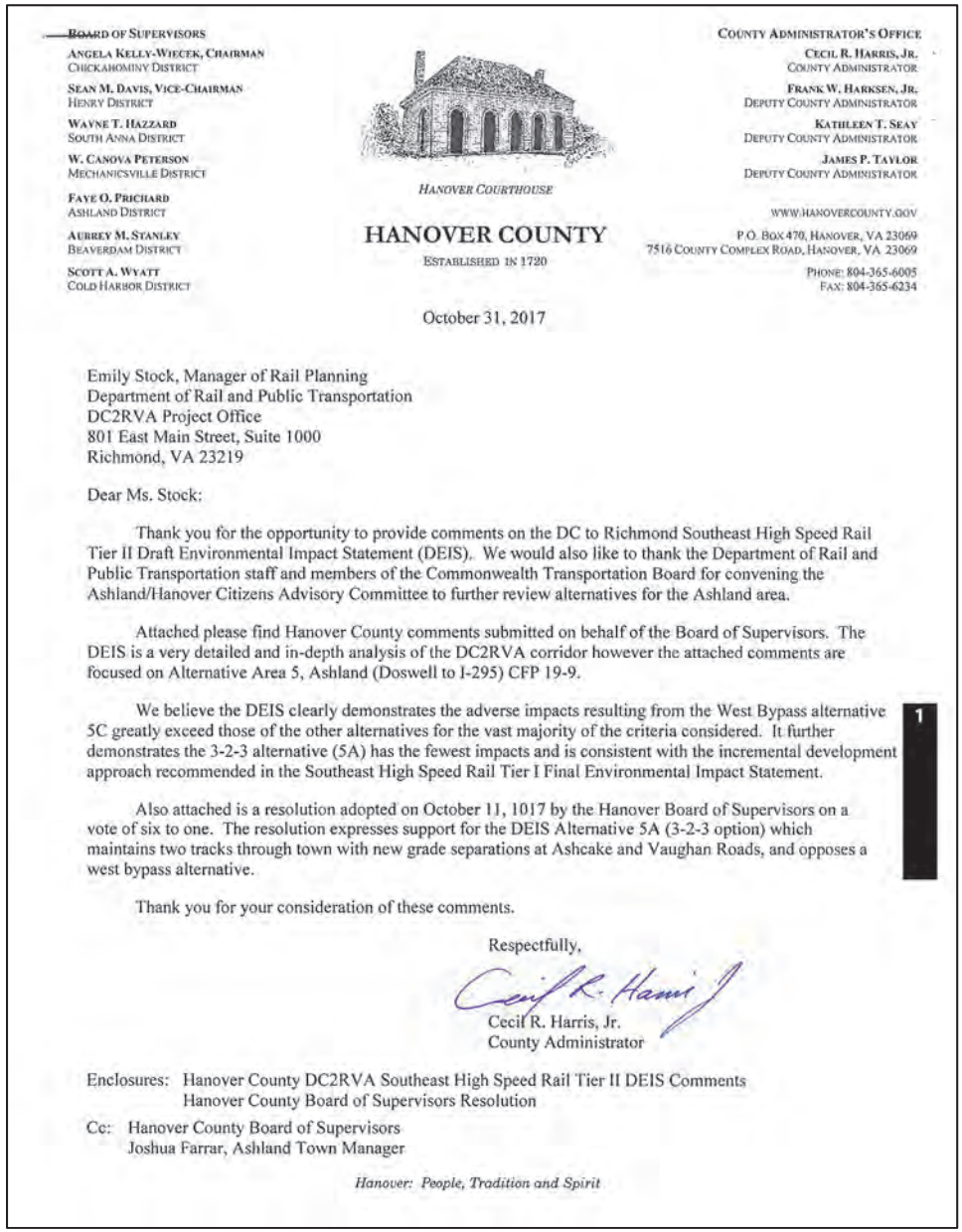
(540) 507-7434 (office)
(540) 507-7425 (direct)

www.spotsylvania.va.us

SPOTSYLVANIA COUNTY (continued)

6. Designs in support of the Draft and Final EIS were prepared at a conceptual level sufficient for assessing the impacts of the DC2RVA Project, which is approximately a 10% level of design (see the beginning of Chapter 4 of the Final EIS for details). While the expansion of Lansdowne Road to a four-lane facility is in the County's comprehensive plan as a possible improvement by 2030, there are no designs, concept plans, funding, or schedule in place to expand Lansdowne Road. Therefore, the conceptual design for the proposed grade separation of Lansdowne Road over the CSXT right-of-way reflects the two-lane roadway in place as of the completion of the DC2RVA Tier II EIS. Additionally, it is important to note that the Project is not anticipated to affect vehicle volumes or operations on Lansdowne Road. A future expansion of the roadway to four lanes is independent of the DC2RVA Project, and any impacts associated with expanding Lansdowne Road would be a result of that roadway widening project and not the DC2RVA Project. During future phases of design (see Section 7.5 of the Final EIS), DRPT will continue to coordinate with the County to incorporate the comprehensive plan's future roadway improvements in the DC2RVA design plans, as planned and funded at that time.

7. A four-quadrant gate system is the proposed crossing treatment at Mine Road as part of the Preferred Alternative for the Project, which is in line with the County's request in this comment. See Chapter 4 of the Final EIS for detailed descriptions of the Preferred Alternative, and Appendix L of the Final EIS, which provides an updated mapbook of the Preferred Alternative.



BOARD OF SUPERVISORS
ANGELA KELLY-WIECEK, CHAIRMAN
CHICKAHOMINY DISTRICT
SEAN M. DAVIS, VICE-CHAIRMAN
HENRY DISTRICT
WAYNE T. HAZZARD
SOUTH ANNA DISTRICT
W. CANOVA PETERSON
MECHANICSVILLE DISTRICT
FAYE O. PRICHARD
ASHLAND DISTRICT
AUBREY M. STANLEY
BEAVERDAM DISTRICT
SCOTT A. WYATT
COLD HARBOR DISTRICT

HANOVER COURTHOUSE

HANOVER COUNTY
ESTABLISHED IN 1720

COUNTY ADMINISTRATOR'S OFFICE
CECIL R. HARRIS, JR.
COUNTY ADMINISTRATOR
FRANK W. HARKSEN, JR.
DEPUTY COUNTY ADMINISTRATOR
KATHLEEN T. SEAY
DEPUTY COUNTY ADMINISTRATOR
JAMES P. TAYLOR
DEPUTY COUNTY ADMINISTRATOR

WWW.HANOVERCOUNTY.GOV
P.O. BOX 470, HANOVER, VA 23069
7516 COUNTY COMPLEX ROAD, HANOVER, VA 23069
PHONE: 804-365-6005
FAX: 804-365-6234

October 31, 2017

Emily Stock, Manager of Rail Planning
Department of Rail and Public Transportation
DC2RVA Project Office
801 East Main Street, Suite 1000
Richmond, VA 23219

Dear Ms. Stock:

Thank you for the opportunity to provide comments on the DC to Richmond Southeast High Speed Rail Tier II Draft Environmental Impact Statement (DEIS). We would also like to thank the Department of Rail and Public Transportation staff and members of the Commonwealth Transportation Board for convening the Ashland/Hanover Citizens Advisory Committee to further review alternatives for the Ashland area.

Attached please find Hanover County comments submitted on behalf of the Board of Supervisors. The DEIS is a very detailed and in-depth analysis of the DC2RVA corridor however the attached comments are focused on Alternative Area 5, Ashland (Doswell to I-295) CFP 19-9.

We believe the DEIS clearly demonstrates the adverse impacts resulting from the West Bypass alternative 5C greatly exceed those of the other alternatives for the vast majority of the criteria considered. It further demonstrates the 3-2-3 alternative (5A) has the fewest impacts and is consistent with the incremental development approach recommended in the Southeast High Speed Rail Tier I Final Environmental Impact Statement. 1

Also attached is a resolution adopted on October 11, 1017 by the Hanover Board of Supervisors on a vote of six to one. The resolution expresses support for the DEIS Alternative 5A (3-2-3 option) which maintains two tracks through town with new grade separations at Ashcake and Vaughan Roads, and opposes a west bypass alternative.

Thank you for your consideration of these comments.

Respectfully,

Cecil R. Harris, Jr.
County Administrator

Enclosures: Hanover County DC2RVA Southeast High Speed Rail Tier II DEIS Comments
Hanover County Board of Supervisors Resolution

Cc: Hanover County Board of Supervisors
Joshua Farrar, Ashland Town Manager

Hanover: People, Tradition and Spirit

HANOVER COUNTY

1. The Department of Rail and Public Transportation (DRPT) acknowledges the resolution adopted by the Hanover Board of Supervisors. In accordance with the September 2017 recommendation of the Town of Ashland/Hanover County Community Advisory Committee (CAC) and with the December 2017 resolution of the Commonwealth Transportation Board (CTB), Alternative 5A: Maintain Two Tracks Through Town was selected as the Preferred Alternative in the Final Environmental Impact Statement (EIS). Refer to Section 4.3.5 of the Final EIS for a description of the Preferred Alternative in this area and the basis for its selection. Further, DRPT, in accordance with the December 2017 Commonwealth Transportation Board resolutions, commits to working with the Town, the host railroad (CSXT), the Federal Railroad Administration (FRA), and other stakeholders to develop safety improvements for public road and pedestrian crossings in Ashland, separate from the DC2RVA Project.

Hanover County, Virginia
DC to Richmond Southeast High Speed Rail
Tier II Draft Environmental Impact Statement Comments

Hanover County appreciates the opportunity to provide comments on the DC2RVA Rail Draft Environmental Impact Statement (DEIS). The County thanks the Department of Rail and Public Transportation staff and members of the Commonwealth Transportation Board for convening the Ashland/Hanover Citizens Advisory Committee (CAC) to further review alternatives for the Ashland area.

These comments are focused on Alternative Area 5, Ashland (Doswell to I-295) CFP 19-9. The DEIS does not include a preferred alternative for the Ashland area because the work by the CAC was just getting underway at the time the draft was submitted to the Federal Railroad Administration. The DEIS does however include three primary possible Ashland alternatives with a variation for each (station location remains in current location or is moved to the vicinity of Ashcake Road). The three primary alternatives pursued in the DEIS are 1) the so called 3-2-3 alternative (5A) which maintains two tracks in Ashland, 2) the addition of a third at grade track in Ashland either to the east of the existing tracks or three tracks centered through Ashland (5B & 5D), and 3) a two track West Bypass (5C). The alternatives evaluated are shown in the table below.

Ashland (Doswell to I-295) CFP 19 – 9	5A	Maintain Two Tracks Through Town
	5A–Ashcake	Maintain Two Tracks Through Town (Relocate Station to Ashcake)
	5B	Add One Track East of Existing
	5B–Ashcake	Add One Track East of Existing (Relocate Station to Ashcake)
	5C	Add Two-Track West Bypass
	5C–Ashcake	Add Two-Track West Bypass (Relocate Station to Ashcake)
	5D–Ashcake	Three Tracks Centered Through Town (Add One Track, Relocate Station to Ashcake)

The CAC identified three least objectionable alternatives; the 3-2-3 alternative, a three-track trench through Ashland and a West Bypass corridor identified as AWB 1. West Bypass AWB 1 differs from the bypass included in the DEIS, which is further west. The DEIS does not advance a below grade Ashland alternative, but, as noted above, the CAC selected a below grade alternative as one of the least objectionable alternatives. 2

The DEIS goes into great detail quantifying the impacts of the Ashland alternatives. The report reveals that the adverse impacts resulting from the West Bypass alternative 5C would exceed those of the other alternatives for the vast majority of the criteria considered. The third track alternatives 5B and 5D also would have substantial impacts on existing residents, businesses and historic resources as well as to the character of Ashland. As such, the West Bypass (5C) and third track at grade alternatives (5B and 5D) should be removed from consideration. The 3-2-3 alternative (5A) has the fewest impacts and is consistent with the incremental development approach recommended in the Southeast High Speed Rail Tier I Final Environmental Impact Statement which states "*This approach minimizes the impacts to both the human and natural environments by utilizing the existing rail infrastructure and rail rights-of-way. By using existing infrastructure, the initial capital investment required by the system is also reduced*". 3

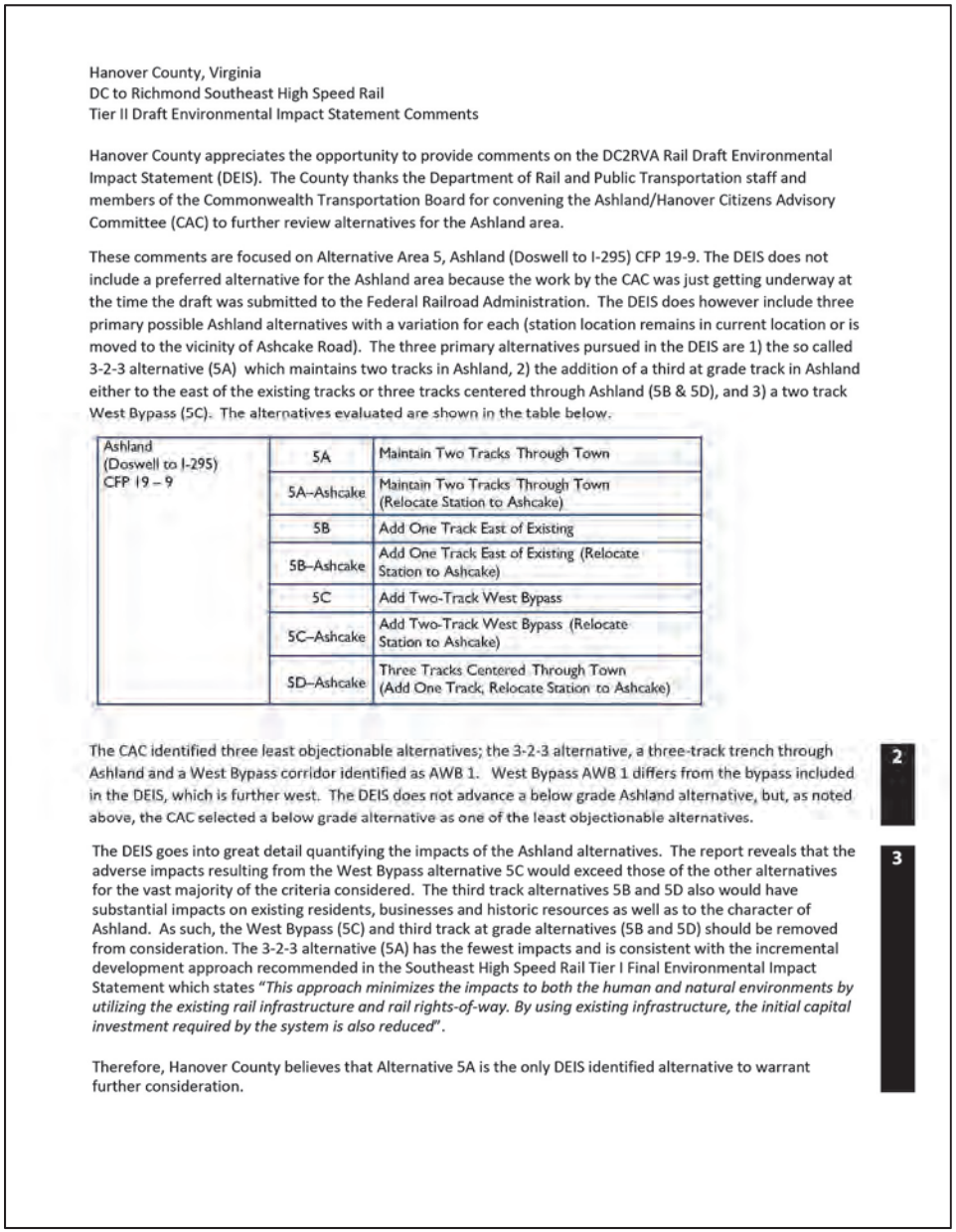
Therefore, Hanover County believes that Alternative 5A is the only DEIS identified alternative to warrant further consideration.

HANOVER COUNTY (continued)

2. As noted in DRPT-numbered statement #1 above, the CTB has recommended and the FRA has approved Alternative 5A (also known as "3-2-3" by the CAC) as the Preferred Alternative in the Final EIS. While DRPT recognized that the CAC selected a "least objectionable alternative" for each of the through-town, below-grade, and bypass alternatives, the alternative selected as the Preferred Alternative was Alternative 5A, which was the only CAC-identified alternative that had been carried through the alternatives screening process to the final alternatives selection phase, as described in the Draft EIS and its Alternatives Technical Report (Appendix A of the Draft EIS). The west bypass corridor, identified as AWB1, was evaluated during the early screening process and was dismissed for many of the same reasons as documented in the Draft EIS for Alternatives 5C and 5C-Ashcake. Similarly, below-grade alternatives were dismissed early in the screening process due to high costs, extended period of construction and associated disruption to downtown Ashland businesses, residences, and travelers. The recommendation and approval of Alternative 5A was attributed in part to the recommendations made by the CAC, which listed it as one of the three least objectionable alternatives considered. This was reinforced by the County Board of Supervisors recommendation for its support of Alternative 5A.

   Additionally, DRPT performed refined analysis of railroad operations through the DC2RVA Project corridor (see Section 3.2 of the Final EIS for details), including consideration of retaining a two-track railroad through the Town of Ashland. This refined operations analysis determined that while constructing a two-track western bypass or adding a third track to the existing CSXT railroad through the Town of Ashland would improve the efficiency of railroad operations through DC2RVA study Area 5, the additional capacity was not required to meet the Purpose and Need of the DC2RVA Project. Also, Alternative 5A (Maintain Two Tracks through Town) results in the least impacts to historic properties; per Section 4(f) of the US DOT Act of 1966, unless the use of such a property is determined to have a de minimis impact, FRA

(Responses are continued on next page)



Hanover County, Virginia
DC to Richmond Southeast High Speed Rail
Tier II Draft Environmental Impact Statement Comments

Hanover County appreciates the opportunity to provide comments on the DC2RVA Rail Draft Environmental Impact Statement (DEIS). The County thanks the Department of Rail and Public Transportation staff and members of the Commonwealth Transportation Board for convening the Ashland/Hanover Citizens Advisory Committee (CAC) to further review alternatives for the Ashland area.

These comments are focused on Alternative Area 5, Ashland (Doswell to I-295) CFP 19-9. The DEIS does not include a preferred alternative for the Ashland area because the work by the CAC was just getting underway at the time the draft was submitted to the Federal Railroad Administration. The DEIS does however include three primary possible Ashland alternatives with a variation for each (station location remains in current location or is moved to the vicinity of Ashcake Road). The three primary alternatives pursued in the DEIS are 1) the so called 3-2-3 alternative (5A) which maintains two tracks in Ashland, 2) the addition of a third at grade track in Ashland either to the east of the existing tracks or three tracks centered through Ashland (5B & 5D), and 3) a two track West Bypass (5C). The alternatives evaluated are shown in the table below.

Ashland (Doswell to I-295) CFP 19 – 9	5A	Maintain Two Tracks Through Town
	5A–Ashcake	Maintain Two Tracks Through Town (Relocate Station to Ashcake)
	5B	Add One Track East of Existing
	5B–Ashcake	Add One Track East of Existing (Relocate Station to Ashcake)
	5C	Add Two-Track West Bypass
	5C–Ashcake	Add Two-Track West Bypass (Relocate Station to Ashcake)
	5D–Ashcake	Three Tracks Centered Through Town (Add One Track, Relocate Station to Ashcake)

The CAC identified three least objectionable alternatives; the 3-2-3 alternative, a three-track trench through Ashland and a West Bypass corridor identified as AWB 1. West Bypass AWB 1 differs from the bypass included in the DEIS, which is further west. The DEIS does not advance a below grade Ashland alternative, but, as noted above, the CAC selected a below grade alternative as one of the least objectionable alternatives.

The DEIS goes into great detail quantifying the impacts of the Ashland alternatives. The report reveals that the adverse impacts resulting from the West Bypass alternative 5C would exceed those of the other alternatives for the vast majority of the criteria considered. The third track alternatives 5B and 5D also would have substantial impacts on existing residents, businesses and historic resources as well as to the character of Ashland. As such, the West Bypass (5C) and third track at grade alternatives (5B and 5D) should be removed from consideration. The 3-2-3 alternative (5A) has the fewest impacts and is consistent with the incremental development approach recommended in the Southeast High Speed Rail Tier I Final Environmental Impact Statement which states "*This approach minimizes the impacts to both the human and natural environments by utilizing the existing rail infrastructure and rail rights-of-way. By using existing infrastructure, the initial capital investment required by the system is also reduced*".

Therefore, Hanover County believes that Alternative 5A is the only DEIS identified alternative to warrant further consideration.

HANOVER COUNTY (continued)

must determine that no feasible and prudent avoidance alternative exists before approving the use of such land (see Chapter 6 of the Final EIS for further details).

