D APPENDIX D: COMMENTS RECEIVED FOR THE RECORD

- Comment Log
- Comments Received for the Record
- Testimony Recorded at the Public Hearing

UPDATED: June 26, 2012

Comment Number	Comment Type (Letter, E-Mail, Testimony)	Date Received	Last Name	First Name	Organization	Address 1	Address 2	City	State	Zip Code	Notes
001	E-Mail	06/02/2012	Sawislak	Josh							
002	E-Mail	06/06/2012	Holma	Marc	Department of Historic Resources	2801 Kensington Avenue		Richmond	VA	23221	
003	Written Statement	06/13/2012	Rosenbloom	Tim							
004	Testimony	06/13/2012	Sawislak	Josh							
005	Testimony	06/13/2012	Fairfield	Jeff	Ruth and Hal Launders Charitable Trust						
006	Testimony	06/13/2012	Parnes	Jeffrey							
007	Testimony	06/13/2012	Cohn	Timothy							
008	E-Mail	06/18/2012	Tennyson	E.L.							
009	Letter	06/18/2012	Irons	Ellie	Department of Environmental Quality	629 East Main Street		Richmond	VA	23219	
010	E-Mail	06/19/2012	Burrill	Michael	Urban Visions						
011	Letter	06/22/2012	Canale	Mark	Fairfax County Department of Transportation	4050 Legato Road	Suite 400	Fairfax	VA	22033	
012	Letter	06/22/2012	Meurlin	Keith	Washington Airports Task Force						
013	E-Mail	06/24/2012	Dayton	Dennis							
014	E-Mail	06/25/2012	Whitfield	Robert	Dulles Corridor Users Group						

[redacted]

June 2, 2012

Mr. Karl A. Rohrer, AICP
Deputy Director—Phase 2
Dulles Corridor Metrorail Project
1593 Spring Hill Road
Suite 300
Vienna, Virginia 22182

Subject: Comments on Phase 2 Environmental Assessment and Section 106 Determination—Dulles Corridor Metrorail Project

Dear Mr. Rohrer:

Please accept this letter as my written comments on the Preliminary Engineering Design Refinements Environmental Assessment (EA) for Phase 2 of the Dulles Corridor Metrorail Project. My overall comment is that I support the Refined LPA because it provides the best balance of transportation, environmental, and fiscal issues. I encourage MWAA and FTA to move with all haste to complete the NEPA process and build the Refined LPA.

I have limited my comments specifically to the Airport Station and will address three issues: general station planning, Section 106 determination, and Section 4(f) use. Before I cover my specific comments, I would like to congratulate you and your team on the comprehensive and useful documents prepared in support of the design and NEPA process. I found your reports, renderings, and maps to be excellent and critical to my review and understanding of the proposed action and the design refinements. As you know, I am painfully aware of the effort and coordination that is required for this project, and your team has done an outstanding job of presenting this material.

General Station Planning:

There has been much public discussion about the benefits and impacts of an underground vs. above ground Metrorail station at Dulles Airport. I have engaged in some of that debate and summarize my position here for the NEPA record. I support the construction of an aerial station at Dulles Airport because I do not believe that the very limited benefits and potential impacts of an underground station

compensate for the colossal increase in cost and risk to build underground. I dispute the argument that an underground station is a critical passenger comfort issue as less than half of the stations on the existing Metrorail system are underground (including the only other airport station in the system). At grade or aerial airport stations exist at major world airports such as New York (JFK), Paris (CDG), Geneva (GVA), Lyon (LYS), and Hong Kong (HKG) and are clearly functional and effective given proper design and placement.

It has also been stated that the Refined LPA station requires passengers to walk a greater distance from the Metrorail station to the airport terminal. While this is technically accurate, it should be noted that the additional distance is via a protected underground walkway with a moving sidewalk. Total travel time for a rail passenger between the train and the departure gate (as opposed to terminal entrance) is negligible and is a more appropriate metric.

In general, I find that the Refined LPA station provides an equivalent level service to the underground station and is significantly superior from the visual aspect of the rail passenger. Visual impacts and benefits are discussed in the next section.

Section 106 Determination/Visual Effects:

The design concept proposed for the aerial station in the Refined LPA is functional, respectful, and complimentary to the historic Saarinen terminal. Rather than creating additional adverse effects, the station design actually reduces the visual impact of Parking Garage 1 (north garage) on the historic terminal by adding an element of complimentary design to the visual landscape. While both the LPA and the Refined LPA have adverse effects, the Refined LPA is the lesser of the two because of its improvement of the main view shed of the terminal. The impact on the peek-a-boo sequence is minor and does not constitute a major change from the visual impact of the service roadway bridge.

The discussion above deals with visual impacts to the airport passenger arriving by air (departing the terminal) or arriving by car or bus. For passengers arriving by train, the Refined LPA is a significant improvement over the LPA because it allows these passengers to share the visual introduction to the airport designed by Mr. Saarinen. Under the LPA, rail passengers would arrive at the terminal underground and enter the terminal from an underground walkway without ever experiencing the visual grandeur of the historic Saarinen terminal.

The significant improvement to the experience of rail passengers, the use of complimentary design elements in the station design, and the mitigation proposed in the Refined LPA, make a clear case that this scheme is more protective of this important historic resource and ensures all passengers arriving by ground to the airport are given an opportunity to share Mr. Saarinen's vision of jet air travel.

Section 4(f) Use:

I concur with the EA's finding that both the LPA and the Refined LPA include a use of a historic resource protected under Section 4(f). However, as discussed in the section above, I find that the impact of that use is lessened by the design concept proposed in the Refined LPA and the fact that the aerial station allows all ground arriving passengers and employees an opportunity to view the station upon arrival. For these reasons, I find that the Refined LPA provides a partial mitigation of the use proposed in the 2004 LPA.

I ask that my comments be considered as part of the NEPA process and urge MWAA and FTA to select the Refined LPA as the proposed action.

Respectfully submitted,

Josh Sawislak, AICP

COMMONWEALTH of VIRGINIA

Department of Historic Resources

Douglas W. Domenech
Secretary of Natural Resources

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6 June 2012

Mr. Karl A. Rohrer
Dulles Corridor Metrorail Project
Metropolitan Washington Airports Authority
1595 Spring Hill Road, Suite 300
Vienna, Virginia 22182

Re: Dulles Corridor Metrorail Project Phase 2—Environmental Assessment
Fairfax and Loudoun Counties
DHR File # 2000-1061

Dear Mr. Rohrer:

The Department of Historic Resources (DHR) has received for our review and comment the revised "Dulles Metrorail Project, Phase 2, Preliminary Engineering Design Refinements, Environmental Assessment" (April 2012). The document describes the expected environmental consequences, to include those to significant architectural and archaeological resources, resulting from the construction of Phase 2 of the Dulles Corridor Metrorail project, which extends from the Wiehle Avenue station tail tracks and terminates in eastern Loudoun County at Route 772. Included in this phase is the section of rail line that traverses Dulles International Airport with the construction of an aerial station on along the southern elevation of the North Garage, across Saarinen Circle from the historic terminal building. This proposal is identified in the Environmental Assessment (EA) as the "Refined Locally Preferred Alternative" (RLPA).

Through the process outlined in Section 106 of the National Historic Preservation Act, as amended, and its implementing regulation 36 CFR Part 800, the Federal Transit Administration (FTA) and Metropolitan Washington Airports Authority (MWAA) determined, with concurrence from DHR, that the RLPA will have an Adverse Effect on the Dulles Airport Historic District and archaeological site 44LD1956, both of which are resources eligible for listing in the National Register of Historic Places (NRHP). In the case of the Dulles Airport Historic District, the introduction of the new, incompatible visual elements, i.e. the aerial guideway and station, into the historic district, the destruction of one of the remaining Saarinen "peek-a-boo" approach views of the historic terminal, and physical encroachment into the Dan Kiley-designed landscape

by support piers from the aerial station. Concerning the prehistoric archaeological site 44LD1956, construction of RLPA will result in its partial destruction.

The FTA and MWAA have been consulting with DHR and other parties to develop a Memorandum of Agreement (MOA) that will include specific strategies to mitigate the adverse effects caused by the undertaking. The DHR anticipate that this consultation will continue until an acceptable MOA can be signed. We request that FTA and MWAA continue to work with this agency and the other consulting parties in order to realize this goal.

If you have any questions about our comments, please call me at (804) 482-6090.

Sincerely,

Marc Holma, Architectural Historian
Office of Review and Compliance

R12-01
Tim Rosebloom

DULLES CORRIDOR METRORAIL PROJECT

METROPOLITAN WASHINGTON AIRPORTS AUTHORITY

metro

Phase 2

Dulles Corridor Metrorail Project Environmental Assessment Public Hearing

Comments

I SUPPORT THIS PROJECT & THINK PHASE 2 EXTENSION OF HEAVY RAIL (METRO RAIL) IS VERY IMPORTANT CURRENTLY LIVE IN ARLINGTON ALONG ORANGE LINE AND MAKE OCASSIONAL TRIPS TO DULLES AIRPORT. WOULD NOT USE TRANSIT IF REQUIRED TRANSFER TO BUS ALTERNATIVE. WOULD USE TAXI CABS, CARPOOL OR DRIVE ALONE.

ALSO WORKED AS PLANNER IN PRINCE WILLIAM COUNTY AND METRORAIL EXTENSION TO DULLES AIRPORT WAS VERY IMPORTANT TO COUNTY TRANSIT PLANS. ONE SEAT RIDE FROM ROSSLYN-BALLSTON WAS VERY IMPORTANT AS OMNI RIDE SERVICE FROM EASTERN PWC FOCUSES ON PENTAGON AND ENDS AT BALLSTON.

FEEL THAT THIS PROJECT IS WORTH PUBLIC INVESTMENT, INCLUDING FEDERAL FUNDS & COMMONWEALTH OF VA.

I REALLY LIKE THE NEW STATION NAMES! GOOD JOBS FFC STAFF!

E.L. TENNYSON, P.E.
[redacted]

REGISTERED
PROFESSIONAL ENGINEER

[redacted]

Mr. Karl A. Rohrer,
Deputy Director, MetroRail Phase 2
Metropolitan Washington Airports Authority,
15 93 Spring Hill Road, suite 300
Vienna, VA. 22182 - 2228

June 14, 2012

Dear Mr. Rohrer:

Pursuant to public hearing docket R-12-01 instructions, I am submitting this statement for the record pertaining to the Dulles Corridor Rail Project, Phase 2, Preliminary Engineering Refinements and Environmental Assessment. I signed up to speak, but I waived that opportunity as three minutes would not do it, and I agreed with what I heard on June 13th.

The refinements will not seriously change or disrupt the basic project environmental benefits. Audited motor fuel sales prove that Fairfax County is consuming only 388 gallons of motor fuel per capita, despite Virginia's consumption of 645 such gallons. Metro-Rail (with a little help from Va.Ry.Ex.) with just 5.5 Fairfax County stations is saving 186 gallons of motor fuel per capita per year worth $ 700 million per year at the pump.

Not only does this reduce air pollution markedly but it cuts our balance of payments deficit for buying foreign petroleum. Arlington County, with far more MetroRail stations than Fairfax County, is consuming only 288 gallons of motor fuel annually per capita. It is obvious that more than doubling the number of Fairfax County MetroRail stations will further reduce petroleum consumption to save more money and clean more air. The Dulles Silver Line will be moving 225 million annual passenger-miles of travel saving an additional 10 million gallons of motor fuel worth $ 35 million per year. Phase 2 will encourage Transit Oriented Development in Loudoun County, augmenting the savings just estimated.

Because of these huge motor fuel savings, the construction of transit power sub-stations and parking facilities will have a great net beneficial impact on the environment. Storm water run-off from the parking lots will not help, but retention ponds will mitigate this problem leaving all of us very far ahead environmentally. The railway right-of-way will be ballasted for the most part, which allows water to sink in rather than run off, as it does on highways. A very **few** people may have to see benign parking facilities and sub-stations so that **all** people can have less pollution and run-off which is fouling our waterways.

Phase 2 will also help balance our governmental budgets. Northern Virginia is very short of highway capacity for radial trips to and from the center of activity. It is estimated that Phase 2 will add enough rail travel to Phase 1 to move 3,000 more persons per peak hour by rail at the maximum load point, avoiding the destructive need to construct four more lanes of limited access highway in areas where there is neither land nor money to build them. Even if the construction of such highway lanes were possible, their environmental impact would be grossly negative.

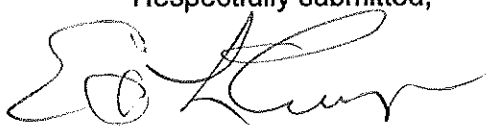
MetroRail, in 2010, according to the Federal Transit Administration, moved people with a modest operating subsidy of only 18 cents per passenger-mile, compared to a $ 1.12

subsidy for MetroBus and 70 cents for Fairfax Connector bus. The Connector has fewer retirees to pension so saves some money there but it may not qualify for federal aid under Section 13(c) of the transit labor law. With Dulles Rail expected to move 225 million annual passenger-miles per year, saving 94 cents net on one-third of them is worth $ 70 million per year. Saving 52 cents net on another third riding Fairfax Connector will be worth $ 39 million per year. Saving 17 cents per passenger-mile on the last third driving in autos is worth $ 12.75 million per year, a total saving of $ 121.75 million per year on operating expenses. I have no estimate of the cost of highway expansion avoided, but it would be in the billions.

MetroRail Phase 2 should also save lives. The highway fatality rate is now down to about 0.7 per hundred million annual vehicle miles, which is about 0.6 per commuter passenger-mile. With 225 million annual passenger-miles, we can expect 1.3 highway deaths per year without MetroRail Phases 1 and 2. MetroRail Phases 1 and 2 should cut that to one death every nine years, suicides excepted.

In closing, I want to support the testimony of Jeffrey Parnes who asked for provision of a future bridge at the Innovation Station at Highway 28.

Respectfully submitted,



Registered Professional Engineer
retired from public transit activity
Emeritus Member, Transportation Research Board Committee AP070

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June 14, 2012

Mr. Karl A. Rohrer
Deputy Project Director, Phase 2
Dulles Corridor Metrorail Project
Metropolitan Washington Airports Authority
1593 Spring Hill Road, Suite 300
Vienna, Virginia 22182

RE: Preliminary Engineering Design Refinements Environmental Assessment, Dulles Corridor Metrorail Project, Phase 2; DEQ-12-100F

Dear Mr. Rohrer:

The Commonwealth of Virginia has completed its review of the above-referenced document. The Department of Environmental Quality is responsible for coordinating Virginia's review of federal environmental documents and responding to appropriate federal officials on behalf of the Commonwealth. The following agencies, planning district commission, and localities joined in this review:

Department of Environmental Quality
Department of Conservation and Recreation
Department of Historic Resources
Department of Transportation.

In addition, the following agencies, planning district commission, and localities were invited to comment:

Department of Game and Inland Fisheries
Marine Resources Commission
Northern Virginia Regional Commission
Arlington County
Fairfax County
Loudoun County.

PROJECT DESCRIPTION

The Federal Transit Administration (FTA), Metropolitan Washington Airports Authority (MWAAA), and Washington Metropolitan Area Transit Administration (WMATA), in cooperation with the Federal Aviation Administration (FAA), have prepared an Environmental Assessment (EA) to analyze design refinements for Phase 2 of the Dulles Corridor Metrorail Project, which is intended to extend the existing Metrorail system from the East Falls Church station approximately 23.1 miles to the vicinity of State Route 772 in Loudoun County. Phase 1, under construction, is to extend approximately 11.7 miles along the Dulles Airport Access Highway to Wiehle Avenue, and include five stations. Phase 2 would be approximately 11.4 miles long, including six stations. The EA addresses changes in the Locally Preferred Alternative for Phase 2; this alternative was evaluated in a Final Environmental Impact Statement in December 2004 and an amended Record of Decision in November 2006. (See EA, Abstract and pages 1-1 through 1-2.)