3. The County's summation and comparison of potential impacts to the natural, cultural, and socioeconomic resources of the Ashland-Hanover County area are consistent with the evaluations prepared by DRPT that resulted in the recommendation and approval of Alternative 5A as the Preferred Alternative in the Final EIS. The Preferred Alternative was considered to be the least environmentally damaging of the Draft EIS Build Alternatives in Area 5 and as noted by the County, was consistent with the Project's Purpose and Need, including the incremental development approach recommended in the Tier I Final EIS and Record of Decision (ROD). Chapter 5 of the Final EIS details the environmental impacts of the Preferred Alternative, including the resources mentioned by the County, for the Project corridor. Impact values in this chapter have been updated with clarifications, as needed, since the publication of the Draft EIS.

Tier II Draft Environmental Impact Statement Comments

According to the DEIS, the environmental and transportation facilities impacts related to the West Bypass are far more significant than those resulting from the third at grade track through Ashland or the 3-2-3 alternative (Table 4.23-1: Summary of Impacts). Although the DEIS does not evaluate the trench alternative, it would be reasonable to presume a below grade alternative through Ashland would have less environmental and transportation impacts than the West Bypass or the at grade third track. 3

Although the stream resource effects of the various Ashland options are comparable, the wetland effects are almost negligible for the 3-2-3 and third at grade track alternatives. However, West Bypass alternative 5C permanently impacts almost 8.5 acres and temporarily impacts almost 3.5 acres of wetlands (Table 4.1-2). On the face of it, this alternative fails the avoidance and minimization test since the DEIS demonstrates there are other practicable alternatives with almost no wetland impacts.

Table 4.1-2: Wetland Effects (acres)

Area	Alternative	Total Wetland Effects
Area 5: Ashland (Doswell to I-295)	5A	P: 0.41 T: 1.48
	5A–Ashcake	P: 0.41 T: 1.48
	5B	P: 0.41 T: 1.53
	5B–Ashcake	P: 0.45 T: 1.50
	5C	P: 8.44 T: 3.47
	5C–Ashcake	P: 8.48 T: 3.47
	5D–Ashcake	P: 0.45 T: 1.51

The report specifies that in 1974, the *Safe Drinking Water Act* (SDWA) regulates the public drinking water supply. Amendments in 1986 and 1996 further protect the water supply by requiring actions that protect drinking water and its sources. The 1996 Amendments mandate that states assess, delineate, and map protection areas for their public drinking water sources and determine potential risks to those sources.

The DEIS notes that as a result of the 1996 SDWA amendments, Virginia adopted a 1-mile wellhead protection zone around all groundwater public sources (Zone 2). Zone 1 includes a 1,000-foot radius in which land use activities should be assessed for their potential to contaminate water supplies (Virginia DEQ, 2005). Whereas there is no impact to the Zone 1 or Zone 2 protection zone as a result of alternatives 5A, 5B or 5D; the West Bypass alternative 5C permanently affects 4.7 acres of the Zone 1 protection zone, between 44 and 46.5 acres of the Zone 2 protection area and 4200 square feet of private wells buffer areas (Table 4.1-3).

2 | Page

HANOVER COUNTY (continued)

(For response to comment 3, refer to page B-273)

Tier II Draft Environmental Impact Statement Comments

The Project falls within SDWA Zone 1 (5-mile radius) of the public surface water supply intakes for the Hanover Suburban Water System. The bypass alternative 5C permanently impacts over 31 acres of the Public Surface Water zone 1 protection area (Table 4.1-3).

3

Table 4.1-3: Estimated Area within Drinking Water Protection Zones

Area	Alternative	Public Surface Water Zone 1 (acres)	Public GroundWater Zone 1 (acres)	Public GroundWater Zone 2 (acres)	Private Wells 100 foot radius (square feet)	Private Wells 200 foot radius (square feet)
Area 5: Ashland (Doswell to I-295)	5A	P: 8.36 T: 6.08	–	P: 9.25 T: 5.52	–	P: 13,688 T: —
	5A–Ashcake	P: 8.36 T: 6.08	–	P: 11.59 T: 5.32	–	–
	5B	P: 8.36 T: 6.08	–	P: 9.33 T: 6.04	P: 609 –	P: 26,018 T: 138
	5B–Ashcake	P: 8.36 T: 6.08	–	P: 15.21 T: 6.65	P: 609 –	P: 15,411 T: 2,727
	5C	P: 31.06 T: 9.59	P: 4.70 T: 1.51	P: 44.09 T: 11.24	P: 4,205 T: 1,693	P: 19,098 T: 2,181
	5C–Ashcake	P: 31.06 T: 9.59	P: 4.70 T: 1.51	P: 46.53 T: 11.24	P: 4,205 T: 1,693	P: 5,410 T: 2,181
	5D–Ashcake	P: 8.36 T: 6.08	–	P: 16.12 T: 7.07	–	P: 17,321 T: 251

As stated in the DEIS, the *Farmland Protection Policy Act of 1981* (FPPA) established regulations to "minimize the extent to which Federal programs ... contribute to ... conversion of important farmland to nonagricultural uses, encourage alternative actions ... that could lessen adverse effects on farmland, and assure that Federal programs are ... compatible" with state, local, and private programs that protect farmland (7 CFR 658). NRCS has jurisdiction over the farmland program. As required by the FPPA, a corridor assessment score was calculated for the Ashland alternatives. The DEIS states that alternatives 5A, 5B and 5D have fairly low scores due to the locations along the existing CSXT rail line (scores of 46 to 52). However, the bypass alternative 5C has a score of 171 due to the adverse impact to the existing prime farmland and the Stanley Agricultural District (Table 4.3-1). This raw score, however, does not address the amount of farmland that is bisected by the bypass tracks and therefore becomes very impractical to farm due to the challenges of moving the farming equipment from one side of the tracks to the other with the limited number of rail crossings.

Noise has been discussed by many parties as a concern with all Ashland alternatives. The DEIS summarizes the extensive noise impact analysis performed including categorizing the various land uses. The analysis predicts that the impacts associated with the West Bypass 5C more than double the impacts related to the other alternatives. The high impact is the result of the fact that a West Bypass would change a rural environment which does not currently have trains to one that will have both freight and passenger train traffic (Table 4.7-3).

3 | Page

HANOVER COUNTY (continued)

(For response to comment 3, refer to page B-273)

HANOVER COUNTY (continued)

(For response to comment 3, refer to page B-273)

3

The DEIS reports the vibration impacts for the Build Alternatives in the Ashland area range from 26 (3-2-3 alternative) to 36 for the West Bypass alternative 5C (Table 4.7-7). These impacts are based on the assumption that passenger trains are operating at 90 mph through Ashland. The DEIS clarifies that, in reality, trains would slow down through town, even if they are not stopping at the station. At this point, the tabulation of vibration impacts within Ashland is a conservative overestimate. The addition of freight traffic on the proposed bypass alignment is the primary source of vibration impacts for West Bypass alternative 5C.

The narrative section of the DEIS addressing aesthetics and the visual environment (Chapter 4.9) goes into a good amount of detail. The key take away is that the West Bypass (5C) would result in a major change in the visual landscape. The six proposed highway-rail grade separations would be highly visible, and several residences would experience major changes in their viewshed resulting in a high visual impact. The construction of the West Bypass is also in conflict with the County's Comprehensive Plan.

The aesthetics and visual environment impacts relate to the community effects (Chapter 4.11). Therefore, it is important to highlight the DEIS narrative detailing community effects which states that the West Bypass (5C) would result in 20 residential relocations, 1 community facility relocation (Calvary Pentecostal Tabernacle and camp), 2 commercial relocations, and partial acquisition of more than 50 parcels. The selection of the West Bypass would put a cloud over all of these, and the effect would be immediate. The cloud would affect the use and enjoyment of these properties, the ability to sell the properties and along the sales prices.

The narrative above from Section 4.11.2.1 states West Bypass 5C results in 20 residential relocations, although Table 4.23-1 indicates alternative 5C results in 21 residential relocations. However, the County's review of the plans shows the number will likely be higher, perhaps 30 developed residential properties are directly impacted. The bypass will also require the acquisition of almost 150 acres of additional right-of-way. It is important to clarify the difference between property zoning classification and the actual use of the property. It has been noted by some there is only one residential property impacted by the West Bypass. That single impact is a property zoned residential (R). Agriculturally zoned property (A) also supports and allows residential use. The Agriculturally zoned property is where the majority of the existing affected residences are located.

Regarding potential historic resources (Chapter 4.13), the third track alternatives (5B and 5D) are shown to potentially adversely affect six *buildings, structures, objects or districts* that are either list or potentially eligible to be listed on the NRHP. This number excludes the impact to the RF&P rail corridor, which is essentially impacted by every alternative along the entire corridor between Richmond Main Street Station and Washington D.C. The impacts on the Berkleytown Historic District (166-5073), Ashland Historic District (166-0001), Randolph-Macon Historic District (166-0002), and Randolph-Macon Historic District Expansion (166-5072) are due to disturbances to the setting, feeling, and design of the district. The MacMurdo House (166-0036) impact is the result of moving the existing sidewalks and roadways closer to the historic dwelling and onto the parcel boundaries, thus impacting the resource's integrity of design, setting, feeling, and association and modifying key visual elements of the building. The impact to the Ashland Station Depot (166-001-0008) range from track changes and building alterations to potential demolition under alternative 5D (three tracks centered). The Ashland three track alternatives therefore potentially have a larger impact on historic resources than a Western Bypass, but the majority of the impacts are related to the setting, feeling and design of the district.

Chapter 4.15 discusses transportation impacts. There has been much discussion regarding the perceived significant increase in the total daily vehicle delay in Ashland resulting from Alternatives 5A, 5B and 5D. However, Table 4.15-13 shows that the projected 2025 overall total daily vehicle delay impact in Ashland decreases between 24% and 26% due primarily to the two grade separations included in those alternatives. It is

Tier II Draft Environmental Impact Statement Comments

noted however that the England Street / Thompson Street crossing remains at-grade and experiences a 12% increase over the no build delay in 2025. The DEIS reports: "*The England Street / Thompson Street crossing exceeds the 40-hour FHWA threshold in two of the build alternatives that pass through the Town of Ashland (Build Alternatives 5A and 5B with 41.85 total daily hours). The total daily delay at this crossing is 37.37 hours under No Build conditions*". It appears that this delay is based upon an assumption that driving habits will not change after the new grade separation improvements are constructed. It seems more likely that drivers will take advantage of the new grade separated crossings in order to avoid the England Street / Thompson Street crossing which would in turn reduce the England Street / Thompson Street total daily vehicle delay. More importantly, the construction of grade separated crossings at Vaughn and Ashcake roads would facilitate the movement of public safety equipment and personnel from one side of the tracks to the other. The Western Bypass would leave unresolved the existing issue regarding the movement of public safety vehicles across the tracks in Ashland. 3

The DEIS discusses additional impacts ranging from loss of conservation areas and wildlife habitat to road closures and road network alterations. The adverse effects of these items are greatest for the West Bypass alternative (5C) as are many of the additional impacts noted in the report.

Bypass alternative 5C also has the greatest capital cost ($600 million), and clearly the operational costs of all the new track and grade separated crossings will be more costly. The capital cost comparison is shown in the table below.

Alternative Area	Build Alternative	Capital Cost (2025 $ - millions)
Area 5: Ashland (Doswell to I-295)	5A: Maintain Two Tracks Through Town (850-Foot Platforms)	$349.5
	5A–Ashcake: Maintain Two Tracks Through Town (Relocate Station to Ashcake)	$350.3
	5B: Add One Track Through Town East of Existing (850-Foot Platforms)	$388.3
	5B–Ashcake: Add One Track Through Town East of Existing (Relocate Station to Ashcake)	$388.8
	5C: Add Two-Track West Bypass (850-Foot Platforms)	$599.2
	5C–Ashcake: Add Two-Track West Bypass (Relocate Station	$600.0
	5D–Ashcake: Three Tracks Centered Through Town (Add One Track, Relocate Station to Ashcake)	$398.8

In conclusion, the West Bypass Alternative 5C has the greatest adverse impact on a majority of the criteria evaluated for the DEIS, and the highest cost. It is recognized the third track alternatives 5B and 5D do have qualitative impacts on existing residents, businesses and historic resources as well as arguably to the character of Ashland. As such, the West Bypass (5C) and third track at grade alternatives (5B and 5D) should be removed

5 | Page

HANOVER COUNTY (continued)

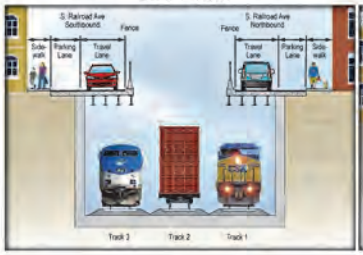
(For response to comment 3, refer to page B-273)

Tier II Draft Environmental Impact Statement Comments

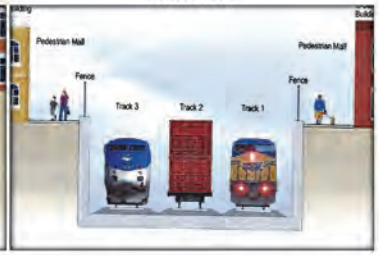
from consideration. The 3-2-3 alternative (5A) has the fewest impacts and is consistent with the incremental development approach recommended in the Southeast High Speed Rail Tier I Final Environmental Impact Statement and therefore is the only alternative that warrants further consideration. 3

In addition to the comments on the DEIS please accept these additional comments related to the CAC selected least objectionable alternatives that were not included in the DEIS. One least objectionable alternative is a three-track trench through Ashland. The concept of a trench was discussed in 2015 but was different from the trench presented to the CAC. The 2015 trench was removed from consideration and was not included in the screening process therefore it is not addressed in the DEIS. 4

2017 Version



2015 Version



Considering all the adverse impacts associated with the Ashland bypass and third at grade track alternatives perhaps in the future a more thorough analysis of the trench presented to the CAC and selected as one of the least objectionable alternatives is warranted. This additional analysis can include other below grade alternatives as well if warranted. A below grade option would minimize the environmental consequences of the third track through Ashland.

6 | Page

HANOVER COUNTY (continued)

(For response to comment 3, refer to page B-273)

4. A range of below-grade options, including various types of tunnels and trench structures, were considered during the initial alternatives development process, as summarized in Chapter 2 of the Draft EIS and the Alternatives Technical Report (Appendix A of the Draft EIS). As noted in DRPT-statement #2 above, these below-grade options were dismissed due to their higher construction costs, longer construction periods and inherent disruption to local businesses, residences and travelers. Additional open trench options were considered during the CAC sessions; however, for the reasons noted previously, these options were ultimately not considered to be as viable and environmentally less damaging than the "3-2-3" alternative (i.e., Alternative 5A) by the CAC.

VIRGINIA: At a regular meeting of the Board of Supervisors for Hanover County held in the Boardroom of the Hanover County Administration Building on the 11th day of October 2017, at 3:00 p.m.

Present: Mrs. Angela Kelly-Wiecek, Chairwoman
Mr. Sean M. Davis, Vice-Chairman
Mr. Wayne T. Hazzard
Mr. W. Canova Peterson
Ms. Faye O. Prichard
Mr. Scott A. Wyatt
Mr. Aubrey M. Stanley

RESOLUTION OF THE HANOVER COUNTY BOARD OF SUPERVISORS REGARDING PROPOSED WASHINGTON, D.C., TO RICHMOND, VIRGINIA, RAIL IMPROVEMENTS

On November 28, 2016, the Board of Supervisors adopted a resolution requesting that the Virginia Department of Rail and Public Transportation (DRPT) and the Federal Railroad Administration (FRA) abandon consideration of any western bypass around the Town of Ashland and also abandon consideration of constructing a third track at grade through the Ashland.

The Board of Supervisors also encouraged DRPT to engage collaboratively with representatives of the Hanover and Ashland to find an option, or combination of options, that would achieve the goals of the DC2RVA Project while minimizing the impact on residents, businesses and institutions and preserving the historic character and economic vitality of the Hanover and the Ashland.

In the spring of this year, DRPT established the Citizens' Advisory Committee (Committee) comprised of representatives of Hanover, Ashland, Randolph Macon College and CSX, and the Committee, with expertise and detailed information provided by DRPT, has engaged in an exhaustive analysis of every conceivable alternative for achieving the goals of the DC2RVA Project for the portion located in Hanover.

HANOVER COUNTY (continued)

(No comments on this page)

The information reviewed by the Committee and DRPT reinforced the fact that a third track constructed at grade through Ashland would (1) dramatically impact the economic vitality and character of the Town and severely restrict vehicular and pedestrian access for many of the existing homes and businesses on Center Street in the heart of town, (2) restrict access to Randolph Macon College and substantially diminish the quality of its campus and (3) impose additional restrictions on vehicles and pedestrians moving in the east-west corridors through the Ashland.

The information reviewed by the Committee also demonstrated that even the western bypass corridor route with the least impact would nonetheless permanently diminish the rural character of a historic and agriculturally significant portion of Hanover and that the corridor would cross at least 81 parcels, require the destruction of more than 20 existing homes and impose substantial access, noise, visual and vibration impacts on properties in the vicinity of the corridor.

Each of the alternatives evaluated by the Committee involving the construction of a third track through Ashland in a tunnel would be prohibitively expensive, and building three tracks through Ashland in a trench would require a protracted and very disruptive period of construction.

The Tier II Draft Environmental Impact Statement (EIS) identifies the continued use of two main tracks through Ashland, with one additional track eventually being constructed to the north and south of Ashland, together with the construction of grade separated crossings at Vaughan Road and Ashcake Road, as a viable method for meeting the DC2RVA Project's service and performance goals. This is called the "3-2-3 Alternative".

HANOVER COUNTY (continued)

(No comments on this page)

The draft Tier II EIS clearly demonstrates that the 3-2-3 Alternative would have far fewer impacts on environmental resources, agricultural resources, residences and commercial buildings than any of the other alternatives and would subject far fewer people to noise, vibration and visual impacts than any of the other alternatives.

The 3-2-3 Alternative is fully consistent with the "incremental approach" specified in the Tier I Environmental Impact Statement adopted in 2002 which calls for improvements to be made in existing corridors and only when, and if, needed and funding is available. The ongoing revolution in transportation technology makes uncertain any prediction of whether and when rail enhancements in the DC2RVA corridor will be needed and funding will be provided.

All of the other proposed alternatives, other than 3-2-3, would place a cloud of uncertainty on the properties that would have to be acquired and the homes that would have to be demolished for a by-pass. The same cloud would be imposed on the properties in the Town that would be subjected to the prolonged construction periods required for a trench, tunnel or third track at grade and the permanent impacts that would continue after construction. This uncertainty would persist for as long as any of the other alternatives is part of the plans for the DC2RVA Project, even if it is never needed or built.

The 3-2-3 Alternative is the only viable alternative that does not threaten the future viability and existence of homes, businesses and farms located in Hanover, and it poses a less immediate threat to the homes and businesses in Ashland.

NOW, THEREFORE, BE IT RESOLVED by the Hanover County Board of Supervisors to request that the Virginia Department of Rail and Public Transportation, the Commonwealth Transportation Board and the Federal Railway Administration adopt the 3-2-3 Alternative as the means of achieving the DC2RVA Project goals for that portion of the corridor lying within

HANOVER COUNTY (continued)

(No comments on this page)

Hanover County and that the DRPT continue to look for opportunities to mitigate the traffic impacts of that option.

On motion of Mr. Stanley, seconded by Mr. Hazzard, the members of the Board of Supervisors voted to this resolution as follows:

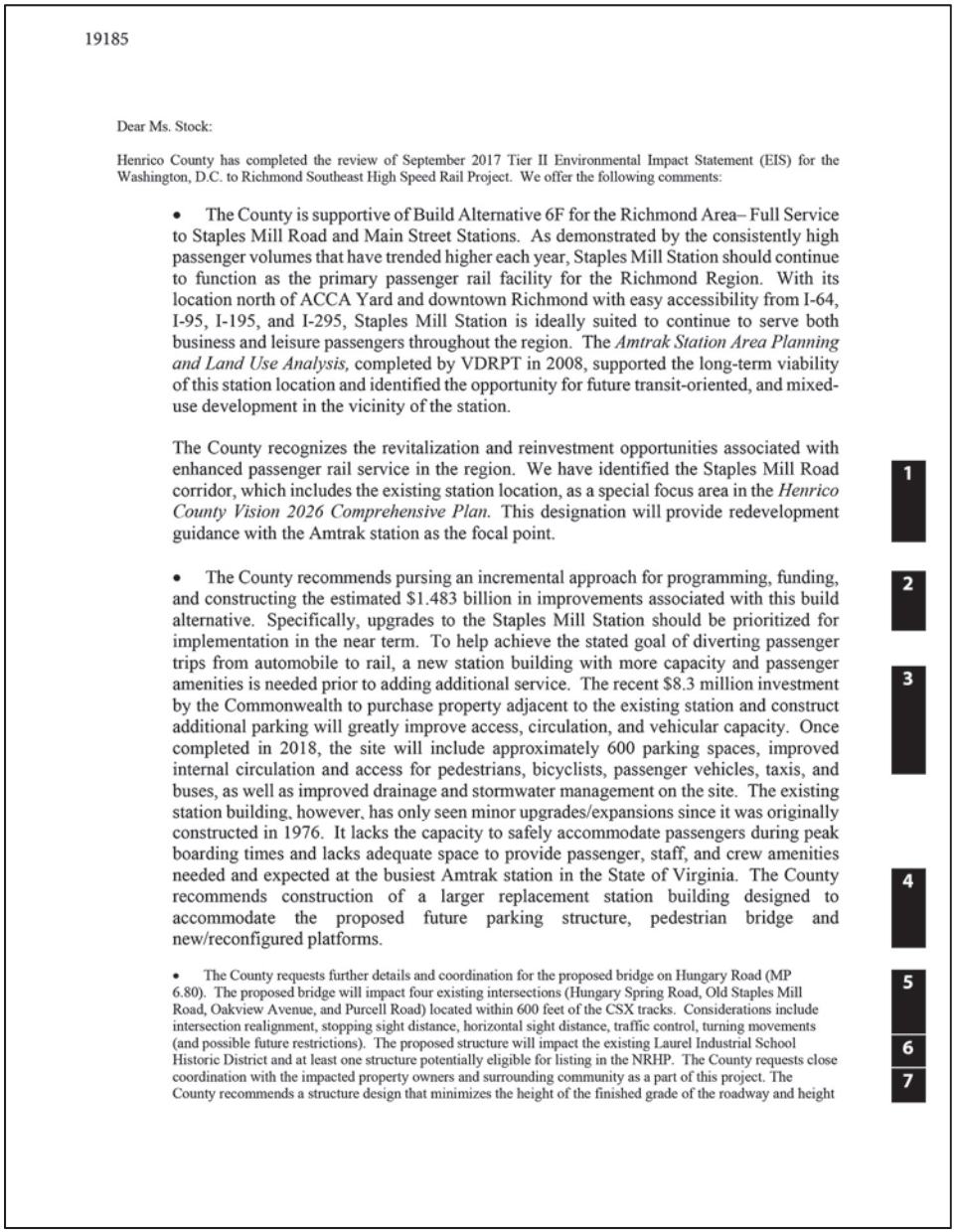
	Vote:
Angela Kelly-Wiecek	Aye
Sean M. Davis	Aye
Wayne T. Hazzard	Aye
W. Canova Peterson	Aye
Faye O. Prichard	No
Aubrey M. Stanley	Aye
Scott A. Wyatt	Aye

Dated: October 12, 2017

Cecil R. Harris, Jr., County Administrator
Clerk, Hanover County Board of Supervisors

HANOVER COUNTY (continued)

(No comments on this page)



19185

Dear Ms. Stock:

Henrico County has completed the review of September 2017 Tier II Environmental Impact Statement (EIS) for the Washington, D.C. to Richmond Southeast High Speed Rail Project. We offer the following comments:

- The County is supportive of Build Alternative 6F for the Richmond Area– Full Service to Staples Mill Road and Main Street Stations. As demonstrated by the consistently high passenger volumes that have trended higher each year, Staples Mill Station should continue to function as the primary passenger rail facility for the Richmond Region. With its location north of ACCA Yard and downtown Richmond with easy accessibility from I-64, I-95, I-195, and I-295, Staples Mill Station is ideally suited to continue to serve both business and leisure passengers throughout the region. The *Amtrak Station Area Planning and Land Use Analysis,* completed by VDRPT in 2008, supported the long-term viability of this station location and identified the opportunity for future transit-oriented, and mixed-use development in the vicinity of the station.

The County recognizes the revitalization and reinvestment opportunities associated with enhanced passenger rail service in the region. We have identified the Staples Mill Road corridor, which includes the existing station location, as a special focus area in the *Henrico County Vision 2026 Comprehensive Plan.* This designation will provide redevelopment guidance with the Amtrak station as the focal point. 1

- The County recommends pursing an incremental approach for programming, funding, and constructing the estimated $1.483 billion in improvements associated with this build alternative. Specifically, upgrades to the Staples Mill Station should be prioritized for implementation in the near term. To help achieve the stated goal of diverting passenger trips from automobile to rail, a new station building with more capacity and passenger amenities is needed prior to adding additional service. The recent $8.3 million investment by the Commonwealth to purchase property adjacent to the existing station and construct additional parking will greatly improve access, circulation, and vehicular capacity. Once completed in 2018, the site will include approximately 600 parking spaces, improved internal circulation and access for pedestrians, bicyclists, passenger vehicles, taxis, and buses, as well as improved drainage and stormwater management on the site. The existing station building, however, has only seen minor upgrades/expansions since it was originally constructed in 1976. It lacks the capacity to safely accommodate passengers during peak boarding times and lacks adequate space to provide passenger, staff, and crew amenities needed and expected at the busiest Amtrak station in the State of Virginia. The County recommends construction of a larger replacement station building designed to accommodate the proposed future parking structure, pedestrian bridge and new/reconfigured platforms. 2 3 4

- The County requests further details and coordination for the proposed bridge on Hungary Road (MP 6.80). The proposed bridge will impact four existing intersections (Hungary Spring Road, Old Staples Mill Road, Oakview Avenue, and Purcell Road) located within 600 feet of the CSX tracks. Considerations include intersection realignment, stopping sight distance, horizontal sight distance, traffic control, turning movements (and possible future restrictions). The proposed structure will impact the existing Laurel Industrial School Historic District and at least one structure potentially eligible for listing in the NRHP. The County requests close coordination with the impacted property owners and surrounding community as a part of this project. The County recommends a structure design that minimizes the height of the finished grade of the roadway and height 5 6 7

HENRICO COUNTY

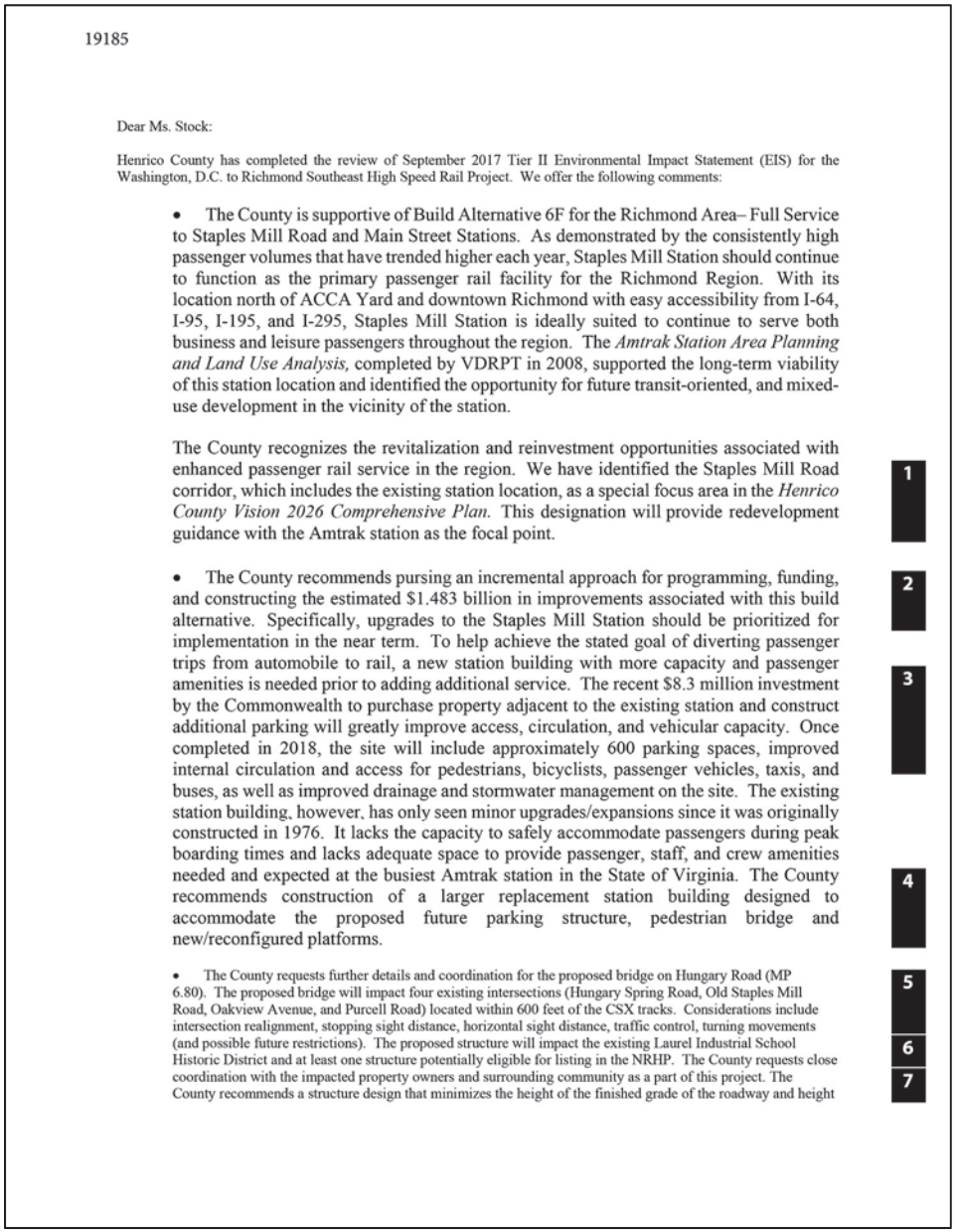
1. Comment noted. Staples Mill Road Station and its location within Henrico County as it relates to transportation and comprehensive planning is discussed in Section 3.11.3 of the Draft EIS. Alternative 6F was selected as the Preferred Alternative for the Richmond Area, which includes service to and improvements at Staples Mill Road Station.

2. DRPT anticipates that the DC2RVA Project will be implemented incrementally, based on identified priorities for track capacity projects, as funding becomes available. DRPT anticipates that funding for the Project will come from multiple sources, including federal, state, and local funds, plus passenger fare revenue recovery and private sector sources. These next steps in the Project (funding, priorities, and the incremental approach, as well as details on final design, permitting, and construction) are summarized in Chapter 7 of the Final EIS, which has been added since the Draft EIS

3 and 4. At Staples Mill Road Station in Henrico County, the Preferred Alternative for the Richmond area (Alternative 6F: Full Service, Staples Mill Road/Main Street Stations) recommends: removing existing platforms and constructing two new 1,200-foot level-boarding island platforms (top elevation 48" above top of rail) on the east side of the right-of-way opposite the existing station building; constructing a pedestrian bridge with an elevator and stairs to access the platforms; and replacing the existing station building with an approximately 10,400 square foot two-story building. The Final EIS reflects the expansion of the existing parking lot at Staples Mill Road Station by DRPT, Amtrak, and VDOT in June 2018; see Section 4.3.6 of the Final EIS.

   Refer to DRPT-numbered statement #2 for response on funding and implementation. This does not preclude upgrading Staples Mill Road Station independently of the DC2RVA Project, should federal, state, local, or other funding become available.

(Responses are continued on next page)



19185

Dear Ms. Stock:

Henrico County has completed the review of September 2017 Tier II Environmental Impact Statement (EIS) for the Washington, D.C. to Richmond Southeast High Speed Rail Project. We offer the following comments:

- The County is supportive of Build Alternative 6F for the Richmond Area– Full Service to Staples Mill Road and Main Street Stations. As demonstrated by the consistently high passenger volumes that have trended higher each year, Staples Mill Station should continue to function as the primary passenger rail facility for the Richmond Region. With its location north of ACCA Yard and downtown Richmond with easy accessibility from I-64, I-95, I-195, and I-295, Staples Mill Station is ideally suited to continue to serve both business and leisure passengers throughout the region. The *Amtrak Station Area Planning and Land Use Analysis,* completed by VDRPT in 2008, supported the long-term viability of this station location and identified the opportunity for future transit-oriented, and mixed-use development in the vicinity of the station.

The County recognizes the revitalization and reinvestment opportunities associated with enhanced passenger rail service in the region. We have identified the Staples Mill Road corridor, which includes the existing station location, as a special focus area in the *Henrico County Vision 2026 Comprehensive Plan.* This designation will provide redevelopment guidance with the Amtrak station as the focal point. 1

- The County recommends pursing an incremental approach for programming, funding, and constructing the estimated $1.483 billion in improvements associated with this build alternative. Specifically, upgrades to the Staples Mill Station should be prioritized for implementation in the near term. To help achieve the stated goal of diverting passenger trips from automobile to rail, a new station building with more capacity and passenger amenities is needed prior to adding additional service. The recent $8.3 million investment by the Commonwealth to purchase property adjacent to the existing station and construct additional parking will greatly improve access, circulation, and vehicular capacity. Once completed in 2018, the site will include approximately 600 parking spaces, improved internal circulation and access for pedestrians, bicyclists, passenger vehicles, taxis, and buses, as well as improved drainage and stormwater management on the site. The existing station building, however, has only seen minor upgrades/expansions since it was originally constructed in 1976. It lacks the capacity to safely accommodate passengers during peak boarding times and lacks adequate space to provide passenger, staff, and crew amenities needed and expected at the busiest Amtrak station in the State of Virginia. The County recommends construction of a larger replacement station building designed to accommodate the proposed future parking structure, pedestrian bridge and new/reconfigured platforms. 2 3 4

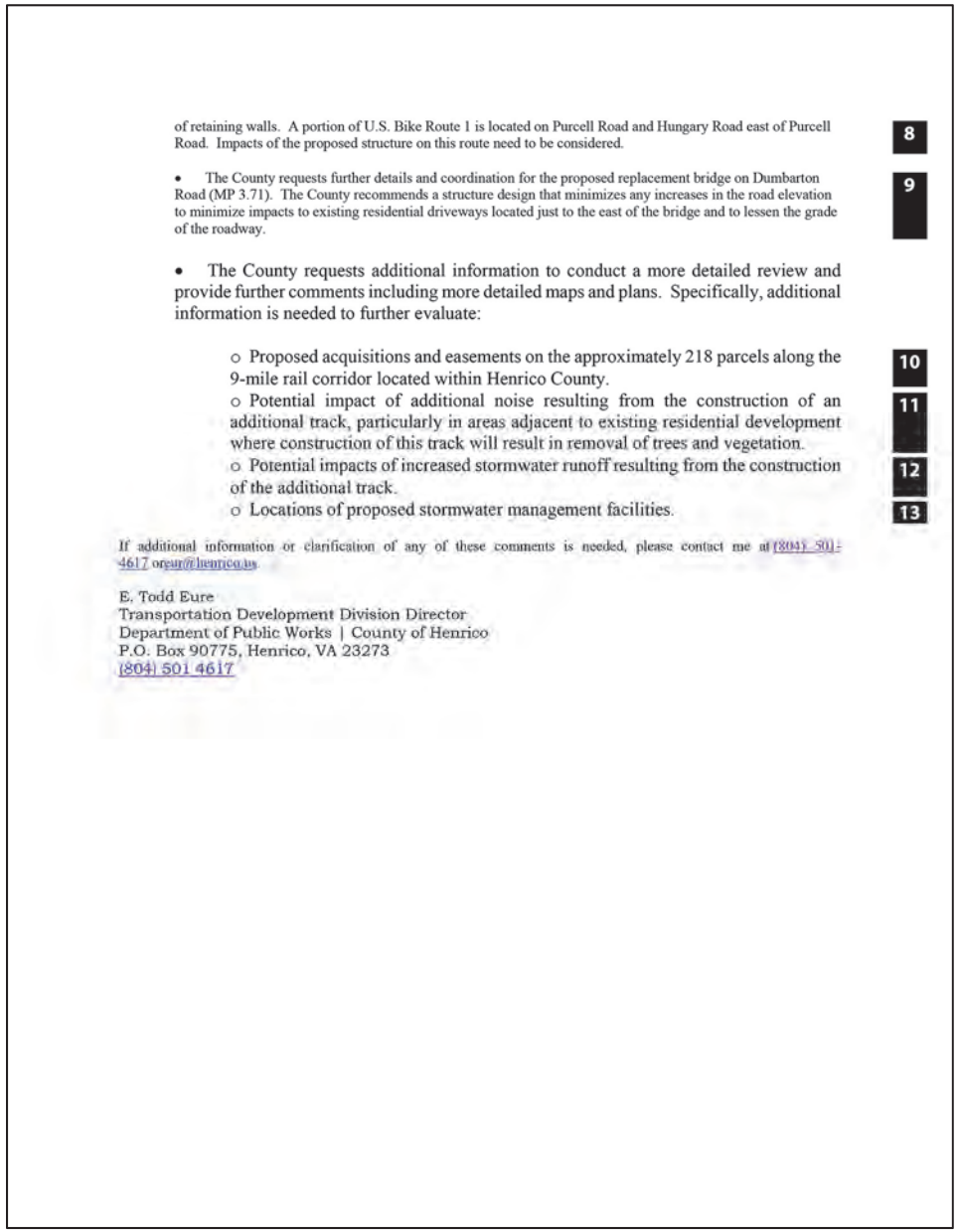
- The County requests further details and coordination for the proposed bridge on Hungary Road (MP 6.80). The proposed bridge will impact four existing intersections (Hungary Spring Road, Old Staples Mill Road, Oakview Avenue, and Purcell Road) located within 600 feet of the CSX tracks. Considerations include intersection realignment, stopping sight distance, horizontal sight distance, traffic control, turning movements (and possible future restrictions). The proposed structure will impact the existing Laurel Industrial School Historic District and at least one structure potentially eligible for listing in the NRHP. The County requests close coordination with the impacted property owners and surrounding community as a part of this project. The County recommends a structure design that minimizes the height of the finished grade of the roadway and height 5 6 7

HENRICO COUNTY

5. DRPT welcomes input regarding the design of the proposed Hungary Road overpass and will continue to coordinate with the County and other stakeholders during final design, which will occur after funding becomes available and incremental improvements are scheduled. The County's considerations for the proposed Hungary Road overpass are noted.

6. The Laurel Industrial School Historic District is eligible for the National Register of Historic Places (NRHP) as a district, and the Main Building (the Robert Stiles Building) on the Laurel Industrial School campus is also individually eligible for the NRHP. Both resources were discussed in the Project technical reports and both the Draft and Final EIS which describe their significance, state their eligibility, and present the potential for the Project to adversely impact these resources. This data can be found in and Chapters 3, 4, and 5 and Appendix R of the Draft EIS and in Chapters 5 and 6 and Appendix D of the Final EIS. Based on coordination with the Virginia Department of Historic Resources (DHR), it has been determined that the creation of the overpass will have an adverse effect on the historic district and the Main Building. Both resources are included in the Section 106 Draft Memorandum of Agreement (Appendix K of the Final EIS), which outlines steps being completed to mitigate the adverse effect on these two resources.

7. The County's recommendations to minimize the height of the finished grade of the roadway and retaining walls are noted. The height of the finished grade of the roadway will be determined during final design, and will be controlled by the existing elevation of the track, the FRA requirement for a vertical clearance of 24 feet 3 inches to the lowest member of the structure, the structure depth determined by the span width to meet CSXT horizontal clearance requirements, and the superstructure depth based on the projected traffic volumes and types of vehicles.



of retaining walls. A portion of U.S. Bike Route 1 is located on Purcell Road and Hungary Road east of Purcell Road. Impacts of the proposed structure on this route need to be considered. 8

- The County requests further details and coordination for the proposed replacement bridge on Dumbarton Road (MP 3.71). The County recommends a structure design that minimizes any increases in the road elevation to minimize impacts to existing residential driveways located just to the east of the bridge and to lessen the grade of the roadway. 9

- The County requests additional information to conduct a more detailed review and provide further comments including more detailed maps and plans. Specifically, additional information is needed to further evaluate:

  - Proposed acquisitions and easements on the approximately 218 parcels along the 9-mile rail corridor located within Henrico County. 10
  - Potential impact of additional noise resulting from the construction of an additional track, particularly in areas adjacent to existing residential development where construction of this track will result in removal of trees and vegetation. 11
  - Potential impacts of increased stormwater runoff resulting from the construction of the additional track. 12
  - Locations of proposed stormwater management facilities. 13

If additional information or clarification of any of these comments is needed, please contact me at (804) 501-4617 or eur@henrico.us.