Review History. For the record, Virginia's previous reviews of the Dulles Corridor project include the following:

- DEQ-02-124F, Draft Environmental Impact Statement and Section 4(f) Evaluation, for Dulles Corridor Rapid Transit Project, Virginia comments on Draft mailed August 27, 2002;

- DEQ-03-210F, Supplemental Draft Environmental Impact Statement for Dulles Corridor Rapid Transit Project, Virginia comments mailed December 18, 2003;

- DEQ-04-179F, Federal Consistency Determination for Dulles Corridor Rapid Transit Project, Virginia comments mailed October 27, 2004. On behalf of the Commonwealth, DEQ concurred with this federal consistency certification; and

- DEQ-06-051F Dulles Corridor Metrorail Project, Wiehle Avenue Extension: Environmental Assessment for Preliminary Engineering Design Refinements, Virginia comments mailed April 7, 2006.

DEQ files also contain copies of additional correspondence by the Department of Historic Resources with DRPT regarding the Dulles Corridor project. We did not provide comments on the Final Environmental Impact Statement and Section 4(f) Evaluation, dated December 2004, or on the Public Hearings Report (cover letter dated February 11, 2004).

ENVIRONMENTAL IMPACTS AND MITIGATION

1.Historic Structures and Archaeological Resources. According to the EA (Page 3-24), in the earlier analysis it was determined that the Locally Preferred Alternative (LPA) would result in an "adverse effect" to the Dulles Airport Historic District, which is eligible for the National Register of Historic Places, pursuant to Section 106 of the National

Historic Preservation Act (NHPA) of 1966, as amended (16 U.S.C. 470 et. seq.). The 2004 Memorandum of Agreement (MOA) outlined mitigation measures to address this adverse effect. The Refined LPA requires an updated "determination of effect" analysis due to the introduction of the Dulles Airport aerial alignment and station. Additional coordination with the Department of Historic Resources and consulting parties is being undertaken. Also, the project's Area of Potential Effect (APE) for archaeological resources has changed. The new APE for archaeological resources was subject to at least the same level of archaeological investigations conducted for the Final EIS (Phase IB investigations). Because archaeological sites were identified that were potentially eligible for the National Register, Phase II investigations were conducted to determine potential eligibility.

1(a) Agency Jurisdiction. The Department of Historic Resources (DHR) conducts reviews of projects to determine their effect on historic structures or cultural resources under its jurisdiction. DHR, as the designated State's Historic Preservation Office, ensures that federal actions comply with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation at 36 CFR Part 800. The preservation act requires federal agencies to consider the effects of federal projects on properties that are listed, or eligible for listing, on the National Register of Historic Places. Section 106 also applies if there are any federal involvements, such as licenses, permits, approvals, or funding.

1(b) Agency Comments. DHR indicates that it has been working with MWAA on this project since 2000, and is now reviewing draft memoranda of agreement (MOAs). See "Regulatory and Coordination Needs," item 1, below.

2. Water Quality and Wetlands. According to the EA (Page 3-7), while efforts have been made to avoid or minimize wetland impacts in the development of the PE, the amount of wetland impacts are expected to be higher than what was predicted in the Final EIS. The Refined LPA would result in approximately 5.8 acres of wetland impacts. The Final EIS reported that the LPA would affect 5.2 acres.

2(a) Agency Jurisdiction. The State Water Control Board (SWCB) promulgates Virginia's water regulations, covering a variety of permits to include Virginia Pollutant Discharge Elimination System (VPDES) Permit, Virginia Pollution Abatement Permit, Surface and Groundwater Withdrawal Permit, and the Virginia Water Protection Permit (VWPP). The VWPP is a State permit which governs wetlands, surface water, and surface water withdrawals/impoundments. It also serves as §401 certification of the federal Clean Water Act § 404 permits for dredge and fill activities in waters of the U.S. The VWPP Program is under the Office of Wetlands and Water Protection/Compliance, within the DEQ Division of Water Quality Programs. The six DEQ regional offices perform permit application reviews and issue permits for the covered activities.

2(b) Agency Comments. According to DEQ's Northern Regional Office (DEQ-NRO), the Phase 2 project will affect additional surface waters beyond those contemplated in earlier environmental documents. However, the impacts are consistent with those

permitted under Virginia Water Protection Program (VWPP) Individual Permit No. 11-0193, issued on June 10, 2011.

2(c) Recommendations. In general, DEQ recommends that stream and wetland impacts be avoided to the maximum extent practicable. To minimize unavoidable impacts to wetlands and waterways, DEQ recommends the following practices:

- Operate machinery and construction vehicles outside of stream-beds and wetlands; use synthetic mats when in-stream work is unavoidable.
- Preserve the top 12 inches of trench material removed from wetlands for use as wetland seed and root-stock in the excavated area.
- Erosion and sedimentation controls should be designed in accordance with the most current edition of the Virginia Erosion and Sediment Control Handbook. These controls should be in place prior to clearing and grading, and maintained in good working order to minimize impacts to State waters. The controls should remain in place until the area is stabilized.
- Place heavy equipment, located in temporarily impacted wetland areas, on mats, geotextile fabric, or use other suitable measures to minimize soil disturbance, to the maximum extent practicable.
- Restore all temporarily disturbed wetland areas to pre-construction conditions and plant or seed with appropriate wetlands vegetation in accordance with the cover type (emergent, scrub-shrub, or forested). The applicant should take all appropriate measures to promote re-vegetation of these areas. Stabilization and restoration efforts should occur immediately after the temporary disturbance of each wetland area instead of waiting until the entire project has been completed.
- Place all materials which are temporarily stockpiled in wetlands, designated for use for the immediate stabilization of wetlands, on mats, geotextile fabric in order to prevent entry in State waters. These materials should be managed in a manner that prevents leachates from entering state waters and must be entirely removed within thirty days following completion of that construction activity. The disturbed areas should be returned to their original contours, stabilized within thirty days following removal of the stockpile, and restored to the original vegetated state.
- All non-impacted surface waters within the project or right-of-way limits that are within 50 feet of any clearing, grading, or filling activities should be clearly flagged or marked for the life of the construction activity within that area. The project proponent should notify all contractors that these marked areas are surface waters where no activities are to occur.
- Measures should be employed to prevent spills of fuels or lubricants into state waters.

2(d) Requirements. Surface water or wetland impacts may require authorization from DEQ-NRO under the VWPP program prior to any land disturbance. In the event that the size and scope of the project should change, a modification of the individual permit may be required. See "Regulatory and Coordination Needs," item 2, below.

The initiation of the VWPP review process is accomplished through the submission of a Joint Permit Application (JPA) (form MRC 30-300) to the Virginia Marine Resources Commission (VMRC). Upon receipt of a JPA for the proposed surface waters impacts, VWPP staff at DEQ-NRO will review the proposed project in accordance with the VWPP program regulations and guidance.

3. Air Quality. The EA (page 3-5) states that the ridership projections prepared for the LPA in the Final EIS are still valid under the Refined LPA. Therefore, regional travel demand or vehicle miles traveled (VMT) on highways would be no different than under the LPA, and subsequently, project conformance with the Virginia State Implementation Plan (SIP) to meet and attain the National Ambient Air Quality Standards (NAAQS) would not change from what was reported in the Final EIS.

3(a) Agency Jurisdiction. DEQ is charged with carrying out mandates of the state law and the *State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution*, as well as Virginia's obligations under the federal Clean Air Act as amended in 1990. The objective is to protect and enhance public health and quality of life through control and mitigation of air pollution. The division ensures the safety and quality of air in Virginia by monitoring and analyzing air quality data, regulating sources of air pollution, and working with local, state and federal agencies to plan and implement strategies to protect Virginia's air quality. The appropriate DEQ regional office is directly responsible for the issuance of necessary permits to construct and operate all stationary sources in the region as well as monitoring emissions from these sources for compliance.

3(b) Agency Comments. DEQ's Northern Regional Office (DEQ-NRO) reminds the project managers that construction phases of the project are subject to permitting requirements associated with fuel-burning (or other air pollution-emitting) equipment and to rules governing fugitive dust and fugitive emissions. DEQ-NRO has permitting authority for the region including the project area.

3(c) Recommendation. The responsible proponents should take all reasonable precautions to limit emissions of volatile organic compounds (VOCs) and nitrogen oxides (NO_x) principally by controlling or limiting the burning of fossil fuels because the project site is located in a designated ozone nonattainment area and emission control area for NO_x and VOCs which are precursors to ozone (O_3) pollution.

3(d) Requirements.

(i) Asphalt Paving

In accordance with 9 VAC 5-40-5490, there are limitations on the use of "cut-back" (liquefied asphalt cement, blended with petroleum solvents) that may apply to paving activities associated with the project. The asphalt must be "emulsified" (predominantly cement and water with a small amount of emulsifying agent) except when specified

circumstances apply. Moreover, there are time-of-year restrictions on its use during the months of April through October in VOC emission control areas.

(ii) Fugitive Dust

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

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

(iii) Open Burning

If project activities include the open burning or use of special incineration devices for the disposal of land clearing debris, this activity must meet the requirements of 9 VAC 5-130-10 through 9 VAC 5-130-60 and 9 VAC 5-130-100of the *Regulations* for open burning, and it may require a permit. The *Regulations* provide for, but do not require, the local adoption of a model ordinance concerning open burning. The project proponent should contact Fairfax County officials to determine what local requirements, if any, exist.

(iv) Fuel Burning Equipment

The installation of fuel burning equipment (e.g. boilers and generators), may require permitting from DEQ prior to beginning construction of the facility (9 VAC 5-80, Article 6, Permits for New and Modified Sources). The project proponent should contact DEQ-NRO for guidance on whether this provision applies.

4. Waste Management. The EA (page 3-5) states that the seven hazardous materials sites identified in the Final EIS were not expected to affect the construction of the LPA. An additional soil and groundwater contamination investigation was conducted for Phase 2. The conclusion of the investigation was the same as what was disclosed in the Final EIS: the low levels of soil and groundwater contamination do not require further immediate action and are not likely to affect construction activities. However, the investigation did uncover concentrations of barium in groundwater that appeared widespread in the samples collected. Although no definitive source area was identified, the concentration may be a result of a previous coal ash disposal area within the airport property or it could be from a naturally occurring source. The investigation recommended future considerations be given in managing groundwater during any construction activity, such as dewatering. The Airports Authority will prepare a mitigation

and management plan to address hazardous and contaminated materials uncovered during construction, if any.

4(a) Agency Jurisdiction. Solid and hazardous wastes in Virginia are regulated by DEQ, the Virginia Waste Management Board, and the U.S. Environmental Protection Agency. These agencies and entities administer programs created by the federal Resource Conservation and Recovery Act, the Comprehensive Environmental Response Compensation and Liability Act (commonly called Superfund), and the Virginia Waste Management Act. DEQ administers regulations established by the Waste Management Board, and reviews permit applications for completeness and conformance with facility standards and financial assurance requirements. All Virginia localities are required, under the Solid Waste Management Regulations, to identify the strategies they will follow on the management of their solid wastes, to include items such as facility siting, long-term (20-year) use, and alternative programs, such as materials recycling and composting.

4(b) Agency Comments. DEQ recommends that if any solid waste or hazardous waste is generated or encountered during construction of the project or its operation, the project manager and facility manager follow applicable federal, state, and local regulations for management and disposal of the waste. See "Regulatory and Coordination Needs," item 4, for citations of applicable law and regulation and sources of additional information.

5. Erosion and Sediment Control; Stormwater Management.

5(a) Agency Jurisdiction. The mission of the Department of Conservation and Recreation (DCR) is to conserve Virginia's natural and recreational resources. DCR supports a variety of environmental programs organized within seven divisions including the Division of Stormwater Management. DCR's Division of Stormwater Management (DCR-DSM) administers the Virginia Erosion and Sediment Control Law and Regulations and the Virginia Stormwater Management Law and Regulations.

5(b) Erosion and Sediment Control; Stormwater Management. MWAA, its partners, and their authorized agents conducting regulated land disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R), the Virginia Stormwater Management Law and Regulations including coverage under the general permit for stormwater discharge from construction activities, and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act, section 313 and Federal Consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, borrow areas, soil stockpiles, and related activities that result in the disturbance of greater than or equal to 2,500 square feet of land area (for areas in localities that enforce the Chesapeake Bay Protection Act) and greater than or equal to 10,000 square feet (for localities that do not have Chesapeake Bay protection requirements) are regulated by VESCL&R. Accordingly, MWAA must prepare and implement an erosion and sediment control (ESC) plan to ensure

compliance with state law and regulations. The ESC plan is submitted to the DCR Regional Office that serves the area where the project is located (see "Regulatory and Coordination Needs," item 6, below) for review for compliance. The applicant is ultimately responsible for achieving project compliance through oversight of on-site contractors, regular field inspection, prompt action against non-compliant sites, and other mechanisms consistent with agency policy. [Reference: VESCL, Virginia Code §10.1-567].

5(c) General Permit for Discharges of Stormwater from Construction Activities. The operator or owner of construction activities involving land-disturbing activities equal to or greater than one acre is required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities, and to develop a project-specific stormwater pollution prevention plan (SWPPP). Construction activities requiring registration also include the disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan of development will ultimately disturb an area equal to or greater than one acre. The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit; it must address water quality and quantity in accordance with the *Virginia Stormwater Management Program (VSMP) Permit Regulations.* General information and registration forms for the General Permit are available on DCR's website at *www.dcr.virginia.gov/stormwater_management/vsmp.shtml.* [Reference: Virginia Stormwater Management Law, Virginia Code sections10.1-603.1 *et seq.*; *VSMP Permit Regulations,* 4 VAC 50 *et seq.*]

5(d) General Permit for Discharges of Stormwater from Construction Activities in Chesapeake Bay Preservation Areas. The operator or owner of construction activities involving land-disturbing activities equal to or greater than 2,500 square feet in areas designated as subject to the *Chesapeake Bay Preservation Area Designation and Management Regulations* (9 VAC 10-20-10 *et seq.*) adopted pursuant to the Chesapeake Bay Preservation Act (Virginia Code sections 10.1-2100 *et seq.*) are required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project-specific stormwater pollution prevention plan (SWPPP). Construction activities requiring registration also include the disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan of development will ultimately disturb an area equal to or greater than one acre. The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit; it must address water quality and quantity in accordance with the *Virginia Stormwater Management Program (VSMP) Permit Regulations.* General information and registration forms for the General Permit are available on DCR's website at *www.dcr.virginia.gov/stormwater_management/vsmp.shtml.* [Reference: Virginia Stormwater Management Law, Virginia Code sections 10.1-603.1 *et seq.*; *VSMP Permit Regulations,* 4 VAC 50 *et seq.*]

6. Chesapeake Bay Preservation Areas. The EA (page 3-38) states that the Refined LPA would encroach into 0.47 acre of the Resource Protection Area (RPA) based on

updated RPA boundaries. Of this amount, 0.44 acre is associated with the relocation of the Route 28 Station north side facility. The remaining 0.03 acre is associated with an outfall from SWM #4A. The Chesapeake Bay Preservation Ordinance (CBPO) provides an exemption for railroads and their appurtenant structures, but not for stations and associated parking facilities. The Airports Authority will request a formal exemption, which will include a water quality impact assessment in order to meet CBPO requirements. These same requirements applied to the LPA.