E. Todd Eure
Transportation Development Division Director
Department of Public Works | County of Henrico
P.O. Box 90775, Henrico, VA 23273
(804) 501 4617

HENRICO COUNTY (continued)

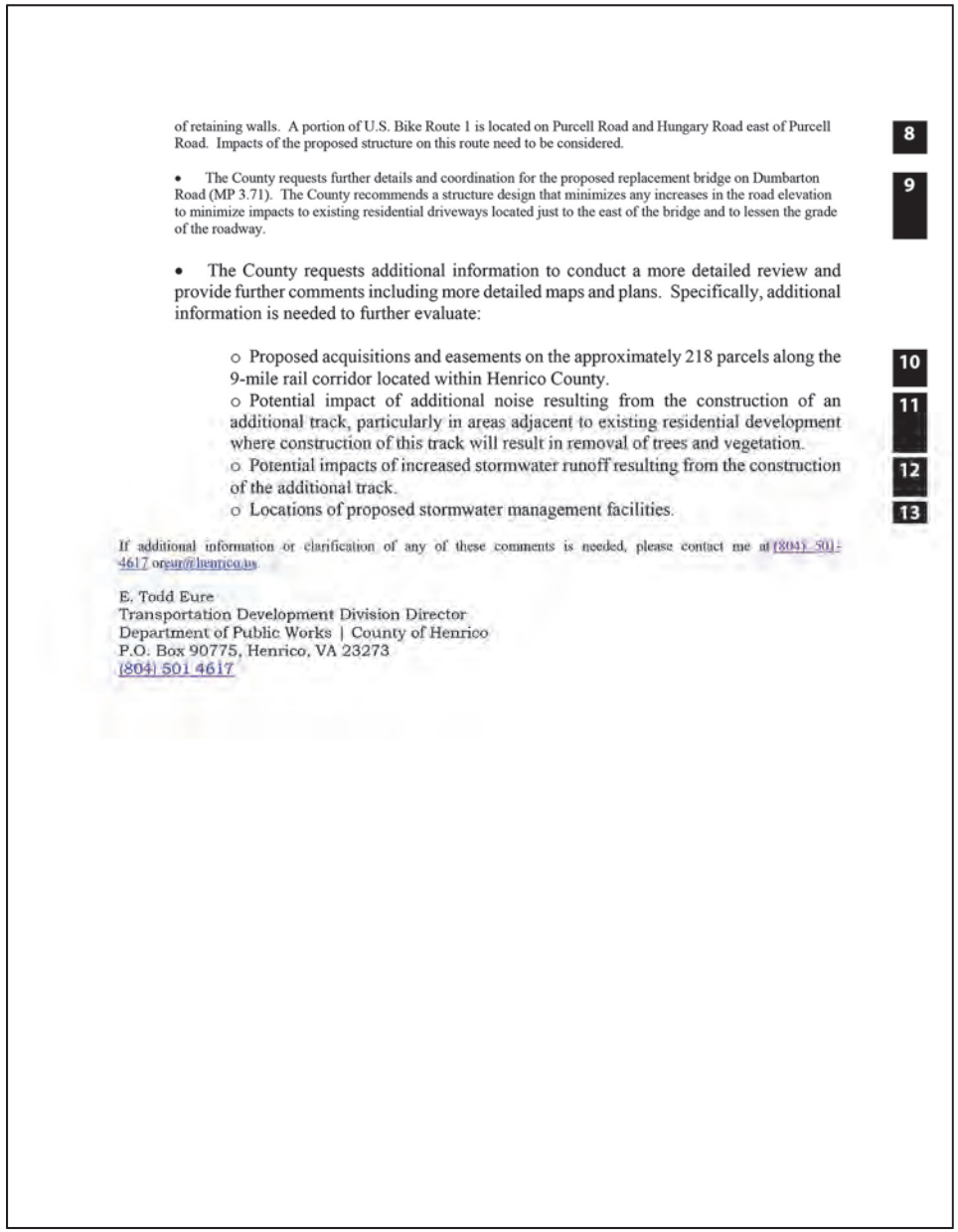
8. US Bike Route 1 is included in the proposed improvements approaching the proposed Hungary Road overpass. US Bike Route 1 connectivity will be maintained during the construction of Project improvements.

9. DRPT welcomes input regarding the design of the Dumbarton Road overpass and will continue to coordinate with the County and other stakeholders during final design, which will occur after funding becomes available and incremental improvements are scheduled. The County's recommendations for the proposed Dumbarton Road overpass are noted.

10. DRPT will continue to work to minimize property impacts during the final design process of the Project, which will take place once funding becomes available and incremental improvements are scheduled.

    Right of way and relocations are discussed in Section 5.11 of the Final EIS, which have been updated since the Draft EIS to reflect the conceptual design of the Preferred Alternative, as described in Chapter 4 of the Final EIS. Total and partial acquisition of parcels are expected throughout the corridor as part of the Project. The right-of-way acquisition process, including property owner notification, appraisal, acquisition, and relocation, will be conducted by VDOT, in coordination with DRPT and FRA, in accordance with Federal and state statutes and regulations. The CSXT crossing of Hungary Road, in Henrico County, is proposed to be modified to a grade-separated crossing under the Preferred Alternative. Due to the grade at this location, residential and business relocations may be unavoidable, primarily due to loss of access. Partial acquisitions of parcels will occur in other areas of Henrico County as well.

(Responses are continued on next page)



of retaining walls. A portion of U.S. Bike Route 1 is located on Purcell Road and Hungary Road east of Purcell Road. Impacts of the proposed structure on this route need to be considered. 8

- The County requests further details and coordination for the proposed replacement bridge on Dumbarton Road (MP 3.71). The County recommends a structure design that minimizes any increases in the road elevation to minimize impacts to existing residential driveways located just to the east of the bridge and to lessen the grade of the roadway. 9

- The County requests additional information to conduct a more detailed review and provide further comments including more detailed maps and plans. Specifically, additional information is needed to further evaluate:

  - Proposed acquisitions and easements on the approximately 218 parcels along the 9-mile rail corridor located within Henrico County. 10
  - Potential impact of additional noise resulting from the construction of an additional track, particularly in areas adjacent to existing residential development where construction of this track will result in removal of trees and vegetation. 11
  - Potential impacts of increased stormwater runoff resulting from the construction of the additional track. 12
  - Locations of proposed stormwater management facilities. 13

If additional information or clarification of any of these comments is needed, please contact me at (804) 501-4617 or eur@henrico.us.

E. Todd Eure
Transportation Development Division Director
Department of Public Works | County of Henrico
P.O. Box 90775, Henrico, VA 23273
(804) 501 4617

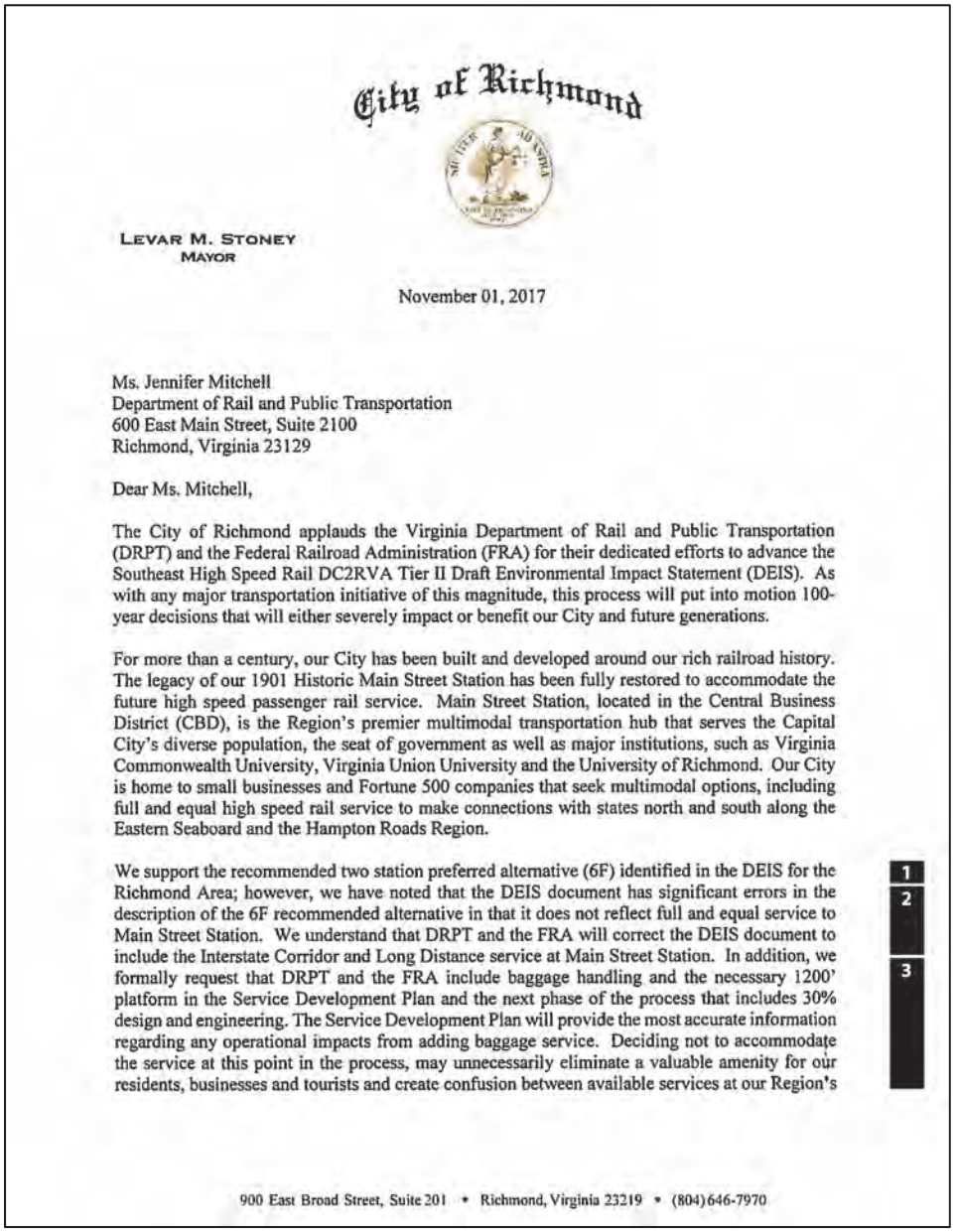
HENRICO COUNTY (continued)

11. DRPT evaluated noise effects of the proposed intercity passenger trains using FRA methods which qualify potential noise impacts as either moderate or severe. Locations where moderate and severe noise impacts are projected to occur are presented in the noise impact contour figures, in the noise and vibration technical report (Appendix P of the Draft EIS). There are no changes to the noise impact contours since the publication of the Draft EIS, with the exception of two areas for noise only; these two areas are detailed in Final EIS Section 5.7 and updated maps are provided in Appendix M of the Final EIS.

    DRPT also evaluated construction noise associated with the Project. After the final design is complete, potential noise impacts will be reevaluated, and mitigation measures will be finalized. Final design will occur after funding becomes available and incremental improvements are scheduled. DRPT also notes that FRA does not consider trees and vegetation to be effective at reducing train noise.

12. Section 5.1.1.3 of the Final EIS discusses the potential stormwater runoff impacts from the construction of additional rail bed and track for the Preferred Alternative. The Preferred Alternative will be designed and constructed in accordance with the Virginia Erosion and Sediment Control Law (§10.1-560 et seq. of the Code of Virginia), the Stormwater Management Act (§10.1-603. 1 et seq. of the Code of Virginia), and the terms and conditions of water quality permits required by USACE, Virginia DEQ, and VMRC.

13. Detailed drainage plans, including the locations of proposed stormwater management facilities, will be developed and shared with stakeholders during final design, which will take place once funding becomes available and incremental improvements are scheduled.



City of Richmond

LEVAR M. STONEY
MAYOR

November 01, 2017

Ms. Jennifer Mitchell
Department of Rail and Public Transportation
600 East Main Street, Suite 2100
Richmond, Virginia 23129

Dear Ms. Mitchell,

The City of Richmond applauds the Virginia Department of Rail and Public Transportation (DRPT) and the Federal Railroad Administration (FRA) for their dedicated efforts to advance the Southeast High Speed Rail DC2RVA Tier II Draft Environmental Impact Statement (DEIS). As with any major transportation initiative of this magnitude, this process will put into motion 100-year decisions that will either severely impact or benefit our City and future generations.

For more than a century, our City has been built and developed around our rich railroad history. The legacy of our 1901 Historic Main Street Station has been fully restored to accommodate the future high speed passenger rail service. Main Street Station, located in the Central Business District (CBD), is the Region's premier multimodal transportation hub that serves the Capital City's diverse population, the seat of government as well as major institutions, such as Virginia Commonwealth University, Virginia Union University and the University of Richmond. Our City is home to small businesses and Fortune 500 companies that seek multimodal options, including full and equal high speed rail service to make connections with states north and south along the Eastern Seaboard and the Hampton Roads Region.

We support the recommended two station preferred alternative (6F) identified in the DEIS for the Richmond Area; however, we have noted that the DEIS document has significant errors in the description of the 6F recommended alternative in that it does not reflect full and equal service to Main Street Station. We understand that DRPT and the FRA will correct the DEIS document to include the Interstate Corridor and Long Distance service at Main Street Station. In addition, we formally request that DRPT and the FRA include baggage handling and the necessary 1200' platform in the Service Development Plan and the next phase of the process that includes 30% design and engineering. The Service Development Plan will provide the most accurate information regarding any operational impacts from adding baggage service. Deciding not to accommodate the service at this point in the process, may unnecessarily eliminate a valuable amenity for our residents, businesses and tourists and create confusion between available services at our Region's

1
2
3

900 East Broad Street, Suite 201 • Richmond, Virginia 23219 • (804)646-7970

CITY OF RICHMOND

1. DRPT notes the City's recommendation of Build Alternative 6F: Full Service (Staples Mill Road Station and Main Street Station), which has been selected as the Preferred Alternative for inclusion in the Final EIS.
2. DRPT agrees that an incorrect summary of Build Alternative 6F with regard to service at Main Street Station was provided in the "Recommended Preferred Alternative" section of the Draft EIS Executive Summary (note that the full detailed descriptions provided in Chapters 2 and 7 of the Draft EIS were correct). The Draft Executive Summary text has been corrected; refer to the errata table for the Draft EIS, which is Appendix A of the Final EIS. Additionally, DRPT has ensure that all descriptions of Alternative 6F are correct throughout the Final EIS.
3. The City provided detailed comments regarding 1,200-foot platforms on the west side of Main Street Station in their attachment; refer to DRPT-numbered statements #10 through #15 for response.

stations. As such, we request that the 6F alternative in the DEIS be revised to reflect full service, baggage handling and a 1200' platform at Main Street Station. In addition to the corrections and baggage handling, we have prepared the attached comments related to the 6F alternative to be formally considered as part of the DEIS. 3 4

Again, we sincerely appreciate the ongoing collaboration and efforts by DRPT and FRA to advance this major initiative for the Commonwealth of Virginia. Please feel free to reach out to my staff if you have any questions.

Kind regards,

Levar Stoney

Cc: Honorable Terry McAuliffe, Governor
Honorable Tim Kaine, U.S. Senator
Honorable Mark Warner, U.S. Senator
Honorable Donald McEachin, U.S. Representative
Honorable Aubrey Lane, Secretary of Transportation
Mr. Carlos Brown, Commonwealth Transportation Board Member
Mr. Marty Williams, Commonwealth Transportation Board Member
Mr. Heath Hall, Acting Administrator, Federal Railroad Administration

CITY OF RICHMOND (continued)

(Response to comment 3 on previous page)

4. DRPT responded to the City's attached comments; refer to DRPT-numbered statements #5 through #36 below

City of Richmond, Virginia
Comments Regarding Southeast High Speed Rail DC2RVA
Draft Environmental Impact Statement (DEIS)
October 16, 2017

General Comments:

- The City of Richmond requests that a traffic impact analysis of the proposed elevated structure and crossings be conducted as part of the 30% design and engineering. All traffic impact analysis must be reviewed by the City Department of Public Works Traffic Engineering. 5
- Any expansion of tracks, grade separation and/or fencing of the proposed high speed rail alignment within the City of Richmond limits must consider the adjacent land use and provide safe crossings for pedestrians, bicyclists and full vehicles at locations agreed upon with the City of Richmond's Department of Planning, Department of Economic Development and Department of Public Works. 6
- The City of Richmond has recently launched Richmond 300 a multi-year initiative to update the City's Comprehensive Plan. As such, any rail project development, including the 30% design and engineering phase, must coordinate with this planning process. 7
- Additional maintenance funding will be required from the Commonwealth of Virginia if any structures constructed as part of the DC2RVA project are expected to be owned by the City of Richmond. 8

Corrections to the DC2RVA DEIS Document:

- The DC2RVA Draft Environmental Impact Statement (DEIS) document contained serious errors that must be corrected in the final published version: 9
  - Chapter 2 Page 121 Table 2.6-2: The 6F Alternative incorrectly states that Main Street Station will have "No Service" from the Interstate and Long Distance trains.

    City of Richmond Comment: Correct Table 2.6-2 to reflect full service and stops at Main Street Station by the Interstate and Long Distance trains.

  - Page 64 of the DC2RVA DEIS Executive Summary incorrectly states "Interstate Corridor (Carolinian) and Long Distance passenger trains would be routed through Staples Mill Road Station to Centralia using the A-Line bypassing Main Street Station."

    City of Richmond Comment: Correct this language to reflect all Interstate Corridor and Long Distance passenger trains routed through and stopping at Main Street Station using the S-Line to Centralia.

Recommended Preferred Alternative 6F Corrected:

- **Baggage Handling** – The Department of Rail and Public Transportation (DRPT) recommended alternative calls for Main Street Station to be served by all Long Distance, Interstate Corridor and Northeast Regional passenger trains moving north-south through Richmond (p. 7-13). Under the Technical Criteria section (2.3.2.1 – p.2-18), DRPT states that "Platform length should be 850 feet for platforms serving Northeast Regional and Interstate Corridor trains and VRE commuter trains, and 1,200 feet for platforms serving Long Distance Trains." However, DRPT's preferred alternative (6F)

1

CITY OF RICHMOND (continued)

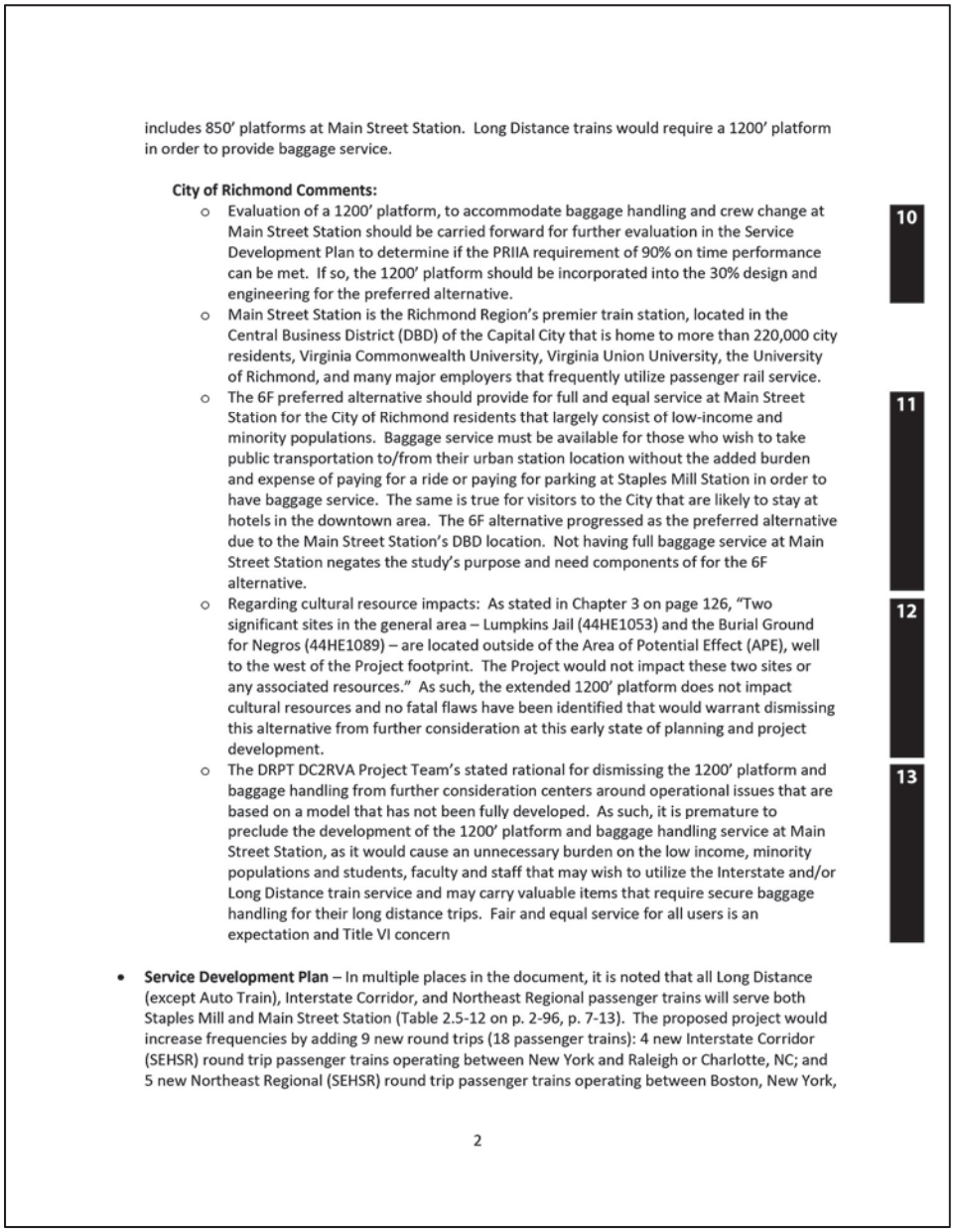
5. The Draft EIS includes a traffic queuing analysis at all at-grade crossings (see Section 4.15.2); the analyses provided are sufficient for the conceptual engineering upon which the Draft EIS analyses are based. Additional review of traffic data to update traffic conditions will be performed for all at-grade crossings, including those recommended for grade separation, as part of final design after funding becomes available and a construction schedule is established.

6. and 7. Comment noted. Land use, comprehensive planning, and land use compatibility of the Preferred Alternative is discussed in Section 5.11 of the Final EIS and bicycle and pedestrian safety is provided in Section 5.18 of the Final EIS, which has been expanded since the Draft EIS. DRPT will coordinate with the City during final design, after funding becomes available and a construction schedule is established, for all work within the City.

8. The DC2RVA Project includes improving track and other rail infrastructure on existing CSXT right-of-way, and while ownership and responsibility for maintenance of proposed Project improvements has not been determined, DRPT anticipates the track and rail infrastructure will be owned and maintained by CSXT. Station improvements, including platforms and parking facilities, would likely be owned and maintained by Amtrak and/or the locality, or other stakeholder.

9. The Build Alternative 6F and Build Alternative 6G rows in Draft EIS Table 2.6-2 were inadvertently switched; the data showing for Build Alternative 6F in the table is appropriate and accurate for Build Alternative 6G, and vice versa. This correction has been made in the Final EIS; refer to the errata table for the Draft EIS, which is Appendix A of the Final EIS.

   In regard to the City's comment on the summary of Alternative 6F within the Draft EIS, refer to DRPT-numbered statement #2.



includes 850' platforms at Main Street Station. Long Distance trains would require a 1200' platform in order to provide baggage service.

City of Richmond Comments:

- Evaluation of a 1200' platform, to accommodate baggage handling and crew change at Main Street Station should be carried forward for further evaluation in the Service Development Plan to determine if the PRIIA requirement of 90% on time performance can be met. If so, the 1200' platform should be incorporated into the 30% design and engineering for the preferred alternative. 10
- Main Street Station is the Richmond Region's premier train station, located in the Central Business District (DBD) of the Capital City that is home to more than 220,000 city residents, Virginia Commonwealth University, Virginia Union University, the University of Richmond, and many major employers that frequently utilize passenger rail service.
- The 6F preferred alternative should provide for full and equal service at Main Street Station for the City of Richmond residents that largely consist of low-income and minority populations. Baggage service must be available for those who wish to take public transportation to/from their urban station location without the added burden and expense of paying for a ride or paying for parking at Staples Mill Station in order to have baggage service. The same is true for visitors to the City that are likely to stay at hotels in the downtown area. The 6F alternative progressed as the preferred alternative due to the Main Street Station's DBD location. Not having full baggage service at Main Street Station negates the study's purpose and need components of for the 6F alternative. 11
- Regarding cultural resource impacts: As stated in Chapter 3 on page 126, "Two significant sites in the general area – Lumpkins Jail (44HE1053) and the Burial Ground for Negros (44HE1089) – are located outside of the Area of Potential Effect (APE), well to the west of the Project footprint. The Project would not impact these two sites or any associated resources." As such, the extended 1200' platform does not impact cultural resources and no fatal flaws have been identified that would warrant dismissing this alternative from further consideration at this early state of planning and project development. 12
- The DRPT DC2RVA Project Team's stated rational for dismissing the 1200' platform and baggage handling from further consideration centers around operational issues that are based on a model that has not been fully developed. As such, it is premature to preclude the development of the 1200' platform and baggage handling service at Main Street Station, as it would cause an unnecessary burden on the low income, minority populations and students, faculty and staff that may wish to utilize the Interstate and/or Long Distance train service and may carry valuable items that require secure baggage handling for their long distance trips. Fair and equal service for all users is an expectation and Title VI concern 13

- **Service Development Plan** – In multiple places in the document, it is noted that all Long Distance (except Auto Train), Interstate Corridor, and Northeast Regional passenger trains will serve both Staples Mill and Main Street Station (Table 2.5-12 on p. 2-96, p. 7-13). The proposed project would increase frequencies by adding 9 new round trips (18 passenger trains): 4 new Interstate Corridor (SEHSR) round trip passenger trains operating between New York and Raleigh or Charlotte, NC; and 5 new Northeast Regional (SEHSR) round trip passenger trains operating between Boston, New York,

2

CITY OF RICHMOND (continued)

10. through 15. To streamline answers to the City's many concerns at Main Street Station as part of the Preferred Alternative 6F, DRPT has provided a summary explanation for the selection of 6F as the Preferred alternative, followed by response to five topic areas, below:

    The DC2RVA Project will add a second track on each side of Main Street Station using the existing elevated rail trestles/viaducts, which currently have one operating track on each side where two tracks previously existed. The two tracks on both east and west sides of the station will be used by both freight and passenger services. The Project will also add two low-level platforms on each side of the station (a total of four platforms). Platforms on the east side of the station will extend 850 feet by 15 feet wide. Platforms on the west side of the station will extend 950 feet by 15 feet wide. The east and west-side platforms adjacent to the station (the "inside" platforms) will incorporate the platforms built into the renovated train shed and extend them north on new structures parallel to the existing track viaduct. These platforms will be accessible from the train shed. The "outside" east and west-side platforms will be built on new structures adjacent to the existing east and west viaducts. Elevators and staircases will provide access to the outside platforms from ground level. The Project will also add a walkway attached to both sides of the western viaduct, extending approximately 200 feet north and south from the new platform ends. The walkways will provide crew the ability to safely enter/exit rail cars that extend beyond the platforms when a passenger train longer than 850 feet is stopped at the station. DRPT will coordinate with the City of Richmond to develop a parking plan for Main Street Station's future intercity passenger needs in conjunction with the City's plans for its property around Main Street Station and other development within Shockoe Valley.

(Responses are continued on next page)

includes 850' platforms at Main Street Station. Long Distance trains would require a 1200' platform in order to provide baggage service.

City of Richmond Comments:

- Evaluation of a 1200' platform, to accommodate baggage handling and crew change at Main Street Station should be carried forward for further evaluation in the Service Development Plan to determine if the PRIIA requirement of 90% on time performance can be met. If so, the 1200' platform should be incorporated into the 30% design and engineering for the preferred alternative. 10
- Main Street Station is the Richmond Region's premier train station, located in the Central Business District (DBD) of the Capital City that is home to more than 220,000 city residents, Virginia Commonwealth University, Virginia Union University, the University of Richmond, and many major employers that frequently utilize passenger rail service.
- The 6F preferred alternative should provide for full and equal service at Main Street Station for the City of Richmond residents that largely consist of low-income and minority populations. Baggage service must be available for those who wish to take public transportation to/from their urban station location without the added burden and expense of paying for a ride or paying for parking at Staples Mill Station in order to have baggage service. The same is true for visitors to the City that are likely to stay at hotels in the downtown area. The 6F alternative progressed as the preferred alternative due to the Main Street Station's DBD location. Not having full baggage service at Main Street Station negates the study's purpose and need components of for the 6F alternative. 11
- Regarding cultural resource impacts: As stated in Chapter 3 on page 126, "Two significant sites in the general area – Lumpkins Jail (44HE1053) and the Burial Ground for Negros (44HE1089) – are located outside of the Area of Potential Effect (APE), well to the west of the Project footprint. The Project would not impact these two sites or any associated resources." As such, the extended 1200' platform does not impact cultural resources and no fatal flaws have been identified that would warrant dismissing this alternative from further consideration at this early state of planning and project development. 12
- The DRPT DC2RVA Project Team's stated rational for dismissing the 1200' platform and baggage handling from further consideration centers around operational issues that are based on a model that has not been fully developed. As such, it is premature to preclude the development of the 1200' platform and baggage handling service at Main Street Station, as it would cause an unnecessary burden on the low income, minority populations and students, faculty and staff that may wish to utilize the Interstate and/or Long Distance train service and may carry valuable items that require secure baggage handling for their long distance trips. Fair and equal service for all users is an expectation and Title VI concern 13

- **Service Development Plan** – In multiple places in the document, it is noted that all Long Distance (except Auto Train), Interstate Corridor, and Northeast Regional passenger trains will serve both Staples Mill and Main Street Station (Table 2.5-12 on p. 2-96, p. 7-13). The proposed project would increase frequencies by adding 9 new round trips (18 passenger trains): 4 new Interstate Corridor (SEHSR) round trip passenger trains operating between New York and Raleigh or Charlotte, NC; and 5 new Northeast Regional (SEHSR) round trip passenger trains operating between Boston, New York,

2

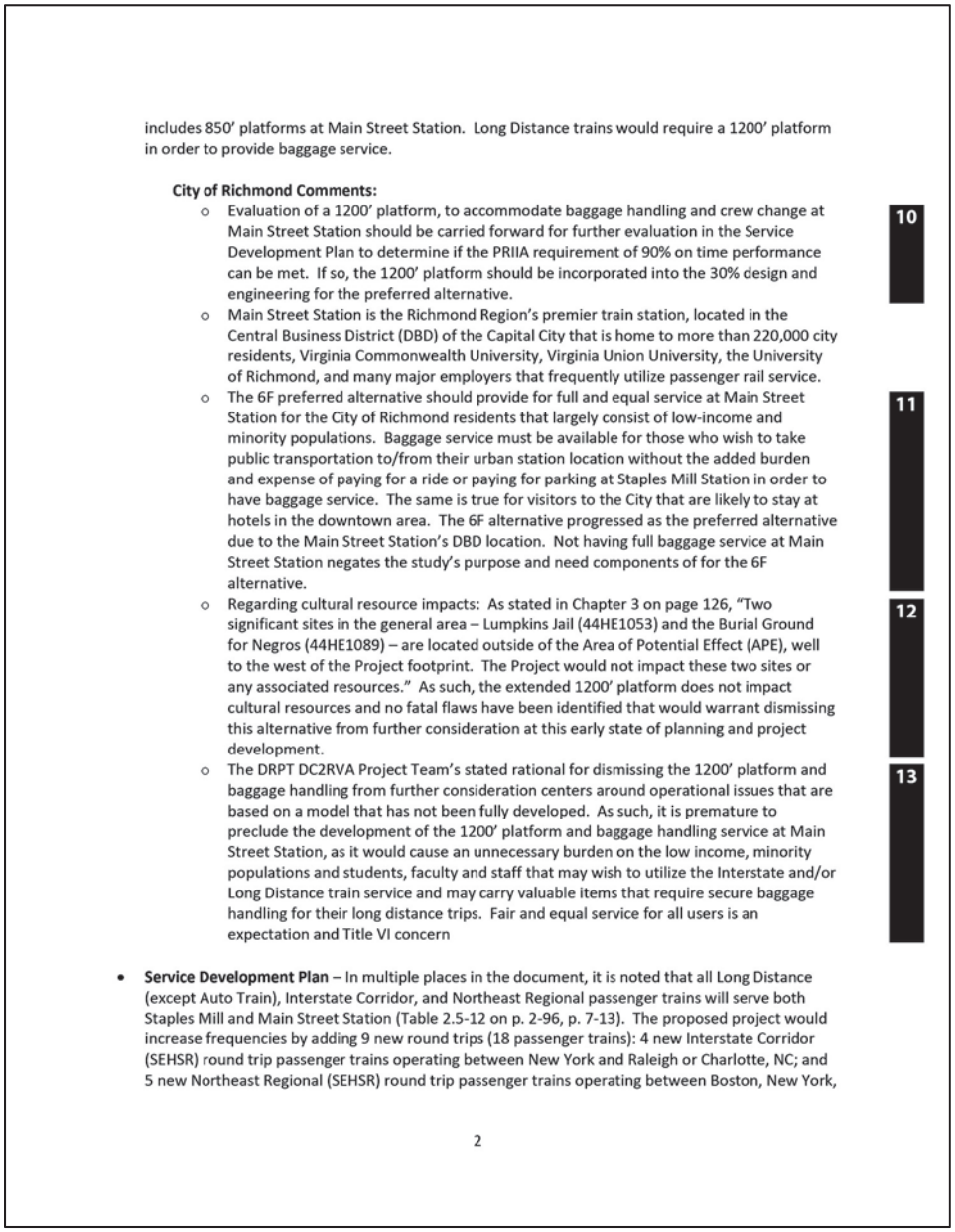
CITY OF RICHMOND (continued)

DRPT considered and dismissed adding a third track on the west side of the station due to site constraints and potential impacts to cultural resources in the area. DRPT also considered and dismissed making the west side platforms 1,200 feet long in keeping with the Project's Basis of Design to fully accommodate long-distance trains, opting instead for a reduced platform length of 950 feet plus an extended walkway, owing to site constraints and to minimize potential impacts to cultural resources. Chapter 4 of the Final EIS clarifies that while Main Street Station site constraints and concerns over potential impacts to cultural resources limit the number of tracks and length of platforms proposed for the station, future passenger service amenities to be provided at the station, such as checked baggage service, are not precluded. Amenities to be provided at each station for a particular passenger service will be determined through coordination between Amtrak, the City of Richmond, and other station stakeholders, and are not included as part of the DC2RVA Project. DRPT has assumed that Amtrak's scheduled crew changes in the Richmond area, which currently occur at Staples Mill Road Station, would continue to occur at Staples Mill Road Station under this alternative. DRPT also included a parking deck on the east side of Main Street Station in the Draft EIS; this parking deck has been dismissed from consideration in lieu of coordinating with the City to develop a Main Street Station parking plan when future service is implemented.

Site Constraints at Main Street Station

Historically, Main Street Station was served by two tracks on the west and two tracks on the east, all on elevated railroad trestle/viaduct. Currently, there is only one track operating on each side of the station on the existing viaducts. DRPT considered adding one or more main tracks on the west side of the station, and determined that one additional track could be added to the viaduct which was constructed for and previously supported two tracks. Any additional track would need to be on new structure and located approximately 35 feet west of the existing rail viaduct to accommodate an island platform of 24 feet width at the station. Site constraints that preclude adding a third track on the west side include:

(Responses are continued on next page)



includes 850' platforms at Main Street Station. Long Distance trains would require a 1200' platform in order to provide baggage service.

City of Richmond Comments:

- Evaluation of a 1200' platform, to accommodate baggage handling and crew change at Main Street Station should be carried forward for further evaluation in the Service Development Plan to determine if the PRIIA requirement of 90% on time performance can be met. If so, the 1200' platform should be incorporated into the 30% design and engineering for the preferred alternative. 10
- Main Street Station is the Richmond Region's premier train station, located in the Central Business District (DBD) of the Capital City that is home to more than 220,000 city residents, Virginia Commonwealth University, Virginia Union University, the University of Richmond, and many major employers that frequently utilize passenger rail service.
- The 6F preferred alternative should provide for full and equal service at Main Street Station for the City of Richmond residents that largely consist of low-income and minority populations. Baggage service must be available for those who wish to take public transportation to/from their urban station location without the added burden and expense of paying for a ride or paying for parking at Staples Mill Station in order to have baggage service. The same is true for visitors to the City that are likely to stay at hotels in the downtown area. The 6F alternative progressed as the preferred alternative due to the Main Street Station's DBD location. Not having full baggage service at Main Street Station negates the study's purpose and need components of for the 6F alternative. 11
- Regarding cultural resource impacts: As stated in Chapter 3 on page 126, "Two significant sites in the general area – Lumpkins Jail (44HE1053) and the Burial Ground for Negros (44HE1089) – are located outside of the Area of Potential Effect (APE), well to the west of the Project footprint. The Project would not impact these two sites or any associated resources." As such, the extended 1200' platform does not impact cultural resources and no fatal flaws have been identified that would warrant dismissing this alternative from further consideration at this early state of planning and project development. 12
- The DRPT DC2RVA Project Team's stated rational for dismissing the 1200' platform and baggage handling from further consideration centers around operational issues that are based on a model that has not been fully developed. As such, it is premature to preclude the development of the 1200' platform and baggage handling service at Main Street Station, as it would cause an unnecessary burden on the low income, minority populations and students, faculty and staff that may wish to utilize the Interstate and/or Long Distance train service and may carry valuable items that require secure baggage handling for their long distance trips. Fair and equal service for all users is an expectation and Title VI concern 13

- **Service Development Plan** – In multiple places in the document, it is noted that all Long Distance (except Auto Train), Interstate Corridor, and Northeast Regional passenger trains will serve both Staples Mill and Main Street Station (Table 2.5-12 on p. 2-96, p. 7-13). The proposed project would increase frequencies by adding 9 new round trips (18 passenger trains): 4 new Interstate Corridor (SEHSR) round trip passenger trains operating between New York and Raleigh or Charlotte, NC; and 5 new Northeast Regional (SEHSR) round trip passenger trains operating between Boston, New York,

2

CITY OF RICHMOND (continued)

- The viaduct on the west side of the station threads between two piers (located at the southwest corner of the station building adjacent to East Main Street) supporting I-95 elevated above the viaduct. These and multiple other piers adjacent to the viaduct just south of the station preclude adding an additional track.
- Approximately 1,100 feet south of the station, the viaduct passes through the middle tier of the "triple crossing", an iconic grade-separated rail crossing of three rail lines. The existing viaduct opening is sized for only two tracks, and would not allow a third track without replacing the triple crossing structure.
- Approximately 500 feet north of the renovated train shed, the rail viaducts pass over E. Broad Street. The vertical clearance for Broad Street beneath the rail viaducts is 13 feet-8 inches, which is less than the VDOT standard of 16 feet-6 inches. Broad Street also slopes upward west of the rail viaduct to climb over I-95. Adding a third track across Broad Street 35 feet west of the existing west viaduct would compound the roadway vertical clearance limitations.

DC2RVA's Basis of Design, following Amtrak's Station Program and Planning Guidelines (2013), calls for 1,200 feet long platforms for stations servicing Amtrak's Long Distance passenger trains and 850 feet long platforms for stations serving only Regional passenger trains. The Basis of Design matches the length of the platforms to the length of the train consists, with the goal of allowing direct access from the entire train – locomotive, passenger cars, etc. – to the platform with a single stop. Matching the platform length to the train consist optimizes passenger access, and allows crew members to exit the train safely at the station if needed. DRPT considered adding two 1,200 feet long platforms on the west side of the station that would accommodate the full length of Long Distance trains. However, DRPT determined that two 1,200 feet platforms were not practical on the west side due to physical site constraints and potential impacts to cultural resources. Site constraints that precluded extending the platforms to 1,200 feet are similar to those affecting adding a third track, and include:

(Responses are continued on next page)

includes 850' platforms at Main Street Station. Long Distance trains would require a 1200' platform in order to provide baggage service.