6(a) Agency Jurisdiction. The Department of Conservation and Recreation's Division of Stormwater Management –Local Implementation administers the coastal lands management enforceable policy of the VCP which is governed by the *Chesapeake Bay Preservation Act* (*Bay Act*) (*Virginia Code* §10.1-2100-10.1-2114) and *Chesapeake Bay Preservation Area Designation and Management Regulations* (*Regulations*) (9 VAC 10-20 *et seq.*).

6(b) Requirements and Exemptions. In Fairfax County, the areas protected by the *Chesapeake Bay Preservation Act*, as locally implemented, require conformance with performance criteria. These areas include Resource Protection Areas (RPAs) and Resource Management Areas (RMAs) as designated by the local government. RPAs include tidal wetlands, certain non-tidal wetlands, and tidal shores. RPAs also include a 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow. All areas of the County not included in the RPA are designated as RMAs.

Public rail lines and their appurtenant structures are conditionally exempt from the *Chesapeake Bay Preservation Area Designation and Management Regulations*, provided they are constructed in accordance with: (i) regulations promulgated pursuant to the Erosion and Sediment Control Law (Virginia Code sections 10.1-560 *et seq.*) and the Stormwater Management Act (Virginia Code sections 10.1-603.1 *et seq.*), (ii) an erosion and sediment control plan and a stormwater management plan approved by the Virginia Department of Conservation and Recreation, or (iii) local water quality protection criteria at least as stringent as the above requirements.

While an exemption from the *Regulations* applies to the rail line and appurtenant structures, it does not apply to stations and associated parking facilities.

The Phase 2 project will be consistent with the Act and the *Regulations* if it adheres to these requirements.

7. Natural Heritage Resources. The Final EIS reported a no adverse effect determination on rare, threatened and endangered Species, in accordance with Section 7 of the Endangered Species Act. Section 3.8 discloses updated coordination with resource agencies on species of that may be affected by the Project.

7(a) Agency Jurisdiction; Definition. The mission of the Department of Conservation and Recreation's Division of Natural Heritage (DCR-DNH) is to conserve Virginia's

biodiversity through inventory, protection, and stewardship. The Virginia Natural Area Preserves Act, Virginia Code sections 10.1-209 through 10.1-217, enacted in 1989, codified DCR's powers and duties related to statewide biological inventory: maintaining a statewide database for conservation planning and project review, land protection for the conservation of biodiversity, and the protection and ecological management of natural heritage resources.

"Natural heritage resources" are defined as the habitats of rare, threatened and endangered species, significant natural communities, geologic sites, and other natural features.

7(b) Natural Area Preserves. According to DCR, there are no state Natural Area Preserves in the vicinity of the project.

7(c) Findings. DCR has searched its Biotics Data System for occurrences of natural heritage resources from the areas indicated on the maps in the EA. Biotics documents the presence of natural heritage resources in two areas defined as Stream Conservation Units. Stream Conservation Units are defined in item 7(c)(i), below; the resources and related information are discussed in item 7(d), below.

- In the Broad Run-Route 607 Stream Conservation Unit (on the Herndon U.S. Geological Survey quadrangle map), the natural heritage resource of concern is the yellow lampmussel, *lampsilis cariosa*, G3G4/S2/NL/NL.

- In the Sugarland Run Stream Conservation Unit (on the Vienna U.S. Geological Survey quadrangle map), the natural heritage resource of concern is the wood turtle, *glyptemys insculpta*, G4/S2/NL/LT. Sugarland Run, which is downstream of the project area, has been designated by the Department of Game and Inland Fisheries as a "Threatened and Endangered Species Water," with which the wood turtle is associated (see item 7(d)(ii), below).

7(c)(ii) Stream Conservation Units. Stream Conservation Units (SCUs) identify stream reaches that contain aquatic natural heritage resources, including 2 miles upstream and 1 mile downstream of documented occurrences, and all tributaries within this reach. Stream Conservation Units are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain. Both the Broad Run – Route 607 SCU and the Sugarland Run SCU have been given the biodiversity ranking of B5, which represents a site of general biodiversity significance.

7(d) Species of Concern; Habitat. As indicated above, DCR indicates that the yellow lampmussel and the wood turtle are species of concern.

7(d)(i) Yellow Lampmussel. The yellow lampmussel averages about 70 mm in length but can reach a length of 130 mm (Johnson, 1970). The yellow lampmussel is found in larger streams and rivers where good currents exist over a sand and gravel substrate and in small creeks and ponds. This species is known to occur in the Potomac, York,

and Chowan river basins (TNC, 1996). The species is currently classified as a special concern species by the Virginia Department of Game and Inland Fisheries (DGIF); however, this designation has no official legal status.

Considered good indicators of the health of aquatic ecosystems, freshwater mussels are dependent on good water quality, good physical habitat conditions, and an environment that will support populations of host fish species (Williams et al., 1993).

Because mussels are sedentary organisms, they are sensitive to water quality degradation related to increased sedimentation and pollution. They are also sensitive to habitat destruction through dam construction, channelization, and dredging, and the invasion of exotic mollusk species.

7(d)(ii) Wood Turtle. The Wood turtle ranges from southeastern Canada to the Great Lakes states and New England. In Virginia, it is known from northern counties within the Potomac River drainage (NatureServe, 2009). The Wood turtle inhabits areas with clear streams with adjacent forested floodplains and nearby fields, wet meadows, and farmlands (Buhlmann et al., 2008; Mitchell, 1994). Since this species overwinters on the bottoms of creeks and streams, a primary habitat requirement is the presence of water (Mitchell, 1994).

Threats to the wood turtle include habitat fragmentation, urbanization, and automobile or farm machinery mortality (Buhlmann et al., 2008). The Wood turtle is currently classified as threatened by the Department of Game and Inland Fisheries.

7(e) Plant and Insect Species. The *Endangered Plant and Insect Species Act* of 1979, Chapter 39 §3.1-1020 through 1030 of the *Code of Virginia*, as amended, authorizes the Virginia Department of Agriculture and Consumer Services (VDACS) to conserve, protect, and manage endangered and threatened species of plants and insects. The VDACS Virginia Endangered Plant and Insect Species Program personnel cooperates with the USFWS, DCR-DNH and other agencies and organizations on the recovery, protection or conservation of listed threatened or endangered species and designated plant and insect species that are rare throughout their worldwide ranges. In those instances where recovery plans, developed by USFWS, are available, adherence to the order and tasks outlined in the plans are followed to the extent possible.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services and the Virginia Department of Conservation and Recreation DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The proposed project will not affect any documented state-listed plants or insects.

7(f) Natural Heritage Recommendations. DCR-DNH offers the following recommendations:

- Coordinate with the Department of Game and Inland Fisheries to ensure compliance with the Virginia Endangered Species Act (Virginia Code sections 29.1-563 through 29.1-570) due to the status of the Wood turtle;
- Implement and strictly adhere to applicable state and local erosion and sediment control and stormwater management laws and regulations to minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities; and
- Contact DCR-DNH, Rene Hypes at (804) 371-2708 for an update on natural heritage information if a significant amount of time passes before the project is initiated since new and updated information is continually added to the Biotics Data System.

8. Wildlife Resources and Protected Species.

8(a) Agency Jurisdiction. The Department of Game and Inland Fisheries (DGIF), as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state or federally listed endangered or threatened species, but excluding listed insects (*Virginia Code* Title 29.1). The DGIF is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S.C. sections 661 *et seq.*), and provides environmental analysis of projects or permit applications coordinated through DEQ and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce, or compensate for those impacts.

8(b) Agency Comments. DGIF did not respond to DEQ's request for comments on this proposal.

8(c) Additional Information.

The Virginia Department of Game and Inland Fisheries (VDGIF) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from http://vafwis.org/fwis/.

9. Dulles Corridor and Other Transportation. According to the EA (page 3-7), the traffic impact analysis disclosed in the Final EIS is still valid because updates to regional travel demand projections by the Metropolitan Washington Council of Governments (MWCOG) for 2030 are consistent with the travel demand projections used by the Final EIS, and because the Refined LPA would not result in an increase in traffic generation at any of the stations. Supplemental traffic impact analyses were conducted due to design modifications of the stations and the results of the analyses are presented in Section 3.10. In addition, the Refined LPA may affect ground transportation and parking at Dulles Airport during both construction and operation of the system because it would introduce an aerial structure along roadways and land used by airport tenants and their customers. Section 3.10 also presents an assessment of potential impacts to operations of airport tenants due to the introduction of an aerial structure at Dulles Airport.

9(a) Agency Jurisdiction. The Virginia Department of Transportation (VDOT) is responsible for planning, financing, construction, and maintenance of most of the roads and highways in Virginia. VDOT works with federal authorities and with local and regional governments to ensure the smooth flow of vehicular traffic throughout the Commonwealth.

9(b) Agency Comments. VDOT commented on transportation planning and on land development, as affected by implementation of the refined Locally Preferred Alternative for Phase 2 of the Dulles Corridor Metrorail Project, as follows. See attached VDOT comments for additional detail. Questions may be directed to VDOT; see "Regulatory and Coordination Needs, item 7, below.

9(b)(i) Transportation Planning. According to VDOT, the EA relied on the earlier traffic impact analysis in the Final Environmental Impact Statement (Final EIS), so it is impossible to detail new impacts on existing or proposed roads resulting from the refined Locally Preferred Alternative. The refined LPA does indicate that the 9 intersections with low levels of service (LOS F) continue to operate at that level, but no new intersections were added to that category.

According to VDOT, previous comments by Loudoun County regarding (1) keeping the Dulles North Transit Center independent and (2) not having an access road between the Center and the Metro garage at the Route 606 station have been addressed in the refined LPA.

9(b)(ii) Land Development. VDOT raised five questions relative to the original traffic analysis and potential land development. Please see the attached VDOT comments.

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

10(a) Recommendations. We have several pollution prevention recommendations that may be helpful in constructing or operating this facility:

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the responsible proponent agency is committed to minimizing its environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and it recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program.

- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitment to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.

DEQ's Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques and EMS. For more information, contact DEQ's Office of Pollution Prevention, Sharon Baxter at (804) 698-4344.

11. Pesticides and Herbicides. Should construction or maintenance of the facility require the use of pesticides or herbicides for landscape maintenance, these chemicals should be in accordance with the principles of integrated pest management. The least toxic pesticides that are effective in controlling the target species should be used.

Contact the Department of Agriculture and Consumer Services at (804) 786-3501 for more information.

REGULATORY AND COORDINATION NEEDS

1. Historic Structures and Archaeological Resources. MWAA and its partner agencies should continue working with the Department of Historic Resources pursuant to Section 106 of the National Historic Preservation Act of 1966. The contact person is Marc Holma (e-mail marc.holma@dhr.virginia.gov).

2. Wetlands Permitting. As indicated above ("Environmental Impacts and Mitigation," item 2(b)), a change in the size and scope of the project may require a modification of the Virginia Water Protection individual permit (number 11-093). Questions in this regard may be addressed to DEQ's Northern Regional Office (Bryant Thomas, telephone (703) 583-3843).

3. Air Pollution Control.

3(a) Applicable Rules. The *State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution* include provisions that govern activities and effects, as follows:

- 9 VAC 5-40-5490 *et seq.* govern asphalt paving operations;
- 9 VAC 5-130 *et seq.* govern open burning activities; and
- 9 VAC 5-50-60 through 5-50-120 govern fugitive dust emissions.

Questions on these regulatory provisions, and on whether air pollution control permitting is required for fuel-burning equipment, may be addressed to DEQ's Northern Regional Office (Terry Darton, telephone (703) 583-3845).

4. Waste Management.

4(a) Applicable Rules. Some of the laws and regulations which may apply to this project follow (see "Environmental Impacts and Mitigation," item 4, above):

State:

- Virginia Waste Management Act, Virginia Code sections 10.-1400 *et seq.*;
- *Virginia Hazardous Waste Management Regulations*, 9 VAC 20-60;
- *Virginia Solid Waste Management Regulations*, 9 VAC 20-80;
- *Virginia Regulations for the Transportation of Hazardous Materials*, 9 VAC 20-110.

Federal:

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

4(b) Coordination. Questions on the locations of waste management facilities in the vicinity of the project may be directed to DEQ's Northern Regional Office (Richard Doucette, telephone (703) 583-3813). Other questions on waste management may be directed to DEQ's Division of Land Protection and Revitalization (Steve Coe, telephone (804) 698-4029).

5. Natural Heritage Resources. Updated information on natural heritage resources may be obtained by contacting the Department of Conservation and Recreation's Division of Natural Heritage (Rene' Hypes, telephone (804) 371-2708).

To ensure compliance with the Virginia Endangered Species Act, the Department of Conservation and Recreation recommends that the responsible project proponent coordinate with the Department of Game and Inland Fisheries (begin with Amy Ewing, telephone (804) 367-2211).

6(a) Erosion and Sediment Control; Stormwater Management. The project must comply with *Virginia Erosion and Sediment Control Law* (Virginia Code 10.1-567) and *Regulations* (4 VAC 50-30-30 *et seq.*) and *Stormwater Management Law* (Virginia Code 10.1-603.5) and *Regulations* (4 VAC 3-20-210 *et seq.*). Questions on erosion and sediment control and stormwater management may be directed to the Department of Conservation and Recreation's Warrenton Regional Office (telephone (540) 347-6420).

6(b) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities. For projects involving land-disturbing activities of equal to or greater than one acre (2,500 square feet or more in a Chesapeake Bay Preservation Area), the responsible proponent is required to apply for registration coverage under the Virginia Stormwater Management Program General Permit for Discharges of Stormwater from Construction Activities. Specific questions regarding the Stormwater Management Program requirements should be directed to Holly Sepety, DCR, at (804) 225-2613.

7. Road Transportation. Questions regarding VDOT comments may be directed to VDOT's Northern Regional Office (Randy Hodgson, telephone (703) 259-2753).

Thank you for the opportunity to comment on this EA. The detailed comments of reviewing agencies are attached for your review. If you have questions, please feel free to contact me (telephone (804) 698-4325 or e-mail ellie.irons@deq.virginia.gov) or Charles Ellis of this Office (telephone (804) 698-4195 or e-mail charles.ellis@deq.virginia.gov).

Sincerely,

Ellie L. Irons, Program Manager
Environmental Impact Review

enclosures

ec: Roberta Rhur, DCR
Amy M. Ewing, DGIF
Dell Cheatham, DEQ-NRO
Tony Watkinson, VMRC
Fred R. Hodgson, VDOT
Alfred C. Ray, VDOT
Marc E. Holma, DHR
Pamela Nee, Fairfax County
Barbara Donellen, Arlington County
Tim Hemstreet, Loudoun County
Fred Shelden, Fairfax County
Amy Vosper, NVRC

From: Cheatham, John (DEQ)
Sent: Wednesday, May 23, 2012 1:36 PM
To: Ellis, Charles (DEQ)
Subject: EA 12-100F: Dulles Corridor Metrorail Project, Phase 2
Attachments: 12-100F Env Review Form.docx

NRO comments regarding the Dulles Corridor Metrorail Project, Phase 2, "Preliminary Engineering Design Requirements" are as follows:

Virginia Water Protection Permit (VWPP) Program - The information provided indicates that the project will impact additional surface water beyond those proposed in the previous EA; however the impacts are consistent with those permitted under VWPP Individual Permit No. 11-0193, issued on June 10, 2011. Please note, should the size and scope of the project change, a modification of the individual permit may be required. DEQ VWP staff recommends avoidance and minimization of additional surface water impacts to the maximum extent practicable.

Division of Land Protection and Revitalization - If any solid or hazardous waste is generated/encountered during construction and /or operation of the facility, the project manager and facility manager shall follow applicable federal, state, and county regulations for their disposal.