City of Richmond Comments:

- Evaluation of a 1200' platform, to accommodate baggage handling and crew change at Main Street Station should be carried forward for further evaluation in the Service Development Plan to determine if the PRIIA requirement of 90% on time performance can be met. If so, the 1200' platform should be incorporated into the 30% design and engineering for the preferred alternative. 10
- Main Street Station is the Richmond Region's premier train station, located in the Central Business District (DBD) of the Capital City that is home to more than 220,000 city residents, Virginia Commonwealth University, Virginia Union University, the University of Richmond, and many major employers that frequently utilize passenger rail service.
- The 6F preferred alternative should provide for full and equal service at Main Street Station for the City of Richmond residents that largely consist of low-income and minority populations. Baggage service must be available for those who wish to take public transportation to/from their urban station location without the added burden and expense of paying for a ride or paying for parking at Staples Mill Station in order to have baggage service. The same is true for visitors to the City that are likely to stay at hotels in the downtown area. The 6F alternative progressed as the preferred alternative due to the Main Street Station's DBD location. Not having full baggage service at Main Street Station negates the study's purpose and need components of for the 6F alternative. 11
- Regarding cultural resource impacts: As stated in Chapter 3 on page 126, "Two significant sites in the general area – Lumpkins Jail (44HE1053) and the Burial Ground for Negros (44HE1089) – are located outside of the Area of Potential Effect (APE), well to the west of the Project footprint. The Project would not impact these two sites or any associated resources." As such, the extended 1200' platform does not impact cultural resources and no fatal flaws have been identified that would warrant dismissing this alternative from further consideration at this early state of planning and project development. 12
- The DRPT DC2RVA Project Team's stated rational for dismissing the 1200' platform and baggage handling from further consideration centers around operational issues that are based on a model that has not been fully developed. As such, it is premature to preclude the development of the 1200' platform and baggage handling service at Main Street Station, as it would cause an unnecessary burden on the low income, minority populations and students, faculty and staff that may wish to utilize the Interstate and/or Long Distance train service and may carry valuable items that require secure baggage handling for their long distance trips. Fair and equal service for all users is an expectation and Title VI concern 13

- **Service Development Plan** – In multiple places in the document, it is noted that all Long Distance (except Auto Train), Interstate Corridor, and Northeast Regional passenger trains will serve both Staples Mill and Main Street Station (Table 2.5-12 on p. 2-96, p. 7-13). The proposed project would increase frequencies by adding 9 new round trips (18 passenger trains): 4 new Interstate Corridor (SEHSR) round trip passenger trains operating between New York and Raleigh or Charlotte, NC; and 5 new Northeast Regional (SEHSR) round trip passenger trains operating between Boston, New York,

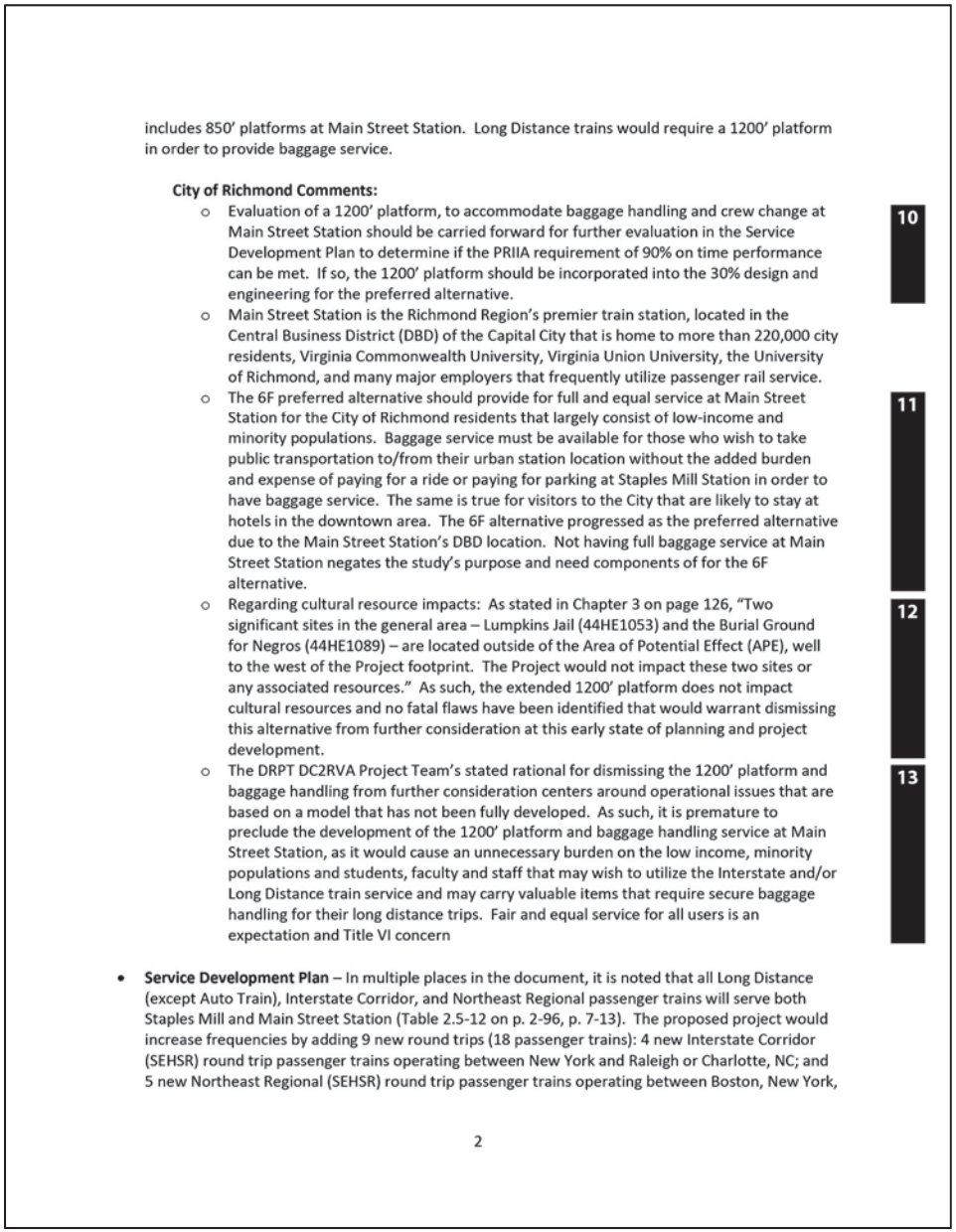
2

CITY OF RICHMOND (continued)

- The viaduct on the west side of the station threads between two piers (located at the southwest corner of the station building adjacent to East Main Street) supporting I-95 elevated above the viaduct. These piers physically prevent the west side platforms from extending south.
- Approximately 500 feet north of the renovated train shed, the viaducts pass over E. Broad Street. The vertical clearance for Broad Street beneath the rail viaducts is 13 feet-8 inches, which is less than the VDOT standard of 16 feet-6 inches. Broad Street also slopes upward west of the rail viaducts to climb over I-95. Adding a platform across Broad Street on the west would compound the roadway clearance limitations in order to maintain access to an extended platform.
- The existing rail trestle bridge over Broad Street is an approximately 75 feet thru-truss girder span that prevents access to the tracks from a platform over Broad Street – thus any platform extending north from the station across Broad Street would have an approximately 75 feet gap with no access to the train.

A platform length of 950 feet is the maximum that can be added on the west side without conflict with either the I-95 piers at the southern end, or vertical clearance and track access over Broad Street at the northern end. The use of walkways along the track viaducts extending 200 feet in each direction from the ends of the platform allows crew members to safely exit the train at the station if necessary.

(Responses are continued on next page)



includes 850' platforms at Main Street Station. Long Distance trains would require a 1200' platform in order to provide baggage service.

City of Richmond Comments:

- Evaluation of a 1200' platform, to accommodate baggage handling and crew change at Main Street Station should be carried forward for further evaluation in the Service Development Plan to determine if the PRIIA requirement of 90% on time performance can be met. If so, the 1200' platform should be incorporated into the 30% design and engineering for the preferred alternative. 10
- Main Street Station is the Richmond Region's premier train station, located in the Central Business District (DBD) of the Capital City that is home to more than 220,000 city residents, Virginia Commonwealth University, Virginia Union University, the University of Richmond, and many major employers that frequently utilize passenger rail service.
- The 6F preferred alternative should provide for full and equal service at Main Street Station for the City of Richmond residents that largely consist of low-income and minority populations. Baggage service must be available for those who wish to take public transportation to/from their urban station location without the added burden and expense of paying for a ride or paying for parking at Staples Mill Station in order to have baggage service. The same is true for visitors to the City that are likely to stay at hotels in the downtown area. The 6F alternative progressed as the preferred alternative due to the Main Street Station's DBD location. Not having full baggage service at Main Street Station negates the study's purpose and need components of for the 6F alternative. 11
- Regarding cultural resource impacts: As stated in Chapter 3 on page 126, "Two significant sites in the general area – Lumpkins Jail (44HE1053) and the Burial Ground for Negros (44HE1089) – are located outside of the Area of Potential Effect (APE), well to the west of the Project footprint. The Project would not impact these two sites or any associated resources." As such, the extended 1200' platform does not impact cultural resources and no fatal flaws have been identified that would warrant dismissing this alternative from further consideration at this early state of planning and project development. 12
- The DRPT DC2RVA Project Team's stated rational for dismissing the 1200' platform and baggage handling from further consideration centers around operational issues that are based on a model that has not been fully developed. As such, it is premature to preclude the development of the 1200' platform and baggage handling service at Main Street Station, as it would cause an unnecessary burden on the low income, minority populations and students, faculty and staff that may wish to utilize the Interstate and/or Long Distance train service and may carry valuable items that require secure baggage handling for their long distance trips. Fair and equal service for all users is an expectation and Title VI concern 13

- **Service Development Plan** – In multiple places in the document, it is noted that all Long Distance (except Auto Train), Interstate Corridor, and Northeast Regional passenger trains will serve both Staples Mill and Main Street Station (Table 2.5-12 on p. 2-96, p. 7-13). The proposed project would increase frequencies by adding 9 new round trips (18 passenger trains): 4 new Interstate Corridor (SEHSR) round trip passenger trains operating between New York and Raleigh or Charlotte, NC; and 5 new Northeast Regional (SEHSR) round trip passenger trains operating between Boston, New York,

2

CITY OF RICHMOND (continued)

Concerns for Potential Impacts to Cultural Resources at Main Street Station

Multiple comments received by DRPT and FRA on the Draft EIS cited concerns over potential impacts from the Project to cultural resources in the Shockoe Bottom and Shockoe Valley area around Main Street Station. This includes comments from consulting parties (including the City of Richmond) and other groups and individuals with a vested interest in this area. The City of Richmond as a consulting party has received copies of all 22 technical reports produced on the corridor, associated correspondence, and coordination, and have attended meetings and telephone calls regarding cultural resource issues. The City will continue to be informed of all cultural resource tasks throughout the duration of the Project.

Comments received from all parties regarding this area cite both known architectural and archaeological resources in the area, as well as resources that may be in the area but are not yet identified or clearly defined. Of particular concern to many is the past history of Shockoe Bottom as a slave trading center, the proximity to Lumpkins Jail (Devil's Half-Acre) and the Burial Ground, and the Project's potential effects on "sacred ground". There is also concern that the Project could interfere with development of a memorial to the slave trading history of this area. While the Project footprint does not impact any known archaeological or historic site adjacent to Main Street Station associated with the slave trade, DRPT and FRA determined that minimizing the footprint in this area would reduce any potential impacts to the cultural resources concerns noted above, such as minimizing the platform length to reduce subsurface impacts in this area and eliminating the proposed parking deck. Additionally, at the request of several consulting parties, Lumpkins Jail site was added to the list of historic properties. The DHR determined that the Project will have no adverse effect on the site as no impacts will occur as part of the Project. However, a commitment to create a historic context on the Shockoe Bottom area and the slave trade is included in the Section 106 Draft Memorandum of Agreement (Appendix K of the Final EIS).

(Responses are continued on next page)

includes 850' platforms at Main Street Station. Long Distance trains would require a 1200' platform in order to provide baggage service.

City of Richmond Comments:

- Evaluation of a 1200' platform, to accommodate baggage handling and crew change at Main Street Station should be carried forward for further evaluation in the Service Development Plan to determine if the PRIIA requirement of 90% on time performance can be met. If so, the 1200' platform should be incorporated into the 30% design and engineering for the preferred alternative. 10
- Main Street Station is the Richmond Region's premier train station, located in the Central Business District (DBD) of the Capital City that is home to more than 220,000 city residents, Virginia Commonwealth University, Virginia Union University, the University of Richmond, and many major employers that frequently utilize passenger rail service.
- The 6F preferred alternative should provide for full and equal service at Main Street Station for the City of Richmond residents that largely consist of low-income and minority populations. Baggage service must be available for those who wish to take public transportation to/from their urban station location without the added burden and expense of paying for a ride or paying for parking at Staples Mill Station in order to have baggage service. The same is true for visitors to the City that are likely to stay at hotels in the downtown area. The 6F alternative progressed as the preferred alternative due to the Main Street Station's DBD location. Not having full baggage service at Main Street Station negates the study's purpose and need components of for the 6F alternative. 11
- Regarding cultural resource impacts: As stated in Chapter 3 on page 126, "Two significant sites in the general area – Lumpkins Jail (44HE1053) and the Burial Ground for Negros (44HE1089) – are located outside of the Area of Potential Effect (APE), well to the west of the Project footprint. The Project would not impact these two sites or any associated resources." As such, the extended 1200' platform does not impact cultural resources and no fatal flaws have been identified that would warrant dismissing this alternative from further consideration at this early state of planning and project development. 12
- The DRPT DC2RVA Project Team's stated rational for dismissing the 1200' platform and baggage handling from further consideration centers around operational issues that are based on a model that has not been fully developed. As such, it is premature to preclude the development of the 1200' platform and baggage handling service at Main Street Station, as it would cause an unnecessary burden on the low income, minority populations and students, faculty and staff that may wish to utilize the Interstate and/or Long Distance train service and may carry valuable items that require secure baggage handling for their long distance trips. Fair and equal service for all users is an expectation and Title VI concern 13

- **Service Development Plan** – In multiple places in the document, it is noted that all Long Distance (except Auto Train), Interstate Corridor, and Northeast Regional passenger trains will serve both Staples Mill and Main Street Station (Table 2.5-12 on p. 2-96, p. 7-13). The proposed project would increase frequencies by adding 9 new round trips (18 passenger trains): 4 new Interstate Corridor (SEHSR) round trip passenger trains operating between New York and Raleigh or Charlotte, NC; and 5 new Northeast Regional (SEHSR) round trip passenger trains operating between Boston, New York,

2

CITY OF RICHMOND (continued)

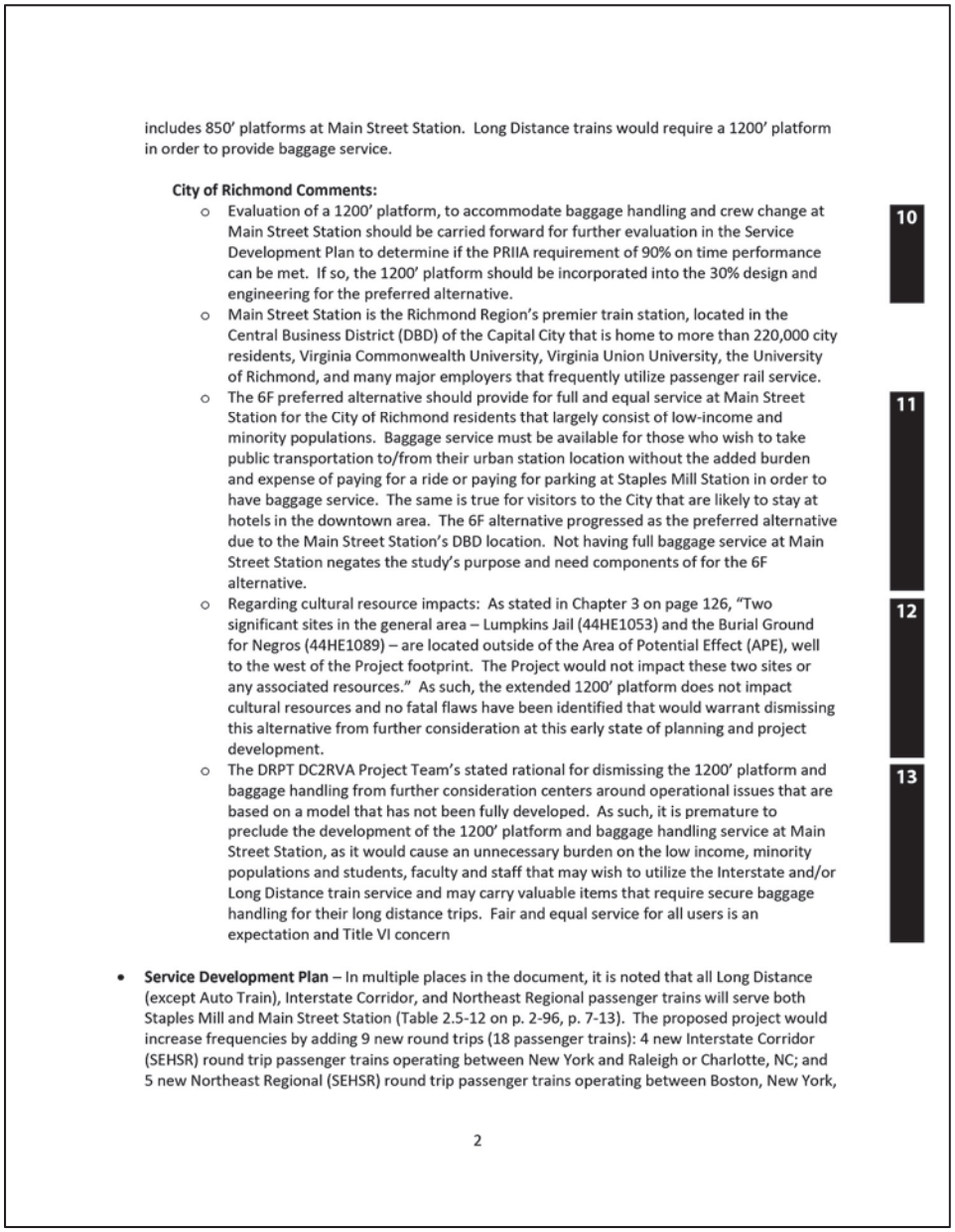
Sections 3.1, 5.13.1, 5.13.2, 5.13.3, 5.20.1.3, 6.5.3, 6.6.1, and 6.7 of the Final EIS provides further discussion of the Project's effects to cultural resources in the Shockoe Bottom.

Station Amenities

Amenities to be provided at each station for a particular passenger service will be determined prior to the inception of service through coordination between Amtrak, the station owner/operator, and other stakeholders, and are not included as part of the DC2RVA Project. DRPT has applied Amtrak's Station Program and Planning Guidelines (2013) to determine the general size or footprint of each station building based on 2045 ridership projections for the recommended preferred alternative. Each station is sized to accommodate various crew, passenger and service amenities based on the projected train service and ridership. While the potential cost of the station is included within the DC2RVA Project, the determination of the actual size, design and layout of each station, and the staffing and configuration of station and service amenities, including parking, is not part of the DC2RVA Project.

All of Amtrak's passenger cars have room for passengers to carry on and stow a limited number of bags. In addition, Amtrak typically provides checked baggage service with its Long Distance service, and may also provide checked baggage service with Interstate Corridor and some Regional trains as determined by Amtrak, its state funding partners, and other stakeholders. The provision of checked baggage service at Main Street Station is not precluded by the proposed platform sizes. In the current Amtrak timetable, ten (five round-trip) of the 18 (nine round-trip) trains that serve Richmond (Staples Mill Road Station) have checked baggage service, including: the two Northeast Regional (Virginia-supported) trains (one round-trip) that operate overnight on the Northeast Corridor and extend to Newport News (#66/67) and eight (four round-trip) trains that extend south of Virginia (Silver Star, Silver Meteor, Palmetto and Carolinian). The other four Northeast Regional (Virginia-supported) trains that serve Richmond, Newport News and Norfolk do not have baggage service.

(Responses are continued on next page)



includes 850' platforms at Main Street Station. Long Distance trains would require a 1200' platform in order to provide baggage service.

City of Richmond Comments:

- Evaluation of a 1200' platform, to accommodate baggage handling and crew change at Main Street Station should be carried forward for further evaluation in the Service Development Plan to determine if the PRIIA requirement of 90% on time performance can be met. If so, the 1200' platform should be incorporated into the 30% design and engineering for the preferred alternative. 10
- Main Street Station is the Richmond Region's premier train station, located in the Central Business District (DBD) of the Capital City that is home to more than 220,000 city residents, Virginia Commonwealth University, Virginia Union University, the University of Richmond, and many major employers that frequently utilize passenger rail service.
- The 6F preferred alternative should provide for full and equal service at Main Street Station for the City of Richmond residents that largely consist of low-income and minority populations. Baggage service must be available for those who wish to take public transportation to/from their urban station location without the added burden and expense of paying for a ride or paying for parking at Staples Mill Station in order to have baggage service. The same is true for visitors to the City that are likely to stay at hotels in the downtown area. The 6F alternative progressed as the preferred alternative due to the Main Street Station's DBD location. Not having full baggage service at Main Street Station negates the study's purpose and need components of for the 6F alternative. 11
- Regarding cultural resource impacts: As stated in Chapter 3 on page 126, "Two significant sites in the general area – Lumpkins Jail (44HE1053) and the Burial Ground for Negros (44HE1089) – are located outside of the Area of Potential Effect (APE), well to the west of the Project footprint. The Project would not impact these two sites or any associated resources." As such, the extended 1200' platform does not impact cultural resources and no fatal flaws have been identified that would warrant dismissing this alternative from further consideration at this early state of planning and project development. 12
- The DRPT DC2RVA Project Team's stated rational for dismissing the 1200' platform and baggage handling from further consideration centers around operational issues that are based on a model that has not been fully developed. As such, it is premature to preclude the development of the 1200' platform and baggage handling service at Main Street Station, as it would cause an unnecessary burden on the low income, minority populations and students, faculty and staff that may wish to utilize the Interstate and/or Long Distance train service and may carry valuable items that require secure baggage handling for their long distance trips. Fair and equal service for all users is an expectation and Title VI concern 13

- **Service Development Plan** – In multiple places in the document, it is noted that all Long Distance (except Auto Train), Interstate Corridor, and Northeast Regional passenger trains will serve both Staples Mill and Main Street Station (Table 2.5-12 on p. 2-96, p. 7-13). The proposed project would increase frequencies by adding 9 new round trips (18 passenger trains): 4 new Interstate Corridor (SEHSR) round trip passenger trains operating between New York and Raleigh or Charlotte, NC; and 5 new Northeast Regional (SEHSR) round trip passenger trains operating between Boston, New York,

2

CITY OF RICHMOND (continued)

In the future, when the additional passenger service frequencies proposed by the DC2RVA Project are added to Main Street Station, the provision of checked baggage service will be determined in coordination between Amtrak, its state funding partners, the City of Richmond, and other station stakeholders.

Simulation Model / Service Development Plan

The City stated that it was premature to preclude development of 1,200-foot platforms and checked baggage handling based on the simulations modeling, and requested that these options be carried forward in the Service Development Plan. Although DRPT recognizes that a 1,200-foot platform length is preferred for stations served by Long Distance trains due to their greater length, DRPT has chosen a 950 feet platform length for the west side of Main Street Station due to site constraints which restrict longer platforms and to avoid/reduce potential impacts to cultural resources from longer platforms. DRPT has proposed to extend walkways along the existing track viaduct to accommodate safe crew movements between train and station in lieu of longer platforms. DRPT has also chosen an 850 feet platform length for the east side in keeping with the Project's Basis of Design for the level of service. The proposed 950 feet and 850 feet platforms serve the Project's Purpose and Need with less impacts and less cost than the longer 1,200-foot platforms, and do not preclude checked baggage service at the station. DRPT's computerized operations simulation modeling described above and in the Draft EIS was conducted to inform the comparison of Project alternatives. Subsequent operations simulation modeling reported in the Final EIS validates that the infrastructure proposed in the preferred alternative meets service performance goals defined in the Purpose and Need; refer to Section 3.2 of the Final EIS for details.

(Responses are continued on next page)

or Washington, DC and destinations in Virginia. This would bring the number of passenger train frequencies in the corridor to 23 (Figure 2.3-3, p. 2-9).

Under the FRA grant, DRPT will prepare a Service Development Plan (SDP). With the completion of the DEIS, DRPT is now able to pursue this work. Section 2.2 of the DEIS describes the service plan inputs that DRPT will use in the SDP. The proposed new frequencies are largely based on previous Records of Decision (Raleigh-Richmond and Hampton Roads-Richmond), both of which included service to Main Street Station. The document notes that specific station stop patterns within the DC2RVA corridor, as well as north and south of the corridor are subject to future refinement based on ridership analyses, future operating conditions, and stakeholder and public input.

City of Richmond Comments:

- The City requests that baggage handling at Main Street Station be carried forward into the SDP as part of examining the design option. This will provide an opportunity to fully and appropriately analyze any operational impacts associated with baggage handling at Main Street Station. 14
- The City should be made aware of how the 1200' platform might impact service planning decisions for Main Street Station). 15

- **Additional Property Impacts** – Table 7.6-1 (p. 7-14) describes impacts associated with the build alternatives, including the preferred alternative 6F. The impacts include: 3.52 acres of wetlands, .17 acres of parkland, 10 historic properties, 83 acres of right-of-way acquisition, 7 residential relocations and 10 commercial relocations.

City of Richmond Comments:

- The City requests the detailed information on any impacts in the City of Richmond. 16
- The City requests to be informed as DRPT releases any additional information to the community about the scope of the impacts, timing and likely mitigation.

- **New Wye Track** - The recommended preferred alternative includes one proposed new Northeast Regional (SEHSR) daily round trip (two trains) would be added between Washington, D.C. and Richmond, VA. This train would provide for a 6 a.m. northbound Richmond origination and a late-evening southbound arrival back in Richmond. This would allow the other trains from Newport News and Norfolk to operate at more traveler friendly times to improve the attractiveness of the passenger rail service to those cities. To provide for this trip, the preferred alternative includes adding a new wye track near Hospital Street to turn the train.

City of Richmond Comments:

- The City of Richmond requests additional information on the exact location of the wye and any associated impacts (right-of-way, utilities, noise, and/or vibration) in order to help anticipate and proactively communicate with any impacted businesses. 17

- **Project Phasing** – While improvements in Northern Virginia and Washington, DC (Long Bridge) are essential for the corridor, these improvements may take many years to complete and will require substantial financial resources before improvements are addressed in Richmond.

3

CITY OF RICHMOND (continued)

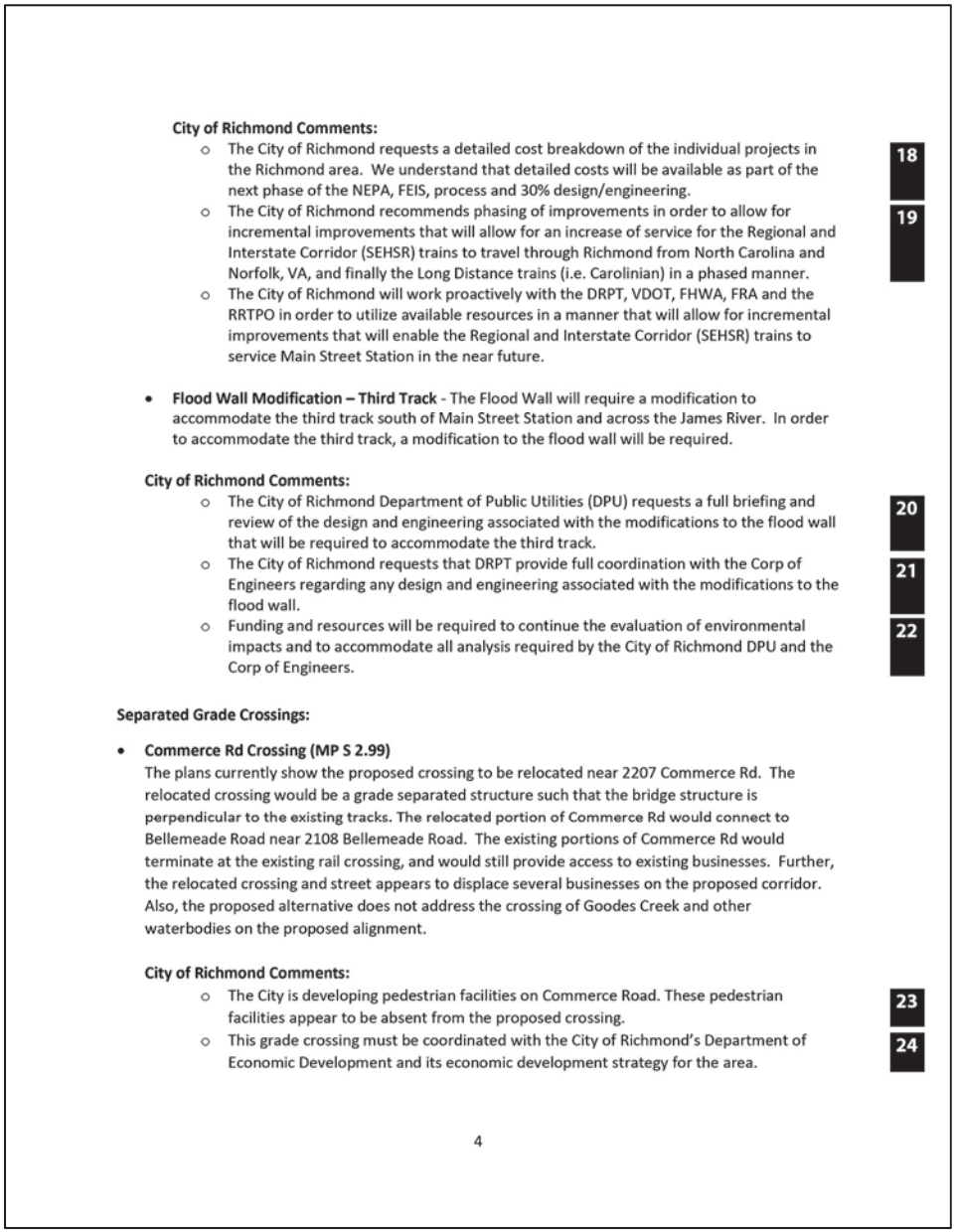
Title VI & Environmental Justice

As noted above, Alternative 6F would provide increased levels of train service to all users at both Main Street Station and Staples Mill Road Station. Section 4.3.6 of the Final EIS clarifies that while Main Street Station site constraints and concerns over potential impacts to cultural resources limit the number of tracks and length of platforms proposed for the station, future passenger service amenities to be provided at the station, such as checked baggage service, are not precluded. Amenities to be provided at each station for a particular passenger service will be determined through coordination between Amtrak, the City of Richmond, and other station stakeholders when the service is implemented, and are not included as part of the DC2RVA Project.

16. Chapter 5 of the Final EIS provides potential Project impacts of the Preferred Alternative in the City of Richmond.

    DRPT has met with the City and its adjacent localities, including Hanover County, Henrico County, and Chesterfield County, plus the Richmond Area Metropolitan Planning Organization on several occasions throughout the development of the Draft EIS. DRPT commits to coordinate with the City during final design, after funding becomes available and a construction schedule is established, for work within the City.

17. The location of the proposed wye has been modified since the Draft EIS, in coordination with FRA, DRPT, CSXT, and the City of Richmond. Section 4.4.6 of the Final EIS summarizes the location of the proposed wye, with further details on the rationale provided in Appendix J of the Final EIS.



City of Richmond Comments:

- The City of Richmond requests a detailed cost breakdown of the individual projects in the Richmond area. We understand that detailed costs will be available as part of the next phase of the NEPA, FEIS, process and 30% design/engineering. 18
- The City of Richmond recommends phasing of improvements in order to allow for incremental improvements that will allow for an increase of service for the Regional and Interstate Corridor (SEHSR) trains to travel through Richmond from North Carolina and Norfolk, VA, and finally the Long Distance trains (i.e. Carolinian) in a phased manner. 19
- The City of Richmond will work proactively with the DRPT, VDOT, FHWA, FRA and the RRTPO in order to utilize available resources in a manner that will allow for incremental improvements that will enable the Regional and Interstate Corridor (SEHSR) trains to service Main Street Station in the near future.

- **Flood Wall Modification – Third Track** - The Flood Wall will require a modification to accommodate the third track south of Main Street Station and across the James River. In order to accommodate the third track, a modification to the flood wall will be required.

City of Richmond Comments:

- The City of Richmond Department of Public Utilities (DPU) requests a full briefing and review of the design and engineering associated with the modifications to the flood wall that will be required to accommodate the third track. 20
- The City of Richmond requests that DRPT provide full coordination with the Corp of Engineers regarding any design and engineering associated with the modifications to the flood wall. 21
- Funding and resources will be required to continue the evaluation of environmental impacts and to accommodate all analysis required by the City of Richmond DPU and the Corp of Engineers. 22

Separated Grade Crossings:

- **Commerce Rd Crossing (MP S 2.99)**
  The plans currently show the proposed crossing to be relocated near 2207 Commerce Rd. The relocated crossing would be a grade separated structure such that the bridge structure is perpendicular to the existing tracks. The relocated portion of Commerce Rd would connect to Bellemeade Road near 2108 Bellemeade Road. The existing portions of Commerce Rd would terminate at the existing rail crossing, and would still provide access to existing businesses. Further, the relocated crossing and street appears to displace several businesses on the proposed corridor. Also, the proposed alternative does not address the crossing of Goodes Creek and other waterbodies on the proposed alignment.

City of Richmond Comments:

- The City is developing pedestrian facilities on Commerce Road. These pedestrian facilities appear to be absent from the proposed crossing. 23
- This grade crossing must be coordinated with the City of Richmond's Department of Economic Development and its economic development strategy for the area. 24

4

CITY OF RICHMOND (continued)

18. and 19. As the City states, more detailed cost estimates will be developed at each phase of the Project. DRPT anticipates that the DC2RVA Project will be implemented incrementally, as funding becomes available, for phasing improvements and for increasing passenger rail service. While a Project implementation plan would be developed as part of the Corridor Service Development Plan for the Project, final design and construction of would be contingent on funding availability. Refer to Chapter 7 of the Final EIS for full summary of these future steps of the Project.

20. DRPT has met with the City on several occasions throughout the development of the Draft and Final EIS. DRPT commits to coordinate with the City during final design, after funding becomes available and a construction schedule is established, for work within the City.

21. DRPT has met and coordinated with the US Army Corps of Engineers (USACE) on several occasions throughout the development of the Draft and Final EIS. DRPT commits to coordinate with the City and other stakeholders during final design, after funding becomes available and a construction schedule is established, for work within the City. Coordination with the USACE would be undertaken, as appropriate, during the final design phase should any modifications to the flood wall become necessary.

22. Funding for the current DC2RVA Tier II EIS is from an FRA grant with the Commonwealth of Virginia and CSXT railroad providing the local match to the grant. At the conclusion of the Tier II EIS process, the goal is to have successfully completed the NEPA process to meet federal requirements and qualify for federal funding for the DC2RVA Project. DRPT anticipates the DC2RVA Project will be implemented incrementally, as funding becomes available. A construction timeline will be established as funding becomes available in the future.

(Responses are continued on next page)

City of Richmond Comments:

- The City of Richmond requests a detailed cost breakdown of the individual projects in the Richmond area. We understand that detailed costs will be available as part of the next phase of the NEPA, FEIS, process and 30% design/engineering. 18
- The City of Richmond recommends phasing of improvements in order to allow for incremental improvements that will allow for an increase of service for the Regional and Interstate Corridor (SEHSR) trains to travel through Richmond from North Carolina and Norfolk, VA, and finally the Long Distance trains (i.e. Carolinian) in a phased manner. 19
- The City of Richmond will work proactively with the DRPT, VDOT, FHWA, FRA and the RRTPO in order to utilize available resources in a manner that will allow for incremental improvements that will enable the Regional and Interstate Corridor (SEHSR) trains to service Main Street Station in the near future.

- **Flood Wall Modification – Third Track** - The Flood Wall will require a modification to accommodate the third track south of Main Street Station and across the James River. In order to accommodate the third track, a modification to the flood wall will be required.

City of Richmond Comments:

- The City of Richmond Department of Public Utilities (DPU) requests a full briefing and review of the design and engineering associated with the modifications to the flood wall that will be required to accommodate the third track. 20
- The City of Richmond requests that DRPT provide full coordination with the Corp of Engineers regarding any design and engineering associated with the modifications to the flood wall. 21
- Funding and resources will be required to continue the evaluation of environmental impacts and to accommodate all analysis required by the City of Richmond DPU and the Corp of Engineers. 22

Separated Grade Crossings:

- **Commerce Rd Crossing (MP S 2.99)**
  The plans currently show the proposed crossing to be relocated near 2207 Commerce Rd. The relocated crossing would be a grade separated structure such that the bridge structure is perpendicular to the existing tracks. The relocated portion of Commerce Rd would connect to Bellemeade Road near 2108 Bellemeade Road. The existing portions of Commerce Rd would terminate at the existing rail crossing, and would still provide access to existing businesses. Further, the relocated crossing and street appears to displace several businesses on the proposed corridor. Also, the proposed alternative does not address the crossing of Goodes Creek and other waterbodies on the proposed alignment.

City of Richmond Comments:

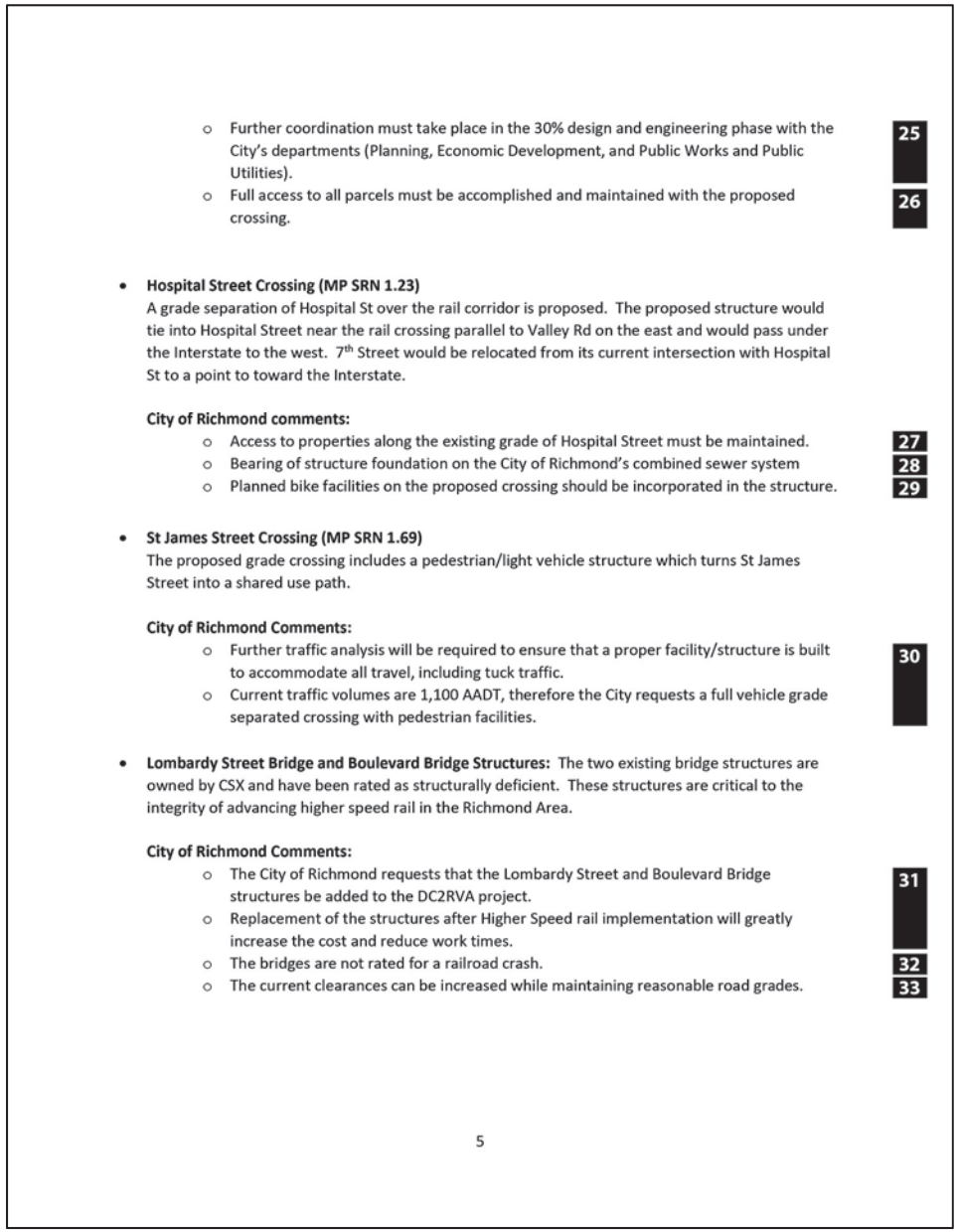
- The City is developing pedestrian facilities on Commerce Road. These pedestrian facilities appear to be absent from the proposed crossing. 23
- This grade crossing must be coordinated with the City of Richmond's Department of Economic Development and its economic development strategy for the area. 24

4

CITY OF RICHMOND (continued)

23. DRPT has met with the City on several occasions throughout the development of the Draft and Final EIS. Conceptual designs of Commerce Road do not preclude the development of pedestrian facilities. Pedestrian facilities may be incorporated in the final design of Commerce Road. DRPT commits to coordinate with the City during final design, after funding becomes available and a construction schedule is established, for work within the City.

24. and 25. DRPT commits to coordinate with the City during final design, after funding becomes available and a construction schedule is established, for work within the City.



- Further coordination must take place in the 30% design and engineering phase with the City's departments (Planning, Economic Development, and Public Works and Public Utilities). 25
- Full access to all parcels must be accomplished and maintained with the proposed crossing. 26

- **Hospital Street Crossing (MP SRN 1.23)**
  A grade separation of Hospital St over the rail corridor is proposed. The proposed structure would tie into Hospital Street near the rail crossing parallel to Valley Rd on the east and would pass under the Interstate to the west. 7th Street would be relocated from its current intersection with Hospital St to a point to toward the Interstate.

  City of Richmond comments:
  - Access to properties along the existing grade of Hospital Street must be maintained. 27
  - Bearing of structure foundation on the City of Richmond's combined sewer system 28
  - Planned bike facilities on the proposed crossing should be incorporated in the structure. 29

- **St James Street Crossing (MP SRN 1.69)**
  The proposed grade crossing includes a pedestrian/light vehicle structure which turns St James Street into a shared use path.

  City of Richmond Comments:
  - Further traffic analysis will be required to ensure that a proper facility/structure is built to accommodate all travel, including tuck traffic. 30
  - Current traffic volumes are 1,100 AADT, therefore the City requests a full vehicle grade separated crossing with pedestrian facilities.

- **Lombardy Street Bridge and Boulevard Bridge Structures:** The two existing bridge structures are owned by CSX and have been rated as structurally deficient. These structures are critical to the integrity of advancing higher speed rail in the Richmond Area.