Air Compliance/Permitting - The project manager is reminded that during the construction phases that occur with this project; the project is subject to the Fugitive Dust/Fugitive Emissions Rule 9 VAC 5-50-60 through 9 VAC 5-50-120. In addition, should the project install fuel burning equipment (Boilers, Generators, Compressors, etc...), or any other air pollution emitting equipment, the project may be subject to 9 VAC 5-80, Article 6, Permits for New and Modified sources and as such the project manager should contact the Air Permit Manager DEQ-NRO prior to installation or construction, and operation, of fuel burning or other air pollution emitting equipment for a permitting determination.

Dell Cheatham
VWP Permit Writer - Virginia Department of Environmental Quality
Northern Regional Office - 13901 Crown Court, Woodbridge, VA 22193
703-583-3805

From: Ellis, Charles (DEQ)
Sent: Monday, May 21, 2012 2:04 PM
To: Ewing, Amy (DGIF); Rhur, Robbie (DCR); Cheatham, John (DEQ); Ray, Alfred C. (VDOT); Watkinson, Tony (MRC); Holma, Marc (DHR); [redacted]
Cc: Fulcher, Valerie (DEQ)
Subject: Review of Environmental Assessment: Dulles Corridor Metrorail Project, Phase 2, "Preliminary Engineering Design Requirements" (DEQ-12-100F)

Everybody – Please review the Environmental Assessment listed above. The document indicates the names and addresses of recipients, including federal, state, and local entities, in Appendix A. In some cases, it was addressed to agency heads (DCR, DGIF, MRC, and DEQ-NRO as well as Counties). Our review request form is attached.

In view of the need for coordination and approvals, please comment to DEQ's Office of Environmental Impact Review by June 12. Thanks very much.

Charlie Ellis
DEQ-OEIR
May 21, 2012

Douglas W. Domenech
Secretary of Natural Resources

David A. Johnson
Director

COMMONWEALTH of VIRGINIA

DEPARTMENT OF CONSERVATION AND RECREATION

203 Governor Street
Richmond, Virginia 23219-2010
(804) 786-1712

MEMORANDUM

DATE: June 11, 2012

TO: John Fisher, DEQ

FROM: Roberta Rhur, Environmental Impact Review Coordinator

SUBJECT: DEQ 12-100F: Dulles Corridor Metrorail Project – Phase II

Division of Natural Heritage

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

Sterling Quad:

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

Herndon Quad:

According to the information currently in our files, the project site is within the Broad Run – Route 607 Stream Conservation Unit. Stream Conservation Units (SCUs) identify stream reaches that contain aquatic natural heritage resources, including 2 miles upstream and 1 mile downstream of documented occurrences, and all tributaries within this reach. Stream Conservation Units are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain. The Broad Run – Route 607 SCU has been given a biodiversity ranking of B5, which represents a site of general biodiversity significance. The natural heritage resource associated with this site is :

Lampsilis cariosa	Yellow lampmussel	G3G4/S2/NL/NL

The yellow lampmussel averages about 70 mm in length but can reach a length of 130 mm (Johnson, 1970). The yellow lampmussel is found in larger streams and rivers where good currents exist over a sand and gravel substrate and in small creeks and ponds. This species is known to occur in the Potomac, York, and Chowan river basins (TNC, 1996). Please note that this species is currently classified as a

special concern species by the Virginia Department of Game and Inland Fisheries (VDGIF); however, this designation has no official legal status.

Considered good indicators of the health of aquatic ecosystems, freshwater mussels are dependent on good water quality, good physical habitat conditions, and an environment that will support populations of host fish species (Williams et al., 1993). Because mussels are sedentary organisms, they are sensitive to water quality degradation related to increased sedimentation and pollution. They are also sensitive to habitat destruction through dam construction, channelization, and dredging, and the invasion of exotic mollusk species.

Vienna Quad:

According to the information currently in our files, the Sugarland Run Stream Conservation Unit (SCU) has been documented downstream of the project site. Stream Conservation Units (SCUs) identify stream reaches that contain aquatic natural heritage resources, including 2 miles upstream and 1 mile downstream of documented occurrences, and all tributaries within this reach. Stream Conservation Units are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain. The Sugarland Run SCU has been given a biodiversity ranking of B5, which represents a site of high significance, which indicates it is of General Biodiversity significance. The natural heritage resource associated with this site is:

Glyptemys insculpta	Wood Turtle	G4/S2/NL/LT

The Wood turtle ranges from southeastern Canada, south to the Great Lake states and New England. In Virginia, it is know from northern counties within the Potomac River drainage (NatureServe, 2009). The Wood turtle inhabits areas with clear streams with adjacent forested floodplains and nearby fields, wet meadows, and farmlands (Buhlmann et al., 2008; Mitchell, 1994). Since this species overwinters on the bottoms of creeks and streams, a primary habitat requirement is the presence of water (Mitchell, 1994).

Threats to the wood turtle include habitat fragmentation, urbanization, and automobile or farm machinery mortality (Buhlmann et al., 2008). Please note that the Wood turtle is currently classified as threatened by the Virginia Department of Game and Inland Fisheries (VDGIF).

To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations. Due to the legal status of the Wood turtle, DCR recommends coordination with Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

Sugarland Run, which has been designated by the Virginia Department of Game and Inland Fisheries (VDGIF) as a "Threatened and Endangered Species Water," is downstream of the project area. The species associated with this T & E Water is the Wood turtle (*Glyptemys insculpta*, G4/S2/NL/LT).

To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations. Due to the legal status of the Wood turtle, DCR recommends coordination with Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Virginia Department of Conservation and Recreation (DCR), DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

The Virginia Department of Game and Inland Fisheries (VDGIF) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from http://vafwis.org/fwis/ or contact Gladys Cason (804-367-0909 or Gladys.Cason@dgif.virginia.gov).

Division of Stormwater Management

Chesapeake Bay Local Assistance:
In Fairfax County, the areas protected by the *Chesapeake Bay Preservation Act*, as locally implemented, require conformance with performance criteria. These areas include Resource Protection Areas (RPAs) and Resource Management Areas (RMAs) as designated by the local government. RPAs include tidal wetlands, certain non-tidal wetlands and tidal shores. RPAs also include a 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow. All areas of the County not included in the RPA are designated as RMAs.

Public rail lines and their appurtenant structures are conditionally exempt from the *Chesapeake Bay Preservation Area Designation and Management Regulations* (Regulations) provided they are constructed in accordance with: (i) regulations promulgated pursuant to the Erosion and Sediment Control Law (§10.1-560 et seq. of the Code of Virginia) and the Stormwater Management Act (§10.1-603. 1 et seq of the Code of Virginia), (ii) an erosion and sediment control plan and a stormwater management plan approved by the Virginia Department of Conservation and Recreation, or (iii) local water quality protection criteria at least as stringent as the above requirements.

An exemption from the Regulations would apply to the public rail line component of the project as well as to appurtenant structures but not to stations and associated parking facilities.

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

Stormwater Management:
The applicant and their authorized agents conducting regulated land disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R), Virginia Stormwater Management Law and Regulations including coverage under the general permit for stormwater discharge from construction activities, and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act-Section 313, Federal Consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, borrow areas, soil stockpiles, and related land-disturbance activities that result in the land-disturbance of equal to or greater than 2,500 for areas in localities that

enforce the Chesapeake Bay Protection Act and equal to or greater than 10,000 square feet for localities that do not have Chesapeake Bay protection requirements would be regulated by VESCL&R. Accordingly, the applicant must prepare and implement erosion and sediment control (ESC) plan to ensure compliance with state law and regulations. The ESC plan is submitted to the DCR Regional Office that serves the area where the project is located for review for compliance. The applicant is ultimately responsible for achieving project compliance through oversight of on site contractors, regular field inspection, prompt action against non-compliant sites, and other mechanisms consistent with agency policy. [Reference: VESCL §10.1-567;].

General Permit for Discharges of Stormwater from Construction Activities:
The operator or owner of construction activities involving land disturbing activities equal to or greater than one acre are required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). Construction activities requiring registration also includes the land-disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan of development will ultimately disturb equal to or greater than one acre. The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Permit Regulations. General information and registration forms for the General Permit are available on DCR's website at http://www.dcr.virginia.gov/soil_and_water/index.shtml
[Reference: Virginia Stormwater Management Law Act §10.1-603.1 et seq.; VSMP Permit Regulations §4VAC-50 et seq.]

General Permit for Discharges of Stormwater from Construction Activities in CBPA:
The operator or owner of construction activities involving land disturbing activities equal to or greater than 2,500 square feet in areas designated as subject to the Chesapeake Bay Preservation Area Designation and Management Regulations adopted pursuant to the Chesapeake Bay Preservation Act are required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Permit Regulations. General information and registration forms for the General Permit are available on DCR's website at http://www.dcr.virginia.gov/soil_and_water/index.shtml
[Reference: Virginia Stormwater Management Law Act §10.1-603.1 et seq.; VSMP Permit Regulations §4VAC-50 et seq.]

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

Cc: Amy Ewing, VDGIF

Literature Cited

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From: Holma, Marc (DHR)
Sent: Monday, May 21, 2012 2:08 PM
To: Ellis, Charles (DEQ)
Cc: Kirchen, Roger (DHR)
Subject: RE: Review of Environmental Assessment: Dulles Corridor Metrorail Project, Phase 2, "Preliminary Engineering Design Requirements" (DEQ-12-100F)

Charlie,

We have been working with MWAA on this project since 2000. Currently we are in the process of reviewing draft MOAs. Just tell them to continue to consult with DHR pursuant to Section 106. Thanks.

Marc

From: Ellis, Charles (DEQ)
Sent: Monday, May 21, 2012 2:04 PM
To: Ewing, Amy (DGIF); Rhur, Robbie (DCR); Cheatham, John (DEQ); Ray, Alfred C. (VDOT); Watkinson, Tony (MRC); Holma, Marc (DHR); [redacted]
Cc: Fulcher, Valerie (DEQ)
Subject: Review of Environmental Assessment: Dulles Corridor Metrorail Project, Phase 2, "Preliminary Engineering Design Requirements" (DEQ-12-100F)

Everybody – Please review the Environmental Assessment listed above. The document indicates the names and addresses of recipients, including federal, state, and local entities, in Appendix A. In some cases, it was addressed to agency heads (DCR, DGIF, MRC, and DEQ-NRO as well as Counties). Our review request form is attached.

In view of the need for coordination and approvals, please comment to DEQ's Office of Environmental Impact Review by June 12. Thanks very much.

Charlie Ellis
DEQ-OEIR
May 21, 2012

From: Hodgson, Fred R (VDOT)
Sent: Tuesday, June 12, 2012 1:38 PM
To: Ellis, Charles (DEQ)
Cc: Ray, Alfred C. (VDOT); Cromwell, James R. (VDOT); Srikanth, Kanathur N. (VDOT)
Subject: RE: Comments on Dulles Corridor Metrorail Project, Phase 2, Revised.

Mr. Ellis: As a follow-up to my e-mail below, I have just been contacted by **VDOT's Dulles Corridor Metrorail Coordinator** who indicated that he will need several more days before he can respond. I will forward you his comments as soon as I receive them. Thanks, Randy Hodgson

From: Hodgson, Fred R (VDOT)
Sent: Tuesday, June 12, 2012 11:01 AM
To: Ellis, Charles (DEQ)
Cc: Ray, Alfred C. (VDOT); Cromwell, James R. (VDOT); Srikanth, Kanathur N. (VDOT)
Subject: Comments on Dulles Corridor Metrorail Project, Phase 2, Revised.

Mr. Ellis: I have referred this request to the appropriate NoVa District Sections for their comments and review. The results of this solicitation are arrayed below.

Transportation Planning

First, it is noted that this document for review is a "refinement' to the original Locally Preferred Alternative (LPA) approved earlier and now comes before us as the Refined Locally Preferred Alternative because of several changes to the original plan. Foremost among them was building the Dulles Airport Station above ground rather than below ground as well as a small realignment of the Rte 28 Station. Because of these limited changes, the document states" that the potential impacts to the following types of categories of environmental resources as disclosed in the Final EIS will not change as a result of the implementation of the Refined LPA." The report goes on to state that " the traffic impact analysis disclosed in the Final EIS is still valid because updates to regional travel demand projections by the Metropolitan Washington Council of Governments (MWCOG) for 2030 are consistent with the travel demand projections used by the Final EIS, and because the Refined LPA would not result in an increase in traffic generation at any of the stations." Based upon this finding, one must rely on the earlier LPA and the data and findings that were made when that document was approved. Because no new Traffic Analysis was provided with this refined LPA, it is impossible to detail any new impacts on the existing and proposed transportation facilities surrounding Phase 2 of the Dulles Rail project. The Refined LPA does indicate that of the 27 Intersections involved with the project, the 9 intersections that were LOS F continued to operate at that level but no additional intersections were added to that category.
TP staff reviewed the station layouts and facilities and the previous comments by Loudoun OTS regarding keeping the Dulles North Transit Center (DNTC) lot independent and not having an access road between DNTC and metro garage at Route 606 station and these comments have been addressed in the Refined LPA.

Land Development

After reviewing the Refined LPA, the Land Development Section highlighted a number of concerns it had because of the time that has elapsed between when the LPA was first performed and when the Refined LPA was prepared. These questions are outlined below.

1. Did the original traffic analysis include the massive increase in zoning for Tysons Corner?
2. Did the original traffic analysis include the massive development at the CIT site in Fairfax County?
3. Did the original traffic analysis include the massive development at World Center in Loudoun County?
4. Has Fairfax County indicated that they would approve massive zoning increases in the Reston Area when Metro is constructed? What did the traffic analysis show?
5. Did the traffic analysis show that Route 28 would fail if all these rezonings were approved even if it were widened to 10 lanes?

Environmental Section

No comments were submitted.

Traffic Engineering

No comments were submitted.

VDOT's Dulles Corridor Metrorail Coordinator

No comments were submitted.

The Northern Virginia District of VDOT appreciates the opportunity to review and comment on the Dulles Corridor Metrorail Project, Phase 2, Revised.

Randy Hodgson AICP | Regional Transportation Planner |
Virginia Department of Transportation | 4975 Alliance Drive, Fairfax, VA 22030 |
Phone 703-259-2753 | [redacted]

Re: Silver Line Ridership Projections, Phases I and II

[redacted]

Sent: Wednesday, June 20, 2012 11:12 AM

To: eacomments

Cc: [redacted]

Many thanks for your email and the link to the 2004 EIS, which answers all of my questions. I plan to read the full EIS when time permits and have now bookmarked this page.

Good luck in getting Loudoun County to support funding for the Phase 2 Silver Line! Much needed! I think it would be an easier sell if it went all the way to the Leesburg bypass road. Then the County Supervisors would be more likely to use the line and see the benefits, and Leesburg Pike and the Dulles Greenway would have far less traffic! Are they afraid they would lose money on the toll road?

Michael Burrill

From: "eacomments" <eacomments@DullesMetro.com>
To: [redacted]
Sent: Wednesday, June 20, 2012 8:38:54 AM
Subject: RE: Silver Line Ridership Projections, Phases I and II

Mr. Burrell - the current Environmental Assessment focuses only on design changes to Phase 2 since the Final Environmental Impact Statement. No new ridership projections were prepared. Additional information on the project's effects to the local roadway network are included in Chapter 6 of the 2004 Final EIS. The results for the "Full LPA" refer to the entire Project (Phase 1 and Phase 2 combined). A copy of that document is here: http://www.dullesmetro.com/community/impact_report.cfm

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From: [redacted]
Sent: Tuesday, June 19, 2012 4:54 PM
To: eacomments
Subject: Fwd: Silver Line Ridership Projections, Phases I and II

I have already received a prompt reply on Silver Line ridership projections from Ms. McAllister. Thanks so much!

She was unable to answer my question on anticipated reduction in highway congestion as a result of the new rail line, however. Usually the Environmental Assessments will seek to estimate those impacts. I have been so far unable to open the latest assessment to find out.

Michael Burrill

From: [redacted]
To: eacomments@dullesmetro.com

Sent: Tuesday, June 19, 2012 12:19:45 PM
Subject: Fwd: Silver Line Ridership Projections, Phases I and II

Can you please forward my email to Mr. Rohrer?

He may be able to help me get answers to the questions I posed to Ms. McAllister in the email I just sent this morning.

Thanks!

Michael Burrill AICP
Architect/Planner
Urban Visions

_____

From: [redacted]
To: "Marcia McAllister" <Marcia.McAllister@dullesmetro.com>
Cc: gbottoms@amconmag.com
Sent: Tuesday, June 19, 2012 12:14:27 PM
Subject: Silver Line Ridership Projections, Phases I and II

Dear Ms. McAllister,

I am a local architect and transportation planner now writing a book on urban transit systems and related transit-oriented development. I was unable to find the answers to two important questions about your Metro Silver Line on your website today:

How many weekday riders are projected to use the Phase I Silver Line to Reston (Wiehle Avenue) after the line opens?
How many weekday riders are projected to use the Phase II Silver Line between Reston and Loudoun Cty via Dulles Airport?

Your fact sheets and the latest Environmental Assessment would not open properly when I tried to access them from your website. I suggest you try to fix this before your June 25th deadline for comments!

The only projected ridership figures I could find are from an earlier 2002 Environmental Assessment (about 86,900), but most of that EA was focused on Tysons Corner and Phase I.

The big debate now is on funding for the extension to Dulles and Loudoun County. I think it would help convince Loudoun County Supervisors to support Phase II funding if you posted realistic projected ridership figures in a prominent location on your website. It would also help for everyone to learn how much traffic congestion on Leesburg Pike and the Dulles Greenway would likely be reduced after the line opens.

Michael Burrill
Architect/Planner AICP
Urban Visions

[redacted]

June 22, 2012

Mr. Karl A. Rohrer
Deputy Project Director, Phase 2
Dulles Corridor Metrorail Project
Metropolitan Washington Airports Authority
1593 Spring Hill Road, Suite 300
Vienna, Virginia 22182

RE: Phase 2 Preliminary Engineering Design Refinements Environmental Assessment comments; WMATA docket no. R12-01

Dear Mr. Rohrer:

Included herein are Fairfax County's comments on the Dulles Corridor Metrorail Project (DCMP) Phase 2 Preliminary Engineering Design Refinements Environmental Assessment (EA), Washington Metropolitan Area Transit Authority (WMATA) Docket No. R12-01.

PLANNING

Fairfax County supports the Phase 2 aerial alignment and above ground Metrorail station at Washington Dulles International Airport (Dulles Airport). The County requests it be noted in the EA that permanent names were selected for the Silver Line Metrorail station in Fairfax County, including Reston Town Center Station (Reston Parkway), Herndon Station (Herndon-Monroe), and Innovation Center Station (Route 28). The County is not requesting modification to existing plans, reports, diagrams, etc., but feels the permanent names should be reflected going forward.

At the Reston Parkway station (Reston Town Center Station), south side, further coordination between DCMP, Fairfax County, and WMATA staff to pursue redevelopment and stormwater management opportunities within one-quarter mile of the south side station pavilion. Such coordination should encourage mix-use development appropriate for a Metrorail station area. Additional comments on this topic are provided below.

At Figure 2-1, Phase 2 Alignment and Station Locations, the County recommends roadway and sub division elements, such as Broad Run, Saarinen Circle, Rudder Road, and Autopilot Drive, which are all mentioned in the narrative, be labeled for clarity purposes.

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

At Section 2.1.2, Stations, it is noted that the refined Locally Preferred Alternative (LPA) Route 28 station (Innovation Center Station), north side, includes a "longer" modified pedestrian bridge. Fairfax County recommends adding length information for easier comparison and to quantify the change from the existing plan at Route 28.

TRANSPORTATION

The previous inconsistency in the description of how traffic forecasts were developed has been corrected. This has resulted in changes in previous forecasts for some stations, with resulting changes in traffic analysis.

Several references exist to Virginia Department of Transportation (VDOT) design standards. VDOT has recently adopted revised (urban) standards for streets in the Tysons Corner area. Although these standards apply at this time only within Tysons, it may be possible for them to be adapted to other urban areas if the county wishes to pursue this with VDOT.

Reston Parkway (Reston Town Center Station)

General

- Forecasts do not recognize new north-south street connection across Dulles Toll Road.
- Station site plans do not appear to accommodate two features of the adopted County Transportation Plan:
    - new north-south street connection across Dulles Roll Road;
    - widening of Sunset Hills Road to six lanes.
- Correct the sentence conflict at page 3-46:

    The Edmund Halley Drive/Sunrise Valley Drive intersection is predicted to operate at LOS E during ~~both~~ the AM peak hour, but would operate at LOS C during the PM peak hour."

South Side

- Forecast traffic volumes have increased from previous analysis.
- Overall intersection Level of Service (LOS) at Edmund Halley Drive / Sunrise Valley Drive LOS = D (a.m.), C (p.m.) with extensions of LT & RT lanes to 425' (max. available).
- 95th % eastbound a.m. queue forecast = 1199' (approx. entire distance to U.S.G.S.). Distance between Edmund Halley Drive and eastern intersection of Mercator Drive = approx. 500'. Queues > approx. 500' will block this intersection.

North Side

- Forecast traffic volumes have (slightly) decreased from previous analysis.
- Overall intersection LOS at station entrance/Sunset Hills Road LOS = C (a.m.), D (p.m.).
- Required turning lanes shorter than previous analysis.

Herndon-Monroe (Herndon Station) – Alt. 2 Concept

General

- ALT. 2 continues as recommended concept. Major features of Alt. 2:
  - New, supplemental access to new garage, west of existing garage.
  - Need for additional right-of-way for additional lanes on Sunrise Valley Drive.
  - U-turns required at existing garage entrance for eastbound traffic into the new garage.
- The County requests additional information on changes to bus bays and bus circulation pattern in the south side facility from what was proposed in the Final Environmental Impact Statement (EIS), if any.

Traffic Analysis

- Forecast traffic volumes have increased for a.m., decreased for p.m. relative to previous analysis.
- Overall intersection LOS at garage entrance/Sunrise Valley Drive LOS = C (a.m.), C (p.m.).
- Several movements in/out of Roark Drive now forecast at LOS-F at various times a.m. /p.m.

Route 28 (Innovation Center Station)

General

The recommended concept is a significant revision of previous alternatives which appears to eliminate problems with those versions.

Traffic Analysis

- Forecast traffic volumes are almost identical to previous forecasts. These forecasts do not appear to incorporate traffic using the north-south street crossing of the Dulles Roll Road which is shown on the adopted county transportation plan.
- All intersections forecast to operate at LOS-C or better.

Mitigation Intersections

Reston Parkway and Sunrise Valley Drive

The analysis reports the following 3 conditions:

1. Existing 2010,
2. 2030 without mitigation, and;
3. 2030 with mitigation.

The intersection is projected to operate at extremely poor levels of service with extremely long queues and delays for some movements under conditions (2) and (3), but the operation in 2030 without the project is not clear.

From the description of how the future traffic forecast was derived, it is not clear whether full development of the site in the northwest quadrant of the intersection has been assumed. Full development of this site will add significantly more traffic to the intersection than reflected in the assumed background growth rates cited. In addition the background traffic growth rates on some approach legs are negative. This assumption will result in a decrease in traffic on these links, a condition that is counter-intuitive and which contradicts the statement on page 103 that "traffic is expected to increase in the design year 2030 due to the regional growth." Further review of these forecasts may be beneficial.

The recommended extension of the westbound Sunrise Valley Drive right turn lane to 350' will extend this lane beyond the existing intersection with Colts Neck Road and the opposite entrance to the commercial development. Additional right-of-way will probably need to be acquired to implement this extension.

The ± 650' eastbound 95th % queue will block the main entrance to the development in the northwest quadrant of the intersection.

There appear to be minor errors in Table 35 and the text on page 108:

- Table 35: the existing geometry for westbound Sunrise Valley Drive should be revised to indicate: One Left + One Left/Thru ± 1 Thru.
- Text on page 108 should be revised to state:

  The "Minimum Storage Bay Length" shown in the results tables is the recommended length to avoid having turning vehicles queue through the entire ~~left~~ turn lane and . . .

Fairfax County Parkway and Sunrise Valley Drive

The analysis reports the following 3 conditions:

1. Existing 2010
2. 2030 without mitigation
3. 2030 with mitigation

The intersection is projected to operate at extremely poor levels of service with extremely long queues and delays for some movements under conditions (2) and (3), but the operation in 2030 without the project is not clear.

Town Center Parkway Extension
Fairfax County's Transportation Plan identifies a proposed extension of Town Center Parkway such that it would cross the Dulles International Airport Access Highway (DIAAH) and Toll Road and ultimately connect with Sunrise Valley Drive. It is not clear that the refined plans for the Reston Parkway station (Reston Town Center Station) would afford an opportunity for such a crossing. Of particular note are the proposed stormwater management facilities and traction power substation; Fairfax County requests additional discussion on these project elements and the future Reston Parkway station itself to ensure a future roadway extension is not precluded based on DCMP Phase 2 project design, construction, or future Silver Line operation and maintenance. Currently Fairfax County is evaluating several tunnel alignments for this connection that would cross under both the DIAAH and the future DCMP (Silver Line).

HISTORIC PRESERVATION

Historic preservation comments are confined to the aerial guideway and above-ground station at Dulles Airport; Dulles Airport National Register-eligible Historic District.

Chapter 3, page 3-22. It appears from the EA that design for the Refined LPA above ground guideway takes into consideration the intrusive visual effects on the approach view that an above ground guideway will have and that the project design will seek to minimize the effect of the guideway on this view which contributes to the National Register-eligible Historic District. Fairfax County encourages a design that causes the least amount of impact on the views, including consideration of consolidation of the tracks into one aerial guideway structure. The Draft Memorandum of Agreement (MOA) (see Appendix D) stipulation 2, page 6, requires a design of aerial structures that minimize the interruptions to the views of the Main Terminal building. Further, at Section 3.4, Visual and Aesthetic Resources outlined the approach view of Dulles International Airport regarding the introduction of an aerial guideway. The document states that the "current design requires only a single bent to cross the inbound DIAAH lanes" (page 3-22) and references Figure 3-11 for visualization. The visualization shown in Figure 3-11 has two bents; therefore, an updated image with the current design of only a single bent should be provide to enable proper evaluation of visual impacts.

Chapter 3, page 3-27. Mitigation, Historic Architecture. Several alternatives for potential interpretation of the historic properties within the National Register-eligible Historic District are cited. However, no commitment is made that any of these alternatives will be implemented, only that they will be considered. A commitment is needed for implementation and needs to be specifically stipulated in the Draft Section 106 MOA (see Appendix D) that is currently being updated. There are several viable alternatives identified in this section of the

EA that would enhance the visitor experience while educating one on this important architectural resource.

Chapter 4, Page 4-5. Historic District and Contributing Resources. Discussion of the Dulles Airport National Register-eligible Historic District tentatively defined in 1989. A National Register nomination should be prepared for the Dulles Airport Historic District as part of the mitigation. This could be specifically stipulated in the Draft Section 106 MOA (see Appendix D) that is currently being updated.

CULTURAL RESOURCES

Construction of the Route 28 station (Innovation Center Station) included associated parking and storm water management area may have potential impacts on Site #44FX2233. This 19th century domestic site has not been formally evaluated for National Register of Historic Places; therefore, a Phase I archaeological survey is recommended. If significant sites are found, a Phase II archaeological testing is recommended in order to determine if sites are eligible for inclusion into the National Register of Historic Places. If sites are found eligible, avoidance or Phase III archaeological data recovery is recommended.

ENVIRONMENTAL IMPACTS/RESOURCES

Resource Protection Area
The EA notes that there would be a 0.44-acre encroachment into a Resource Protection Area (RPA) at the Route 28 station (Innovation Center Station) site, north side facility. The EA indicates that the Metropolitan Washington Airports Authority (MWAA) would request an exception under the Chesapeake Bay Preservation Ordinance for the proposed encroachment. MWAA should not assume that the exception request will necessarily be approved; rather, early coordination with the Fairfax County DPWES – Land Development Services staff should be pursued in order for MWAA to identify issues/concerns that may be associated with the exception request.

Wetlands
The Environmental Assessment indicates that there would be a net increase in wetland impacts from Phase 2 of the project from 5.2 acres to approximately 5.8 acres as a result of the proposed design refinements. Fairfax County recognizes that at least one of the additional areas of wetland impacts (wetland W-60) would ultimately be lost to private development if it was not affected by the Metrorail extension project. However, another wetland area, W-80 near Herndon-Monroe (Herndon Station), would experience increased impacts as a result of the design modifications as outlined in the EA, with the expansion of the proposed parking

garage to the west of the existing parking garage, and it is not clear that such impacts would be inevitable absent Phase 2 of the project.
The EA indicates that mitigation for wetland impacts will be sought through the purchase of credits at an approved mitigation bank. It is noted that this is consistent with the mitigation measures noted in the Final Environmental Impact Statement and Record of Decision; the document notes that "...all project impacts would occur within Hydrologic Unit Code (HUC) 2070008." HUCs are relatively large areas; it is not clear how close to the areas of impact the mitigation measures will be pursued. Consideration should be given to pursuing wetland mitigation efforts within the same watersheds as the areas of impact, as described below.

Stormwater Management
The EA states that the revised LPA represents a slight increase in imperviousness compared to the original LPA. Fairfax County is requesting an estimate of the increase and an indication of the total amount of impervious area for Phase 2 of the project.

The EA states that stormwater management (SWM) ponds in flight path areas (including the maintenance yard) must be dry ponds due to Federal Aviation Administration (FAA) requirements. Not counting the five maintenance yard ponds, the County is requesting an indication of which of the ponds listed in section 2.1.4 of the EA are located in flight path areas and which are not. In addition, with the exception of SWM #1A, described as "extended detention," the County requests further information indicating if all ponds located outside flight path areas will be wet ponds.

Comments on specific SWM facilities as described in section 2.1.4 of the EA:

- Several of the facilities listed mention sand filters. Sand filters are typically used as a component of a treatment train to remove pollution from stormwater. Additional performance enhancement options (see below) should be considered to increase treatment before discharge to receiving waters, to groundwater or for collection and reuse.
- As noted above, SWM #1A is described as an "extended detention" pond. What will be the detention time of this pond compared to the other ponds listed under 2.1.4?
- SWM #3A mentions inclusion of a "storm filter." It is not clear if this is a reference to a cartridge media treatment system (such as StormFilter, or similar) or to some other kind of BMP.
- SWM #14 is to be "retrofitted for quality control." Assuming that this refers to retrofits to provide or improve water quality benefits, additional information is needed on the nature of the proposed retrofits and the expected benefits.
- SWM #6A is described as "an underground facility." It is unclear whether "underground" refers to containment/storage, detention or retention of stormwater runoff. More information is needed. If tank storage is being considered, this may present an opportunity for rainwater capture/reuse at the Herndon-Monroe station (Herndon Station).

Information on the storage capacities, detention times and water quality benefits of existing and proposed SWM ponds is needed to more fully evaluate the efficacy of the proposed stormwater mitigations. Ideally, stormwater best management practices (BMPs) should be used to manage and detain runoff as close to the source as possible. Over-detaining in areas where controls exist to offset the lack of controls in other areas should be avoided to the maximum extent practicable. Low Impact Development (LID) techniques and practices should be pursued as much as possible in order to reduce stormwater runoff pollution and facilitate infiltration at the source. Examples of these types of techniques include vegetated swales, infiltration trenches, sand filters and porous pavement. In areas where conventional stormwater management ponds are to be used, it is recommended that these be designed with enhanced pollutant removal features such as micro-pools and wetland vegetation to optimize water quality benefits.