  City of Richmond Comments:
  - The City of Richmond requests that the Lombardy Street and Boulevard Bridge structures be added to the DC2RVA project. 31
  - Replacement of the structures after Higher Speed rail implementation will greatly increase the cost and reduce work times.
  - The bridges are not rated for a railroad crash. 32
  - The current clearances can be increased while maintaining reasonable road grades. 33

5

CITY OF RICHMOND (continued)

(Response to comment 25 on previous page)

26. and 27. The conceptual designs for improvements considered in the Draft and Final EIS include maintaining parcel access or indicating impacts to parcels where access is realigned, relocated, or removed. Additional review of parcel access will be performed for all recommended grade separations, including studies for frontage roads, as part of the final design, after funding becomes available and this phase of the incremental improvements are scheduled.

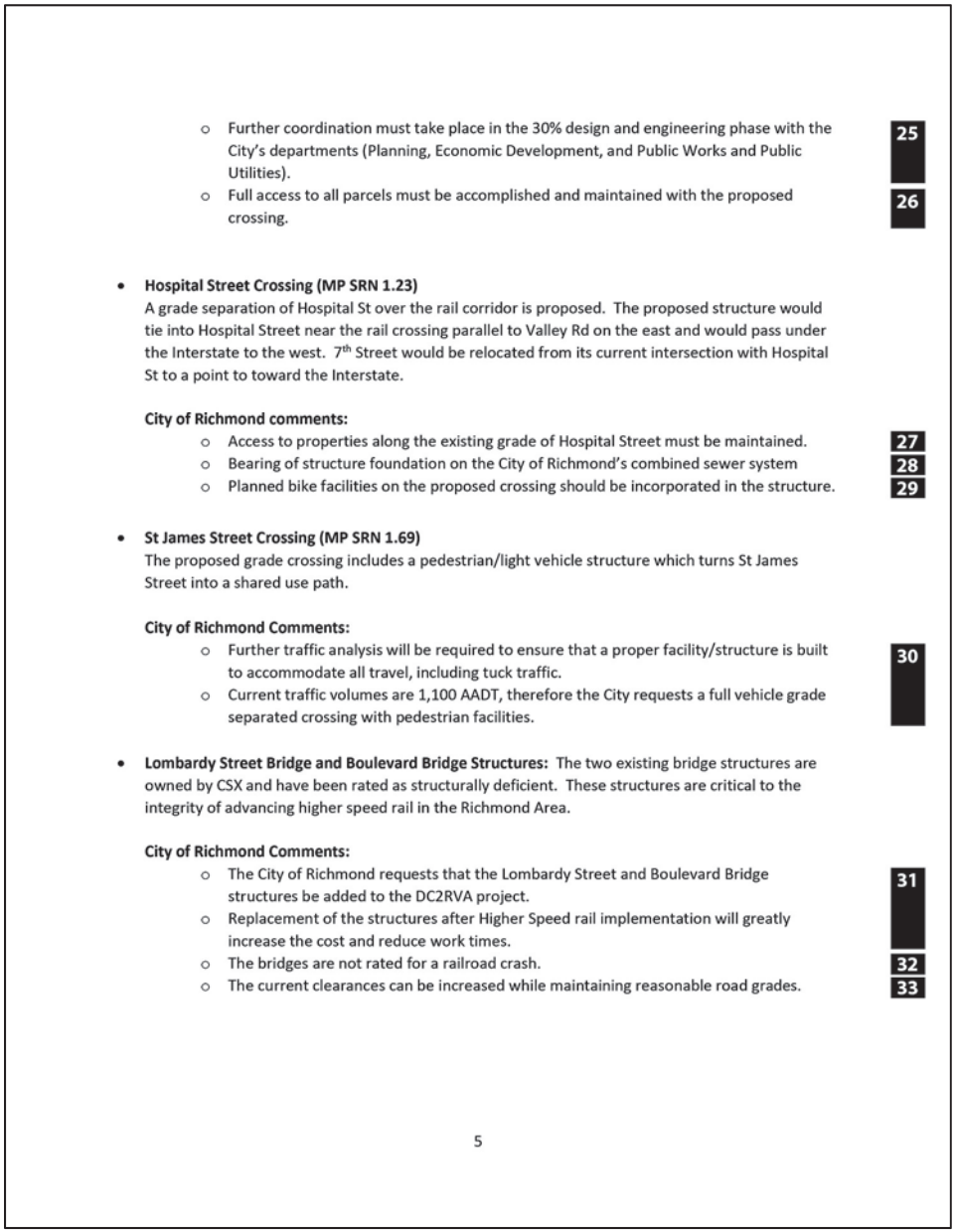
28. Additional subsurface investigations and structural analyses will be performed for all proposed structures as part of final design, after funding becomes available and incremental improvements are scheduled.

29. The Preferred Alternative maintains existing bicycle and pedestrian facilities (provided in-kind, i.e., to the same level of existing treatment) throughout the Project corridor. The conceptual design of Hospital Street was based on existing conditions at the time of development, and do not preclude future development of bike facilities. Bike facilities may be incorporated in the final design of Hospital Street, after funding becomes available and this phase of the incremental improvements are scheduled.

30. The Draft EIS includes a traffic queuing analysis at all grade crossings (see Section 4.15.2); the analyses provided are sufficient for the level of conceptual engineering level completed for environmental analysis. FHWA criteria indicates that the crossing does not meet the threshold to consider a grade separation. Additionally, there is an existing grade separation within one mile of this crossing with good connectivity through the existing roadway network, making this crossing a candidate for closure. DC2RVA conceptual designs do not preclude the construction of a full grade separation with automobile, pedestrian, and truck access by the City.

    Additional review of traffic data to update traffic conditions will be performed for at-grade crossings, including those recommended for grade separation, as part of final design after funding becomes available and a construction schedule can be established.

(Responses are continued on next page)



- Further coordination must take place in the 30% design and engineering phase with the City's departments (Planning, Economic Development, and Public Works and Public Utilities). 25
- Full access to all parcels must be accomplished and maintained with the proposed crossing. 26

- **Hospital Street Crossing (MP SRN 1.23)**
  A grade separation of Hospital St over the rail corridor is proposed. The proposed structure would tie into Hospital Street near the rail crossing parallel to Valley Rd on the east and would pass under the Interstate to the west. 7th Street would be relocated from its current intersection with Hospital St to a point to toward the Interstate.

  City of Richmond comments:
  - Access to properties along the existing grade of Hospital Street must be maintained. 27
  - Bearing of structure foundation on the City of Richmond's combined sewer system 28
  - Planned bike facilities on the proposed crossing should be incorporated in the structure. 29

- **St James Street Crossing (MP SRN 1.69)**
  The proposed grade crossing includes a pedestrian/light vehicle structure which turns St James Street into a shared use path.

  City of Richmond Comments:
  - Further traffic analysis will be required to ensure that a proper facility/structure is built to accommodate all travel, including tuck traffic. 30
  - Current traffic volumes are 1,100 AADT, therefore the City requests a full vehicle grade separated crossing with pedestrian facilities.

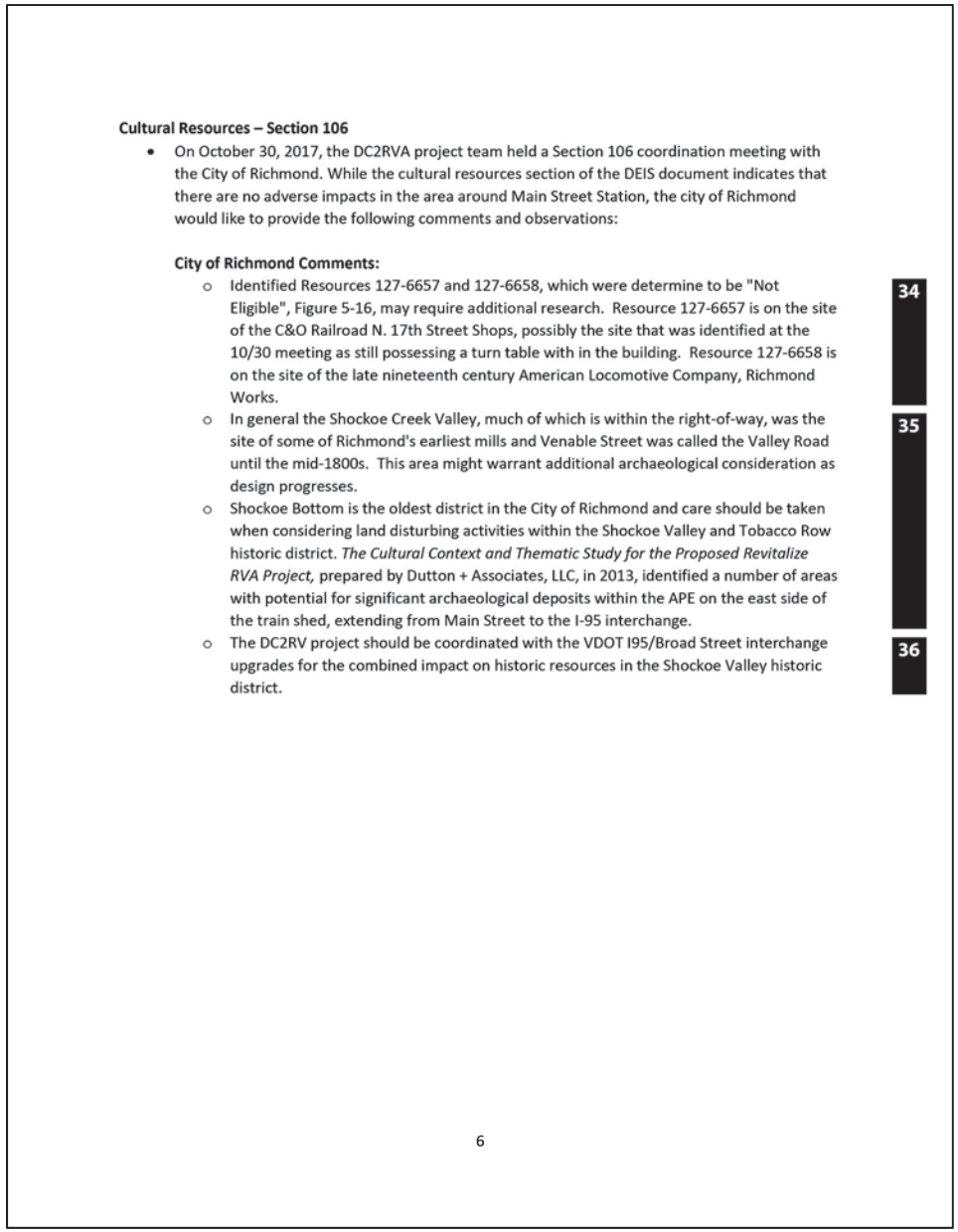
- **Lombardy Street Bridge and Boulevard Bridge Structures:** The two existing bridge structures are owned by CSX and have been rated as structurally deficient. These structures are critical to the integrity of advancing higher speed rail in the Richmond Area.

  City of Richmond Comments:
  - The City of Richmond requests that the Lombardy Street and Boulevard Bridge structures be added to the DC2RVA project. 31
  - Replacement of the structures after Higher Speed rail implementation will greatly increase the cost and reduce work times.
  - The bridges are not rated for a railroad crash. 32
  - The current clearances can be increased while maintaining reasonable road grades. 33

5

CITY OF RICHMOND (continued)

31. to 33. DRPT considered existing track clearances and requirements for protecting existing structures where proposed improvements do not impact the existing infrastructure. The existing Lombardy Street Bridge and Boulevard Bridge do not require rehabilitation or replacement to fulfill the Purpose and Need for the DC2RVA Project. DC2RVA conceptual designs do not preclude rehabilitation or replacement of the Lombardy Street Bridge or the Boulevard Bridge by the City or CSXT. The need for crash walls to protect existing bridge piers will be determined during final design.



Cultural Resources – Section 106

- On October 30, 2017, the DC2RVA project team held a Section 106 coordination meeting with the City of Richmond. While the cultural resources section of the DEIS document indicates that there are no adverse impacts in the area around Main Street Station, the city of Richmond would like to provide the following comments and observations:

City of Richmond Comments:

- Identified Resources 127-6657 and 127-6658, which were determine to be "Not Eligible", Figure 5-16, may require additional research. Resource 127-6657 is on the site of the C&O Railroad N. 17th Street Shops, possibly the site that was identified at the 10/30 meeting as still possessing a turn table with in the building. Resource 127-6658 is on the site of the late nineteenth century American Locomotive Company, Richmond Works. 34
- In general the Shockoe Creek Valley, much of which is within the right-of-way, was the site of some of Richmond's earliest mills and Venable Street was called the Valley Road until the mid-1800s. This area might warrant additional archaeological consideration as design progresses. 35
- Shockoe Bottom is the oldest district in the City of Richmond and care should be taken when considering land disturbing activities within the Shockoe Valley and Tobacco Row historic district. *The Cultural Context and Thematic Study for the Proposed Revitalize RVA Project,* prepared by Dutton + Associates, LLC, in 2013, identified a number of areas with potential for significant archaeological deposits within the APE on the east side of the train shed, extending from Main Street to the I-95 interchange.
- The DC2RV project should be coordinated with the VDOT I95/Broad Street interchange upgrades for the combined impact on historic resources in the Shockoe Valley historic district. 36

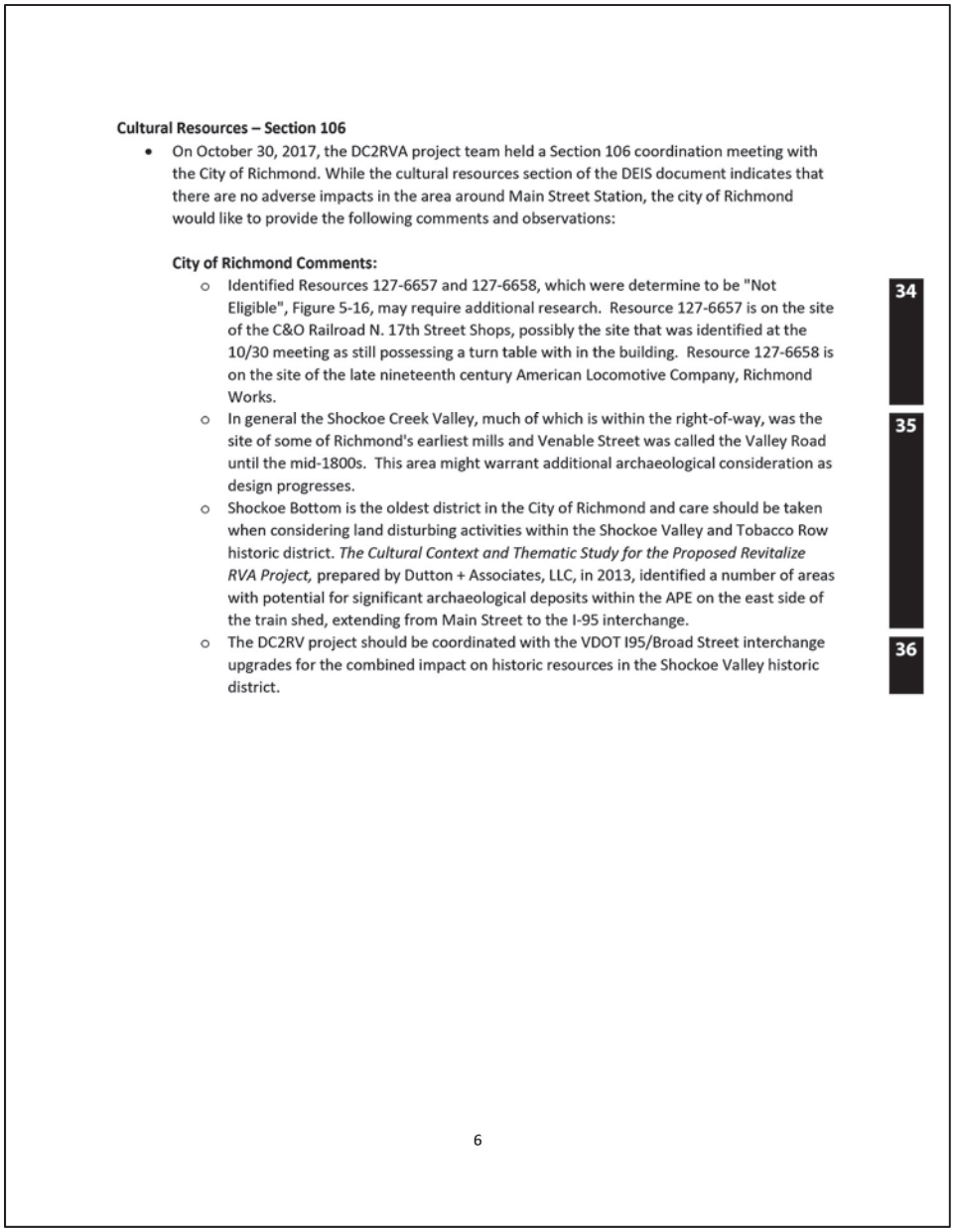
6

CITY OF RICHMOND (continued)

34. The Project requires compliance with the National Historic Preservation Act of 1966, requiring that project plans take into consideration potential effects on historic properties. Resources 127-6657 and 127-6658 were preliminarily recorded during architectural studies associated with the Project in 2016, and the building was the subject of additional investigation in 2017/2018. In addition, the parcel was studied for potentially intact archaeological remains in 2018. Upon review of the data, DHR determined that these resources are not individually eligible for the National Register of Historic Places. As such, they are not listed as a historic property in the Final EIS. However, properties were noted during the planning process, and DRPT removed the need for modifications to this property by eliminating planned construction for a wye in this area; refer to Appendix J of the Final EIS for details on the revised Richmond area turning wye and service yard location that is part of the Preferred Alternative, which is also summarized in Section 4.6 of the Final EIS. Technical reports detailing cultural resource studies can be found in Appendix D of the Final EIS.

35. The FRA and DRPT fully understand the sensitivity and significance of the Shockoe Bottom area, and in particular the area slated for the Memorial Park. DRPT reviewed prior studies that recorded and evaluated archaeological and architectural properties in this area have been ongoing since 2006. Resources in Shockoe Bottom including the proposed Memorial Park area are discussed in Chapters 3, 5, and 6 of the Final EIS and within several reports in Appendix D (cultural resource technical reports). Throughout the studies and agency and public consultation, the historic places located in this area have been taken into consideration during Project planning. This includes Lumpkins Jail/Devil's Half Acre and the Burial Ground, among others. The Project does not impact the known boundaries of these sites. At the request of several consulting parties, Lumpkins Jail site was added to the list of historic properties. The DHR determined that the Project will have no adverse effect on the site as no impacts will occur as part of the Project. The history of Shockoe Bottom and the slave trade are included in the Section 106 Draft Memorandum of Agreement to mitigate adverse effects on historic properties (Appendix K of the Final EIS).

(Responses are continued on next page)



Cultural Resources – Section 106

- On October 30, 2017, the DC2RVA project team held a Section 106 coordination meeting with the City of Richmond. While the cultural resources section of the DEIS document indicates that there are no adverse impacts in the area around Main Street Station, the city of Richmond would like to provide the following comments and observations:

City of Richmond Comments:

- Identified Resources 127-6657 and 127-6658, which were determine to be "Not Eligible", Figure 5-16, may require additional research. Resource 127-6657 is on the site of the C&O Railroad N. 17th Street Shops, possibly the site that was identified at the 10/30 meeting as still possessing a turn table with in the building. Resource 127-6658 is on the site of the late nineteenth century American Locomotive Company, Richmond Works.
- In general the Shockoe Creek Valley, much of which is within the right-of-way, was the site of some of Richmond's earliest mills and Venable Street was called the Valley Road until the mid-1800s. This area might warrant additional archaeological consideration as design progresses.
- Shockoe Bottom is the oldest district in the City of Richmond and care should be taken when considering land disturbing activities within the Shockoe Valley and Tobacco Row historic district. *The Cultural Context and Thematic Study for the Proposed Revitalize RVA Project,* prepared by Dutton + Associates, LLC, in 2013, identified a number of areas with potential for significant archaeological deposits within the APE on the east side of the train shed, extending from Main Street to the I-95 interchange.
- The DC2RV project should be coordinated with the VDOT I95/Broad Street interchange upgrades for the combined impact on historic resources in the Shockoe Valley historic district.

34

35

36

6

CITY OF RICHMOND (continued)

36. Potential construction elements of the I-95/Broad Street Interchange Improvements and VDOT studies on historic resources in Shockoe Valley associated with this undertaking were taken into consideration as background data and to assure consistent methodologies and resource evaluations. Chapter 3 of the Final EIS includes the results of the background review completed as part of the Project including details on the Shockoe Bottom area and I-95 street improvements as they relate to the current Project area. Additionally, the referenced project has been added to the indirect and cumulative effects section, both in terms of potential impacts on land use and historic properties; refer to Section 5.20 of the Final EIS.

    DRPT has defined the scope of improvements proposed for the DC2RVA Project, including Main Street Station, to include the minimum amount of infrastructure required to deliver the service improvements proposed under the Project. This includes the removal of the proposed parking structure at Main Street Station in the Final EIS; instead of the parking structure, DRPT will work with the City to develop a parking plan for Main Street Station that is incorporated into City plans for Shockoe Bottom and Downtown Richmond.