The EA states that increased wetland losses and minor impacts to aquatic habitat are expected. It is highly recommended that impacts to streams and wetlands be mitigated as close to the project (and within the watershed) as possible, when and where impacts are unavoidable.

No preferred Runway Protection Zone (RPZ) alternative is indicated in this EA. A separate EA to more fully evaluate RPZ alternatives is to be issued in the future and was discussed between Mr. Karl Rohrer, Phase 2 Deputy Project Manager, Dulles Corridor Metrorail Project and Ms. LeAnne Astin, Fairfax County Department of Public Works and Environmental Services (DPWES). Project implementation would be in accordance with Dulles Airport's existing Virginia Pollutant Discharge Elimination System (VPDES) permit and Stormwater Pollution Prevention Plan. Based on staff discussion and by way of these comments, staff from the Fairfax County DPWES – Stormwater Planning Division is requesting the opportunity to review and comment on the RPZ mitigation project when the RPZ EA is released.

Staff from the County's Stormwater Planning Division has worked in collaboration with other agencies to incorporate several enhanced stormwater management practices and outfall treatments to help mitigate the potential damages to streams from these types of projects. Stormwater Planning Division staff stands ready to work with and assist to effect appropriate environmental impact mitigation.

Watershed Characteristics

The scope of Phase 2 of this project within Fairfax County falls within the Sugarland Run and Horsepen Creek watersheds. The *Sugarland Run and Horsepen Creek Watershed Management Plan* provide details on four watershed management areas (WMAs), within which this project is located. These WMAs exhibit the following watershed characteristics that are relevant to this project:

Sugarland Run WMAs (Headwaters and Upper Sugarland)

- Approximately 75 percent of this portion of Sugarland Run watershed within Fairfax County is not treated by an existing stormwater facility.
- Approximately 85 percent of these two WMAs are urbanized.
- The project area consists primarily of commercial and industrial land uses, along with transportation networks.
- Based upon existing watershed data, the majority of the streams are in poor condition.
- Most of the project area shows high levels of stressors and pollutant sources.

Horsepen Creek WMAs (Lower Middle and Merrybrook)

- Approximately 85 percent of this portion of Horsepen Creek watershed within Fairfax County is not treated by an existing stormwater facility.
- Approximately 75 percent of these two WMAs are urbanized.
- The project area consists primarily of commercial and high density residential land uses with open space along stream corridors.
- Based upon existing watershed data, the watershed area is in moderate condition.
- Most of the project area shows moderate levels of stressors and pollutant sources.
- According to the 2004 Fairfax County Stream Physical Assessment data, the streams within all four of the impacted WMAs are classified as Stage III in the Channel Evolution Model. This indicates an environment of unstable channels that are experiencing significant bank erosion. These streams are still actively enlarging in response to increased stormwater runoff volumes and velocities.

These areas of Sugarland Run and Horsepen Creek are highly urbanized with little stormwater management and actively eroding stream channels. This channel enlargement results in accelerated erosion and deposition, which highly degrades water quality and riparian and aquatic habitats. This project will likely increase the impervious area draining to these streams, thus impacting and/or worsening the conditions if stormwater runoff is not adequately treated.

Potential Stormwater Projects

The *Sugarland Run and Horsepen Creek Watershed Management Plan* outlines potential stormwater improvement opportunities that are relevant to the Dulles Corridor Metrorail Project. The plan can be found online at: http://www.fairfaxcounty.gov/dpwes/watersheds/. It is suggested that these identified projects should be evaluated as potential mitigation areas that exist within the impacted watershed. Staff from DPWES – Stormwater Planning Division welcome discussion regarding the projects noted below that could mitigate project impacts.

Structural Projects

The following structural projects are designed to reduce stormwater runoff volumes, decrease peak flows, reduce pollutants in stormwater runoff and improve overall habitat and stream quality.

- HC9200: Horsepen Creek stream banks are eroded and incised in a park-like area below Parcher Avenue. Retrofit culvert with micro pool above Parcher Avenue and install small basin below athletic court to control stormwater flows. Re-grade and stabilize stream banks, vegetate stone drainage channels and install check dams, restore buffer and install educational signage. (Near Parcher Avenue and Monaghan Drive, next to the Reflection Lake pool.)
- SU9147: Retrofit existing dry pond (DP0372) to enhanced extended detention basin with marsh areas and proper outlet structure; daylight inlet pipes and remove concrete trickle ditch to improve pond efficiency and provide improved treatment for professional building complex. (Near Edmund Halley Drive and Sunrise Valley Drive.)

Non-Structural Projects

The following non-structural projects are designed to reduce stormwater flow volumes and decrease peak flows in areas lacking sufficient stormwater management with limited opportunity for new structural stormwater controls. Project implementation will also promote sediment deposition, decrease erosion, improve water quality and increase wildlife habitat.

- HC9907: Obtain conservation easement and restore buffer around a series of wet ponds at the intersection of Dulles Toll Road and Centreville Road.
- SU9906: Vegetate several existing County dry ponds throughout Sugarland Upper WMA - DP0564, DP0421, DP0440 and DP0202. Vegetate the existing dry pond northwest of Van Buren Street and Worldgate Drive and the existing swale northwest of Town Center Parkway and New Dominion Parkway. (Near Fairfax County Parkway and Sunset Hills Road.)
- SU9907: Obtain conservation easement and restore buffer at least 100-foot wide around the streams northwest of Fairfax County Parkway and Dulles Toll Road to provide nutrient and sediment removal and flood control for area slated for industrial development. (Stream corridors near Herndon Parkway and Fairbrook Drive.)
- SU9910: Restore riparian buffers at the southwest corner of the intersection of the Fairfax County Parkway and Dulles Toll Road.

Additional information on the Sugarland Run and Horsepen Creek Watershed Management Plan may be obtained at the Fairfax County Watersheds web site at http://www.fairfaxcounty.gov/DPWES/watersheds/.

Should you have additional questions or need further clarification on these comments please contact me or Nick Perfili, Dulles Rail Project Planner, at 703-877-5600 at your convenience.

Sincerely,

Mark Canale
Project Manager
Dulles Corridor Metrorail Project

MC/np

cc: Tom Biesiadny – FCDOT
Nick Perfili – FCDOT
Michael Garcia – FCDOT
Leonard Wolfenstein – FCDOT
Pamela Nee – DPZ
Noel Kaplan – DPZ
Marianne Gardiner – DPZ
Linda Blank - DPZ
LeAnne Austin – DPWES
Sandy Stallman - FCPA

[redacted]

Washington Airports Task Force

[redacted]

Washington Airports Task Force Comment on
Dulles Corridor Metrorail Project Phase 2
Extension to Dulles Airport/Route 772

Preliminary Engineering Design Refinements
Environmental Assessment

June 22, 2012

Mr. Karl A. Rohrer
Deputy Project Director
Phase 2 – Dulles Corridor Metrorail Project
1593 Spring hill Road, Suite 300
Vienna, VA 22182

Dear ~~Mr. Rohrer:~~ Karl

I represented the Washington Airports Task Force at the public hearing on 13 June 2012 at Herndon High School where modifications and adjustments made to the Environmental Assessment Study for Phase II of the Rail to Dulles project were presented.

The Washington Airports Task Force and its Board of Directors support the revision as presented. We appreciate that key comments the Task Force submitted on September 30, 2010 are reflected in this most recent presentation.

We also applaud the joint Loudoun County/MWAA/adjacent landowner initiative to develop 10 million sq. ft. of transit-related economic development around the Route 606 station, and the Task Force continues to stress the following points made in our 2010 submission concerning the Route 28 station and Horsepen Bridge, and the Route 606 station.

[redacted]

Route 28 or CIT Station

- **Provision should be made for pilings to carry the Horsepen Bridge across the corridor immediately to the west of the station.**
- A major opportunity exists on the north side of the station to improve road access to the CIT and Dulles World Center area from the Dulles Toll lanes through an east-only connection, which would involve a further bridge. This bridge should be allowed for immediately to the east of the station. This opportunity evolved from the WATF's work to resolve the Horsepen Bridge problem and can be explained elsewhere in greater detail.
- Further, the north side of the station currently is bordered by what is essentially a manmade swamp, now defined as a "wetlands". As the region is expected to add 1.6 million jobs, which will require an additional two million households over the next 20 years, the appropriate authorities should give serious consideration to mitigating this "wetlands" elsewhere, to redirecting the stream and to developing two million-plus sq. ft. immediately adjacent to the north side of the station as the region evolves.

Route 606 Station

- The WATF believes that the project includes provision for the county or a third party to build southern parking and a southern access to the ticketing area of the station. The WATF strongly supports this provision.
- South Riding and other substantial residential areas lie to the south of Route 50, accessible to the station via Route 606. Further, Route 606 is the core of Loudoun County's only industrial corridor and is expected to house approximately 30,000 employees or more by 2030. Consequently, there will be a substantial need to connect the station to these employment and residential centers, and to provide adequate south parking.
- The project's responsibility to this future Route 606 station need should be limited to:
- The provision for the aforementioned future south access to the station's ticketing area.
- The placement of storm water management or any other related facilities where they will not seriously impede these future developments.
- Loudoun County's policy of limiting landside development associated with the station to Transit Related Economic Development (TRED) should be sustained for aircraft noise reasons.

Regarding impacts on the Dulles historic district: as the aboveground station at Dulles Airport is essentially grafted onto the front of the north side structured parking, we do not believe it will have any negative impact on the architectural splendor of the Saarinen Terminal. Rather, the aboveground location will give rail riders a singularly impressive view of the airport terminal.

Overall, the station refinements for Phase 2 will enable the land uses to take more benefit from the creation of the rail stops. Consequently, there should be a small, beneficial effect on economics, air quality, and the other social matters listed on your Slide 18.

We fully support phase II of the Rail to Dulles and urge to you proceed without delay.

Sincerely,

Keith Meurlin
Vice President, Washington Airports Task Force

FW: Comments on Environmental Assessment Relative to Phase 2

Rohrer, Karl

Sent: Tuesday, June 26, 2012 9:53 AM

To: eacomments

From: Dennis Dayton [redacted]
Sent: Sunday, June 24, 2012 10:06 PM
To: writtentestimony
Subject: Comments on Environmental Assessment Relative to Phase 2

The EIS and Amended Record of Decision dated November 17, 2006 contains references to traffic and transportation matters (page 11) and acknowledgea changes in traffic conditions. The studies do not address the overall traffic effects. There is a lack of information on the nature of and design of road improvements to complement construction of the transit line and the Dulles Toll Road. This absence of detail on specific improvements, including the timing of such impovements, when combined with the lack of certainty on the funding for construction of parking facilities for Phase 2 creates uncertainty with respect to traffic flow in Reston, Herndon and beyond. In particular, the lack of traffic flow planning and mitigation on Reston Avenue, Fairfax Parkway, Route 606, Sunrise Valley Road, Sunset Hill Road and Hunter Mill Road is a serious deficiency in intermodal transportatin planning for the Dulles Corridor. The Metropolitan Washington Airports Authority has made committments to the Commonwealth of Virginia to provide significant funding for such traffic studies and road improvements, but these studies and transportation improvements are now being eliminated or simply not addressed. In addition, the Metropolitan Washington Airports Authority presented a financial plan to the Commonwealth of Virginia in relation to its take over of the Dulles Toll Road that relied upon TIFIA as a significant funding(approximately $300-400M) source so that such improvements would be made without causing tolls to increase beyond the rate of inflation. This funding plan appears to be in doubt and thus leaves the existing transportation network of two lane roads to handle current demands as well aa new growth. In addition, the lack of funding from other sources guarantees that tolls will increase significantly thereby making the inadequate existing network a relief mechanism for toll avoidance. The tolls will burden existing streets with traffic volume that such streets are not designed to carry. The new volumes will create queing and branching channels that will cause significant detrimental effects the transportation needs of residents and citizens of both Fairfax and Loudoun Counties.

The EIS and EA are inadequate to show that the transportation facilities are not being overtaxed because of the lack of a plan to have road imporvements put in place to support the Dulles Corridor Metrorail Project. As a citizen of Fairfax County that uses the local roads, the Toll Road, and Dulles Airport my access is being adversely impacted because traffic is backing up on Route 7, being diverted off Route 7 onto Beulah Road, backing up on Beulah Road, Browns Mill Road, Crowell Road, Hunter Mill Road. I am being preventing from using other roads because of congestion.

The EA is not adequate and fails to address these significant changes in the circumstances relating to the transportation impacts outline in the original EIS.

Dennis M. Dayton
Citizen of Fairfax County

FW: Dulles Corridor Metrorail Project - Phase 2 EA

Rohrer, Karl

Sent: Tuesday, June 26, 2012 9:52 AM

To: eacomments

From: Dennis Dayton [redacted]
Sent: Monday, June 25, 2012 1:54 PM
To: writtentestimony
Subject: Dulles Corridor Metrorail Project - Phase 2 EA

The following comment is made with respect to the EA as posted on the internet and and EIS for the Dulles Corridor Metrorail Project as enumerated in FAA and FTA record of decision as amended in March 2006. These documents do not address the significant issues that now exist at Dulles Airport concerning the Y-15 Yard Site. Use of the Yard Site was not addessed in the EiS. The use of the site for a stockpile was introduced in the EA of February 2006-Figure 2-17-Paragraph 2.4 Summary-Use Y-15 YARD STE ON DULLES PROPERTY FOR CONSTRUCTION STAGING AND SOIL STORAGE. This figure shows the location and the division ofthe site into four components -a rectangulr area for soil stockpile and three areas for precast fabrication and storage. The following descriptive dialogue is included in the 2006 EA:

2.1.3 PE Wiehle Avenue Extension Yard Facilities

* * *

The Final EIS Wiehle Avenue Extension would **not** include any improvements or construction actinities at the future S&I Yard Site 15, which would be constructes as part of the project's second phase, the Extension to DullesAirport/Route 772.

* * *

2.2.3 PE Wiehle Avenue Extension Yard Facilities

* * *

A portion of the future Y-15 aite on Dulles Airport property (approximately 36 acres) would be used for constructin staging, precast concret fabrication, and precast storage for the PE wiehle Avenue Extension. The site would be use to stockpile soild from the **excavation and tunneling activities in Tysons Corner.** The excaate soil would be stored for possible later reue as fill, or possibl to construct a berm alon Old Ox Road (Route 606) to screen future yard operations. All soil placed on this site would be placed to avoid any know wetlands and with proper sediment and erosion contol. Figure 2-17 depicts the proposed layout of the Y-15 site for these uses. In addition, soil will be placed on this site **in coordination with MWAA to ensure soil compaibility with local conditions.**

Notwithstanding the foregoing explicit guidance, Dulles Airport property and travelers on Route 606 have not been protected. The Dulles Airport property has been used in a manner that has resulted in significant degradation to its intended use. The Dulles Airport property has been a soil disposal depot for Phase 1 for soil from innumerable sources. A visit to the site would reveal huge unseeded piles of soil without designation. It is not located in accordance with Figure 2-17. In addition, traffic control lanes have not beem constructed. In addition, the volume of truck traffic has hindered traffic flow on Route 606. The EA does not address when and how the soil will be used. From the size of the piles and the locationn the local area and neaby water courses are potential sites for runoff or other deleterious effects. Remarkably, it would appear that the cost of off haul have been eliminated from the cost to the Phase 1 contractor notwithstanding its obligation to dispose of the

soil.

The EA should have included mitigation measures including testing of the soil, off haul plans, new traffic arrangements for 606 including, signalling.

The current situation is a change of circumstance from the EIS and 2006 EA that requites a full impact statement to portect the wetlands and watercourses that traverse Dulles Airport.

Dennis M. Dayton
Resident of Fairfax County Virginia
Dulles Airport User

FW: Dulles Corridor Metrorail Project Relocation of Dulles Airport Station

Rohrer, Karl

Sent: Tuesday, June 26, 2012 9:52 AM

To: eacomments

From: Dennis Dayton [redacted]
Sent: Monday, June 25, 2012 3:01 PM
To: writtentestimony
Subject: Dulles Corridor Metrorail Project Relocation of Dulles Airport Station

Comment:

One of the major revisions enumerated in the EA for Phase 2 is the movement of the Dulles Airport Station on the Airport Property and the construction of an above grade facility supported on piers. The apparent cost savings measure contemplates a connection to current underground walkways. The EA does not include a comprehensive Geotechnical Study of the effects on the new construction on the ground water levels and movements near and around the walkways and other facilities. The new alignment will involve new supporting structures that will create a network of water routes that could adversely affect the current walk way structures and their interiors. The current walk ways appear to have water leakage issues that will be further exacerbated by the newly created underground water network. The EA fails to address the long term effects on ambient air in the walk ways and the current condition of existing finishes and equipment such as moving sidewalks and escalators and elevators. The capital cost savings are not identified in specifics. Furthermore, there is no life cycle study that addresses water leakage, grouting, and mold control measures that may be necessitated by the new configuration. A full life cycle cost analysis should be made for all of the facilities-rail station, escalators, elevators, moving sidewalks, interior finishes, water removal, mold control on all underground surfaces.

The evaluation of cost savings capital and O & M should be published before a decision is made. In addition, a study should be performed on the existing condition of walkways that will serve the new station to assess potential for mold and other conditions that might affect users.

Dennis M. Dayton
Resident of Fairfax County
User of Dulles Airport

DULLES CORRIDOR METRORAIL PROJECT -ENVIRONMENTAL ASSESSMENT PHASE 2 -COMMENTS

Rob Whitfield [redacted]

Sent: Monday, June 25, 2012 4:59 PM

To: eacomments

DULLES CORRIDOR USERS GROUP

[redacted]

Mr. Karl Rohrer
Deputy Director -Phase 2
Dulles Corridor Metrorail Project
1593 Spring Hill Road, Suite 300
Vienna, VA 22182

RE: Dulles Corridor Metrorail Project Phase 2
Preliminary Engineering Design Refinements -Environmental Assessment - Comments

June 25, 2012

Dear Mr. Rohrer:

This letter is filed in response to the June 6 announcement by the Metropolitan Washington Airports Authority (MWAA) regarding the Phase 2 Dulles Rail (DR) Environmental Assessment (EA) report and public hearing held on June 13, 2012 at Herndon High School. These comments are preliminary in nature. I reserve the right to amend and supplement these comments based on information not yet available from the EA or other MWAA sources about issues which will have a material impact on Dulles Corridor residents and businesses due to MWAA's plan of finance for Phase 2.

http://www.dullesmetro.com/documents/12JUNE6_EA_PublicHearingRelease.pdf

I attempted to attend the public hearing on the EA for DR Phase 2. A bad traffic accident on Route 7 in Loudoun County delayed my arrival at the High School until about 7.40 pm.

When I arrived, no signs directing the public to the hearing were visible either on nearby public streets or on school grounds. I spent nearly 15 minutes walking from one end of the building front to the other, trying to open doors and dialling the school communications system in an unsuccessful attempt to gain entry to the building.

Assuming that I had come to the wrong building, I called a friend to check online for the correct street address.

As I was leaving the front of the building at about 7.55 pm, I saw Shiva Pant, Chief of Staff for the Washington Metro Area Transit Authority (WMATA), driving out of the parking lot. He said that the hearing was held in a gymnasium at the rear of the building. I told him about the lack of signs visbile to direct the public. He informed me that only three people had spoken at the hearing and that the meeting had concluded at about 7.30 pm.

By limiting the scope of issues addressed in the EA to those pertaining to *Preliminary Engineering Design Refinements,* those issues of most importance to the general public have not been addressed. Most notably, the EA ignores severely degraded air quality and adverse traffic congestion impacts that will result from increased commuter travel on local roads along the Dulles Corridor and in Tysons Corner after DR Phase 1 opens. MWAA's Dulles Toll Road (DTR) Traffic and Revenue Consultant - CDM Smith - in early 2012 projected that some 18 million vehicles annually will divert from the DTR to local roads. This traffic diversion will be worsened by MWAA's DR Phase 2 finance plan, which relies on DTR tolls to pay for 75% of its projected capital funding costs. MWAA admits that under its finance plan, absent other financing schemes, DTR tolls will double in 2013, triple by 2018 and are projected by MWAA to reach $17 or more each way in the 2040s.

Since June 2011, at the direct request of US Department of Transportation Secretary Ray LaHood, eight or more closed door meetings have been held regarding the planning and funding of DR Phase 2 attended by representatives of USDOT, MWAA, WMATA, the Federal Transit Administration, Virginia Department of Rail and Public Transportation (VDRPT) plus Fairfax and Loudoun County officials.

These meetings were held in direct contravention and wilful violation of the US Department of Transportation's "Open Government Initiative." Several attempts to attend these meetings by media representatives and the public, myself included, were ignored.

http://www.dot.gov/open/

Since 2007 or earlier, MWAA has held many Board and Board Committee executive session meetings regarding Dulles Rail costs and Dulles Toll Road toll plans. The press and Dulles Corridor stakeholders, notably representatives of Dulles Toll Road users, were excluded from decisions made in various USDOT and MWAA meetings, many which have had, and will continue to have, a material impact on the public.

The projected capital costs of DR have more than doubled since the final EIS was

prepared in 2004. The federal government has repeatedly declined since 2002 to provide any additional capital funding or financial assistance for DR Phase 2 since the FTA cap of $900 million in "New Starts" funding for Phase 1 was set. **Nowhere else in the United States has a public transit project been funded so heavily dependent on local taxpayers who have had no voice in the decision making process and are not the direct beneficiaries of the rail project. NO PUBLIC HEARING WAS EVER HELD BY MWAA, DRPT OR WMATA TO EVALUATE POTENTIAL FUNDING OPTIONS AND OBTAIN PUBLIC INPUT ON FINANCIAL ALTERNATIVES FOR DULLES RAIL PHASE 2.**

It is patently bogus for MWAA, USDOT, WMATA, VRDPT and local government officials to assume that the locally preferred "heavy rail" alternative adopted circa 2002, when the total 23 mile project cost was about $3 billion, incorporated in the March 2005 Record of Decision, remains the locally preferred option for traffic congestion relief and for providing improved mobility. The EIS was premised on 50% US government project funding. The first 103 miles of the Metrorail system was funded by 75+% in federal grants. Despite holding many meetings, US, Virginia, MWAA, WMATA and local officials have made NO public effort to explore far more cost effective bus transit options and financing alternatives which are likely to result in less traffic congestion and ameliorate adverse air quality impacts of planned rail operations in the Dulles Corridor and Tysons Corner.

The doubling and tripling of DTR tolls will cause potentially severe short term and long term economic impact to and harm residents and businesses in the Dulles Corridor who are reliant on using the Dulles Toll Road. Many of these DTR users do not live or work near Metrorail stations and will not have the option of using the Silver Line. This impact has not been addressed as part of the socio-economic impact analysis in the EA. While some commuters will ride the Silver Line, particularly those who live near existing Metrorail stations, most commuters will continue to drive single occupant automobiles for the foreseeable future.

A recent study for the Metropolitan Washington Council of Governments Transportation Planning Board showed that only 7% of Reston residents presently use public transit. Local traffic experts predict that only 15% of all Tysons Corner and Dulles Corridor commuters, particularly those from Arlington County and Washington DC and those who live near existing Metrorail stations will use the Silver Line. Most of the remaining commuters will continue to use automobiles. Due to provisions of the WMATA compact, the Inside the Beltway jurisdictions are not obligated to help fund the Dulles Rail project but no similar restriction appears to exist to preclude those same jurisdictions from seeking funding from Loudoun County for projects Inside the Beltway.

Much increased traffic congestion will result from the induced development impacts of

the DR project as a result of massive planned increases in property development densities in Tysons Corner, Reston and Herndon in Fairfax County as well as in eastern Loudoun County. These impacts have not been addressed in the original DR EIS or the EA.

It appears that WMATA, the agency which helped prepare the Draft Environmental Impact Statement in 2002 and the Final EIS in 2004 has attempted to prevent public awareness of the potential adverse changes in rail ridership. The data in the EA relies on outdated and inaccurate information in the 2004 EIS. Federal regulations require data to be based on current and projected conditions. The radical change in the proposed financial structure for DR that has occurred since 2004 and the transfer of responsibilty for building the project from the VDRPT to the Metropolitan Washington Airports Authority (MWAA) are not addresssed.

Finally, WMATA appears to be attempting to piggy-back its responsibilities in regards to its WMATA compact obligations by conducting a joint public hearing.

I will add to this information shortly.

Robert Whitfield

METROPOLITAN WASHINGTON AIRPORTS AUTHORITY

WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY

PUBLIC HEARING 575

Dulles Corridor Metrorail Project - Phase II

Preliminary Engineering Design Refinements

Environmental Assessment

Wednesday, June 13, 2012

7:00 p.m.

P R O C E E D I N G S

MR. NOWAKOWSKI: My first order of business is to introduce everyone up here at the head table. To my immediate right is Jim Dyke, a member of the WMATA board. To his right, Catherine Hudgins, Chairman of the WMATA board. To Cathy's right is Mort Downey a member of the WMATA board.

At the side table there is Karl Rohrer. Karl is the executive -- I'm sorry, is the deputy project director for Phase 2 of the Dulles Metrorail Project. To Karl's right is Dan Koenig. Dan is with the Federal Transmit Administration. And to his right is Jim Ashe who's an environmental engineer with WMATA.

I don't know that we have any public officials that actually made it and that were planning a review, Cathy, so I think we've covered that item.

And with that, one, I want to welcome everybody to this event. It's important to moving the Phase 2 of the project forward. We're excited to get this underway.

And Cathy will come up and get us started on our meeting. Cathy.

MS. HUDGINS: Thank you. Good evening. I'm Cathy Hudgins and I have a prepared statement that I must make. And if you will bear with me, we'll get through it and get to the presentation, testimony and public hearing.

My name is Catherine Hudgins and I currently serve as chair of the board of directors of the Washington Metropolitan Area Transit Authority.

This hearing has been convened by the Metropolitan Washington Airports Authority (MWAA), the Washington Metropolitan Area Transit Authority (WMATA), and the Federal Transit Administration in compliance with the applicable requirements of the National Environmental Policy Act of 1969 as amended, the National Historic Preservation Act and the Washington Metropolitan Area Transit Authority Compact.

This public hearing is being held to receive and consider comments from the public on the environmental assessment and the potential effects to historic resources from the preliminary engineering design refinements to the second phase of the Dulles Corridor Metrorail Project, a proposed Metrorail

extension in Fairfax and Loudoun Counties in Virginia, which is WMATA Docket R12-01.

The Federal Transit Administration is the lead federal agency for the project with the Federal Aviation Administration a cooperating federal agency.

Notices for the hearing were published on the Project's website, the Airport Authority website and the WAMTA website. Notices also appeared in The Washington Post, The Washington Hispanic, El Tiempo Latino, El Pregonero, India This Week and Express India newspapers.

The environmental assessment was available for public review beginning on May 16th, 2012, at the Project office at WMATA's headquarters, on the Project website, on WMATA's website and at the public libraries and community centers in Fairfax and Loudoun Counties.

General project plans called "Proposed Refinement to the General Plans," were available for inspection at WMATA headquarters, the libraries and the Project office beginning on May 16th, 2012.

Now, I will briefly cover the procedure that we will follow during this hearing. First, we will

hear a presentation on the environmental assessment. Then we will hear from those persons who are registered on the witness list, beginning with elected officials who will be allowed five minutes each to make your comments. Other person who registered will then be called in the order that they registered and receive three minutes each for comment.

If you would like to sign up to give testimony, but have not done so yet, please see Ms. Pena, and I have to see which direction she is, far in the back, at the speaker registration table at this time.

Relinquishing of time by one speaker to another is not permitted and we will not be answering questions during the testimony in this public hearing. There is a timer here, it's in front here, and -- I'm sorry, I lost my place. There is a timer here that will count down how much time you have left to speak. It will give you a warning beep when your time is up.

Before you begin your remarks, I will ask you state your name and the organization you represent, if any.

Please note that any personal information, such as name, address or telephone number, you provide in the statement may be releasable to the public under the WMATA Public Access to Records policy.

There will be a verbatim transcript of the hearing. Copies of the transcript may be purchased from Capital Reporting Company, who's telephone number is 202- 857-3376. The transcript will also be included in the public hearing report, which will be posted on the Project's website.

Following the public hearing, the Metropolitan Washington Airports Authority and the Metropolitan Washington Area Transit Authority will review the testimony and your comments which will become part of the public record and included in the report on the public hearing.

A Public Hearing Report will be circulated for ten days to allow public review and comment. At the completion of the public review and comment period, MWAA and WMATA boards of directors will act on the proposed refinements, after considering the public hearing record and the Public Hearing Report.

After review of the public hearing comments and responses, the Federal Transit Authority will amend its record of decision for the project, if appropriate.

Now here to start, the presentation by Mr. Karl Rohrer, the deputy project director for Phase 2 of the Dulles Corridor Metrorail Project.

MR. ROHRER: Thank you and good evening. Thank you all for coming to tonight's hearing on the Environmental Assessment for Phase 2 Preliminary Engineering Design -- excuse me, Design Refinements.

This hearing will also address potential effects of historic resources and provide an opportunity for the public to comment in accordance with Section 106 of the National Historic Preservation Act.

I'm sure that many of you have been following the project for many years, but let me briefly cover a little history and background.

This is a map of the corridor, that's the location of the Dulles Corridor Metro, right, now also known as The Silver Line for Metro, will extend from the current orange line here, to Route 772 in Loudoun

County, traveling down the Dulles International Access Highway and through the airport. It's a length of approximately 23 miles.

The project is being constructed in two phases. First phase, as many of you know, driving through Tysons Corner and out on the Access Highway and Dulles Toll Road under construction to Wiehle Avenue which goes to here in Reston. It's 11.7 miles.

The second phase will be 11.4 miles and will go from Wiehle Avenue out through Dulles Airport and to Route 772 in Eastern Loudoun County.

The design refinements and environmental assessments that are the topic of tonight's hearing, concern the second phase of the project, known as the Extension to Dulles Airport and Route 772.

Tonight's hearing will provide an overview of the design refinements that we made during preliminary engineering for Phase 2, an explanation of why we're doing the environmental assessment. Sometimes they're known as an EA. And a review of the anticipated changes in the environmental effects from those previously disclosed in the other environmental

documents for the project.

This is also an opportunity for us to hear your comments on the proposed design refinements. The EA and the hearing do not address matters related to project funding or contracting approaches for the project.

I'm sure many of you are wondering why an environmental assessment was prepared at this point in the project. Based on prior environmental reviews of the project, the Federal Transit Administration and the Federal Aviation Administration issued separate records of decision for the entire project in 2005; the FTA record of decision was later amended in 2006, to address design changes in the project's first phase.

The terms of both of these records of decisions required that additional environmental analysis be completed, if design changes are made and the effects of those changes is -- are unknown.

As preliminary engineering -- the preliminary engineering design progressed, several design refinements were identified that required additional environmental review, in order to comply with federal

regulations and environmental statutes.

Therefore, the environmental assessment document was prepared to describe and document the changes in environmental effects and to compare those effects to those previously disclosed in the project's final environmental impact statement.

The PE design refinements that are the subject of tonight's hearing resulted primarily from more detailed engineering, additional information about site conditions, the planned construction approach, updated design criteria and permit requirements in efforts to reduce project costs.

What I'm going to do next in the presentation is go through what we consider the major design refinements and talk about each one. They're listed here and there's a summary of those. I'll go through them in more detail when we discuss each one, but in summary, they're changes at the Herndon-Monroe Station, the Route 28 Station, both in Fairfax County, the change in the alignment and station at Dulles Airport and then there's a change to the station facilities at Route 772 in Loudoun County. There's also some -- there

were also some changes to the rail yard which is located on the airport itself, in the northwest corner of the airport.

There are also some minor changes that are described in the environmental assessment that I'll discuss later in the presentation.

So, the first major design refinement is at the Herndon-Monroe Station facility on the south side, so we're talking -- I hope you can see this, the station is here, on the south side the facilities were modified to include a single parking structure on the west side of the existing parking structure, instead of two structures. Earlier two structures were planned. The total number of new parking spaces would remain the same, 750, but because of the new structure would accommodate more parking, it has a larger footprint than the old structure and would be slightly taller.

At Route 28 Station, refinements were made to the north side station facility at the request of Fairfax County to enhance the station's integration with adjacent development. What happened was at Route 28 the -- you'll see the station here, the entrance in

the final diagram is over in this open field, and the entrance has now been moved adjacent to the Center for Innovative Technology Building.

At Dulles Airport, as a cost reduction measure, there was a change in the alignment type and station location. The tunnel alignment and underground station, which previously were running through here, through -- underground through here, were changed to elevated or aerial guideway and an elevated station next to the north parking garage.

This slide -- the next slide shows a picture of kind of a representation of how the station looks and operates as a kind of a cut through. Passengers using this station would get off the train on the platform, travel down the escalator to a station lobby that's on the same level as the pedestrian tunnel that's at the airport. Those of you who have used the north garage are familiar with the pedestrian tunnel.

There are moving sidewalks in the pedestrian tunnel and it's about 1,200 feet to the main terminal. The layout is similar with other aerial stations, like I said, a center platform, there will be a canopy above

it. There will be escalators, stairs and elevators down to the lobby level and then a direct tie-in to the pedestrian tunnel. It's somewhat similar to what is at National Airport where you're on a head bridge and then the station is off on one side.

At Route 772 there were some refinements made to the south side station facilities, which are here. Here's the station and Route 772 is up here. At the request of Loudoun County to enhance the station's integration with adjacent development. The size of the station facilities on the south side are smaller now and approximately 300 spaces of surface parking were eliminated to -- and the bus bays, in this lot were reconfigured, that used to take up this whole area, and moved to a new location to accommodate and maximize land availability for transit-oriented development.

The last major environmental refinement is at the yard. As I said, the yard is on the northwest corner of the airport. This is Route 606, this is the Dulles Greenway, the airport is (inaudible) from the northwest corner.

The land configuration of the yard has

changed to enhance operations and safety and a perimeter roadway was added for improved security. In addition, the routing of the yard lead, which is the-- are these tracks here, were moved to match the layout that previously came across and went in the south, they now go into the north end of the yard.

Other changes-- other design refinements that are described in the environmental assessment are listed here. The first is that any of the stations we reconfigured the layout within the footprint that the station was already designed to be on, of the roadway, sidewalks, bus bays, to improve access and enhance circulation within the site. So, that was one, and that's-- many of the stations there were just minor changes.

The second one is there are storm water management facilities plus the ponds throughout the corridor to take care of all the drainage from the rail line and the roadways and the-- and those were-- some of those were moved to comply with new regulations, and of course stringent regulations require more ponds. There are also facilities around this traction called

substations, which if you are looking at Page 1 you'll see some beige-ish buildings that are being constructed, those are used to electrify the railroad and-- some of those were relocated as well.

The final thing we did was-- at the end of the line, beyond the 772 station, we reduced the length of the tail tracks, the tracks beyond the end of the station to save costs.

As I mentioned previously, the purpose of the environmental assessment was to document the changes in effects between those described in the Project's final environmental impact statement and the current preliminary engineering design.

In the following slides I will first note areas where there were no changes in effects and then I will review the areas where the effects have changed and discuss proposed changes in mitigation to address those effects.

These areas had no changes in effects from those cited in the final environmental impact statement. We didn't change anything that would change the-- increase or decrease the impacts previously

noted.

In terms of things that did change, changes were found in the following categories. I'll discuss specifically proposed mitigation measures, for those that require it, after I'm done going through this.

The first under land use is the rail line will physically encroach into the outer edge of the runway protection zone of one runway of Dulles Airport. Several options to eliminate this encroachment are presented in the EA.

In terms of property acquisition and displacement, bear with me because the map is-- it's somewhat confusing. There are-- the design requirements result in a need for nine new property acquisitions not previously required. However, seven properties that were required are no longer required. Phase 2 continues to have no residential or business displacements.

In terms of-- oh, excuse me, in terms of the property acquisition, the WMATA General Plan Set, there's copies outside and also available on our website, identify where these properties are located.

They're available for review this evening, they can be reviewed at the Project office at the WMATA offices or you can download them off the website and review them if you're interested.

In terms of other effects, visual and aesthetic conditions: The two changes in impacts, one I discussed earlier was the change in the height and size of the parking garage at Herndon-Monroe. It will make it more visible from certain vantage points. More notably, at Dulles Airport the new Phase 2 design will introduce an aerial structure, including an above-ground station, within the airport property, which will alter the existing views and view sheds for airport users.

In terms of noise and vibration, the aerial alignment goes to a new path through the airport. There's one building in the technical term, one noise sensitive receptor, the Dulles West Office Building which is on the corner of basically Aviation Drive and Cargo Drive, the west end of the office building at the Dulles, is predicted to exceed the FTA noise criteria. There are no changes in the number of vibration

receptors exceeding criteria.

In terms of historic resources, the introduction of the aerial alignment station will have what is known as a Section 106 "Adverse Effect" on the Dulles Airport Historic District. That district is eligible for the National Register of Historic Places and the effect is due to the introduction of new visual elements and disruption of the historic landscaping plan. The new location of the yard lead track will affect one archeological resource.

Water resources, while we've made every attempt to avoid or minimize wetlands impacts, the design refinements would result in an additional .6 acres of wetland impacts. This increased impact is due primarily to the additional areas or different areas where they're disturbed during the construction.

The design changes also result in one less stream crossing than we had in the previous design.

In terms of aquatic and terrestrial habitat, there the site a small displacement of habitat, next to the Route 28 Station entrance that was not affected before because of the location of the station.

Transportation effects, the Phase 2 design refinements may cause changes in airport traffic patterns and tenant access during construction, and this could affect airport users and tenants. Primarily in a construction issue, all roadways involved there will be access during construction, there may be different access, but permanently all accesses would be returned.

The final is Section 4(F) evaluation. Section 4(F) is a portion of the U.S. Department of Transportation law that requires you to evaluate impacts to parklands and in this case cultural resources. The Section 4(F)determination in the EA evaluated effects to two Section 4(F) resources, the Dulles Airport Historic District and one archeological resource, which I discussed previously.

The Section 4(F) findings indicate there was not a feasible improvement alternative to the Phase 2 design proposed in the EA and mitigation to address the impacts is planned.

So, that's a summary of the changes of impacts. Now I'm going to go through and talk about the

proposed changes in the mitigation methods.

First of all, all of the mitigation measures for the project that were required in 2006 as a part of the FTA Amended Record of Decision would still apply to Phase 2. So, we will still do all of that mitigation. However, based on the findings of the environmental assessment, there are some areas where changes to the mitigation measures are recommended.

The first deals with historic resources and Section 4(F) impacts. An updated Section 106 memorandum of agreement is required to address the effects to historic and archeological resources. This agreement, which is currently under review by the Virginia State Historic Preservation Office and other consulting parties, outlines the scope and process for implementing the required mitigation measures for these resources.

A copy of the draft agreement is included in the environmental assessment document and will-- this agreement will also mitigate the Section 4(F) impacts resulting from the design refinements.

Second, as discussed in the EA, mitigation of

for wetland impacts would be satisfied through the process of credits at an approved wetlands mitigation bank within the same watershed. Compensation for stream impacts, likewise will be sought at an approved stream mitigation bank.

To address the new noise impacts at Dulles Airport, the Airports Authority will install appropriate noise mitigation, either trackside (a noise barrier), or acoustic windows at the existing office building. If the future land use at this location changes prior to the start of rail operations, the need for mitigation measured would be re-evaluated.

The updated FAA Record of Decision will address FAA regulatory requirements at Dulles Airport, including mitigation for the rail alignment encroachment into the existing runway protection zone. The Federal Aviation Administration and the Airports Authority will conduct a separate environmental review for the associated runway improvements in determining the most appropriate mitigation measure prior to start of Phase 2 rail operations.

Next steps in the process are-- upcoming

milestones are shown on the screen. I encourage you to review the environmental assessment and materials related to effects on historic resources and provide us with any comments. The comment period goes until June 25th and we'll talk in a moment about ways you can comment. We will do a Public Hearing Report, in August, September timeframe for both the Airports Authority the WMATA board will take actions and following all that the FTA will make a determination under the National Environmental Policy Act.

I thank you very much for your attention during this presentation and I am now going to turn the microphone over to Mrs. Hudgins who will officiate the testimony during the hearing.

MS. HUDGINS: Thank you, Mr. Rohrer.

Written comments may be provided, either to MWAA or WMATA. Please include the WMATA docket number R12-01 and your name and any organization or affiliation, on all comments. Comments must be received by 5:00 p.m. on June 25th, 2012.

Electronic statements can be sent to eacomments, and I'm going to spell it E-A-C-O-M-M-E-N-

T-S at DullesMetro.com (eacomments@DullesMetro.com) or WrittenTestimony@WMATA.com. Alternatively, statements may be mailed to Mr. Karl Rohrer, Deputy Project Director, Phase 2 Dulles Corridor Metrorail Project, 1593 Springhill Road, Suite 300, Vienna, Virginia 22182 or to the Office of the Secretary, WMATA, 600 Fifth Street, NW, Washington, D.C. 20001 or faxed to 202-962-1133.

If you have questions about the different ways to have -- provide testimony, please see Ms. Pena at the registration table.

And now it's time that we begin our comments. And before I begin I'm going to look at the clock and it appears to be about 7:30 that we are beginning the public hearing.

And I will remind you that there is a clock in front of you and you are asked to give your name and your organization that you may be speaking for, if that's the case.

The first speaker is Josh Sawislak. I probably did not pronounce it correctly.

MR. SAWISLAK: Sawislak. We're here.

MS. HUDGINS: Yeah?

MR. SAWISLAK: Good evening. My name is Josh Sawislak and I represent myself as a citizen of the Commonwealth. Tonight I testify in support of the design presented in the EA, known as the Refined LPA.

Specifically I want to stress that in this economic climate, cost savings such as the aerial station concept at Dulles Airport are critical to the success of the project and the ability for the region to recover from this latest economic downturn and to prosper.

From a design of historic resource perspective, I have found that the new alignment and station concept at the airport is both functional for passengers and respectful and complimentary of the historic terminal. The change in travel time for passengers, from the Metrorail station to their airport gate is negligible.

I cannot stress strongly enough, that to spend 100 millions of dollars and possibly as much as half a billion, on a tunnel underground station at the airport is not prudent, necessary nor a good use of

public funds.

Completion of the Dulles Metrorail Project during this Phase 2 is critical to the economic health of the region and whether they believe it or not, or willing to admit it, Phase 2 is critical to the economic survival of Loudoun County.

Thank you for accepting my testimony this evening and I have submitted more extensive written comments for the record.

MS. HUDGINS: Thank you. And let me go back because I -- we noted that there were no officials here before. Are there any elected officials here at this time? Okay.

And I will go to the next speaker, Jeff Fairfield.

MR. FAIRFIELD: Good evening. My name is Jeffrey Fairfield, I'm a resident of Herndon, appearing on behalf of the Ruth and Hal Launders Charitable Trust. The trust has been a longtime supporter of the Dulles Corridor Metrorail Extension Project, going back to the early days of the original scoping period and the (inaudible) process. And so we're very excited

about the imminence of commencement of construction on Phase 2 and this is one of the very last steps in that process.

The namesake of the trust, Hal Launders, was a very early supporter of Dulles Airport, one of the first citizens in Western Fairfax County to realize the economic potential at the airport, and he worked very hard in the latter years of his life to see that it reached its full potential. And so, it has not been inconsistent that the trust has been an active and vocal supporter of the rail connection to the airport.

Personally, I've been involved in promoting Dulles Airport as long as I've been in Western Fairfax. I'm the president of the Committee for Dulles, long time user and advocate for the airport. And so I think that I have some portfolio and credence to speak to impacts, both environmental and historical. And I think in particular the selection of the aerial alternative for the Dulles Terminal Station, the refined architecture for the station, which I observed outside, will strike an appropriate and equitable balance between preserving the architectural and

historical integrity of the airport, and particularly the (inaudible) terminal and also shepherding the limited resources that we have available to make this Phase 2 project a reality in a method that's most consistent with the public interest.

So, I would urge FTA and FAA to approve this environmental assessment refinement, to make the appropriate amendments to the respected Records of Decision and move us one step closer to the day when we can all ride Metrorail to our international airport. Thank you very much.

MS. HUDGINS: Thank you. The next speaker is Mark Bernal (ph). Is Mark here?

UNIDENTIFIED MALE: Mark is here, but Mark will not speak.

MS. HUDGINS: Mark is not speaking. Thank you.

The next is Ed Tennisen (ph).

MR. TENNISEN: I skip.

MS. HUDGINS: Tammy Katrain (ph).

MS. KITAN: I skip.

MS. HUDGINS: Jeff Parnes.

MR. PARNES: I don't.

MS. HUDGINS: Come forward and please -- I remind you the timer is here and please give your name and organization that you are representing.

MR. PARNES: My name is Jeffrey Parnes, I'm a resident of Fairfax County in the unincorporated part of Oak Hill. I represent only myself, although I have other positions. Looking over the environmental impact and assessment paperwork the Route 28 Station, or the "Innovation Station" as we now call it, does not show a bridge connecting over the Dulles Toll Road. Now, I know it's not part of the station, but it would serve the station if it was built and I'm afraid that if, in fact, we have to go through a completely separate EA cycle to include that bridge, at a later date, we will be spending millions of dollars and wasting that, when it could have been incorporated as part of this.

It may not could be built at this time, but it should be considered as part of the EA impact at this time. Thank you.

MS. HUDGINS: Thank you, Mr. Parnes.

Mr. Parnes is the last speaker that is signed

up to speak. Is there anyone else in the audience that would like to have time and testimony? Is there anyone else in the audience?

Yes, sir. Please come forward and give your name and organization that you are representing.

MR. COHN: Good evening. My name is Tim Cohn, I'm a resident of Fairfax County. I generally approve everything they're doing and it program, but I like to just emphasize that pedestrian and bicycle access to these facilities are going to be very important, I think in the future more so, and I just want to make sure that those are accounted for and taken care of in the final plan. Thank you.

MS. HUDGINS: Thank you. Are there any other speakers? Hearing none, since there's no one else to speak tonight, the public hearing is now concluded. And the time is just about 7:40 -- 7:37. Okay, that's it.

Thank you all very much for attending during tonight's presentation and for your comments.

CERTIFICATE OF TRANSCRIBER

I, SUSAN LAPOOH, do hereby certify that this transcript was prepared from audio to the best of my ability.

I am neither counsel nor party to this action nor am I interested in the outcome of this action.

_____
SUSAN LAPOOH
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