

# POTOMAC YARD METRORAIL STATION ENVIRONMENTAL IMPACT STATEMENT



## Public Hearing Staff Report

Draft Environmental Impact Statement  
and General Plans

September 2015



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WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY  
 PUBLIC HEARING STAFF REPORT  
 REVIEW OF PUBLIC HEARING TESTIMONY AND STAFF RECOMMENDATIONS  
 PROPOSED POTOMAC YARD METRORAIL STATION  
 ALEXANDRIA, VIRGINIA

HEARING NO. 604  
 DOCKET NO. R15-01

This report presents the staff analysis of the public hearing held on April 30, 2015, including material submitted for the public hearing record. Included in this report are recommendations from various WMATA staff concerning the Potomac Yard Metrorail Station. Included in this report are the following sections:

1. Background
2. Summary of the Public Hearing
3. Supplemental Correspondence Submitted for the Record
4. Compact Article VI Section 15 - Other Agency Review and Comments
5. Comments Received for the Public Record Annotated with Responses
6. Public Hearing Response Analysis
7. Other Information for the Public Record
8. Staff Recommendation

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## 1 BACKGROUND

### 1.1 Purpose of the Report

The Federal Transit Administration (FTA) and the City of Alexandria, in cooperation with the Washington Metropolitan Area Transit Authority (WMATA or Metro) and the National Park Service (NPS), issued a Draft Environmental Impact Statement (Draft EIS) pursuant to the National Environmental Policy Act (NEPA) for construction of a proposed Potomac Yard Metrorail Station. The Draft EIS was issued and made available for review and comment from April 3 to May 18, 2015, with a public hearing held on April 30, 2015.

The Public Hearing Staff Report documents the public hearing and comment period for the Draft EIS, including the hearing notice and proceedings, comments received at the hearing and in writing, and other public outreach conducted for the comment period. All comments made for the record during the public comment period are documented in the report, and responses are provided. This report was prepared by WMATA pursuant to its Compact agreement and incorporates input from FTA, NPS, and the City of Alexandria. The Public Hearing Staff Report is released for public comment, and comments received will be incorporated in a supplemental report along with the WMATA staff recommendation regarding the proposed project, which is described further below. The Draft EIS comments and responses will also be incorporated in the Final EIS, to be issued by FTA and the City of Alexandria, in cooperation with WMATA and NPS.

### 1.2 Project Description

The proposed Potomac Yard Metrorail Station consists of construction of a new Metrorail station and ancillary facilities located at Potomac Yard within the City of Alexandria along the existing Metrorail Blue and Yellow Lines between the Ronald Reagan Washington National Airport station and the Braddock Road station. **Figure 1-1** shows the project study area in northern Alexandria and southern Arlington County. The project would serve existing neighborhoods and retail centers as well as high-density, transit-oriented development planned by the City of Alexandria. The project would provide access to the regional Metrorail system for the U.S. Route 1 corridor of north Alexandria.

### 1.3 Project History

The concept to build a Metrorail Station at Potomac Yard dates back as far as the Washington metropolitan region's Metrorail system. The 1968 Metrorail Adopted Regional System Plan envisioned a future Metrorail station at Potomac Yard. The area at the time was occupied by the Richmond, Fredericksburg & Potomac (RF&P) Railroad Potomac Yard, and planners deferred construction of the Metrorail station until a later date. The omission of Potomac Yard station resulted in a long gap between Ronald Reagan National Airport Metrorail station in Arlington, Virginia, and Braddock Road Metrorail station in Alexandria, Virginia.

Starting in the late 1980s RF&P began phasing out operations at the rail yard, opening up the opportunity for the site to be redeveloped and renewing interest in construction of a Metrorail station in its vicinity. In 1992, the City of Alexandria completed planning and rezoning for the site and by the late 1990s redevelopment of the former railroad yard commenced, with a shopping center built, followed by residential units, office space, retail, and park space. Today, Potomac Yard continues to see development, with higher-density mixed-use redevelopment under construction or planned for the site.

Since removal of the former rail yard, multiple plans have included construction of a Metrorail station in Potomac Yard to serve new development. A potential Potomac Yard Metrorail Station was included in WMATA's 1999 Transit Service Expansion Plan, the 2010 Financially Constrained Long-Range Transportation Plan for the National Capital Region (CLRP), and earlier WMATA and regional transportation plans. A Metrorail station at Potomac Yard was also included in the City of Alexandria's 1992 and 2008 Transportation Master Plans. The North Potomac Yard Concept Development Study (2010), conducted by the City of Alexandria and Metro, analyzed eight potential Metrorail station locations, recommending further examination of three locations. The North Potomac Yard Small Area Plan was adopted in 2010, which envisions replacement of the existing shopping center with a high-density, transit oriented neighborhood anchored by a Metrorail station.

Currently, the project area is not directly served by a regional transit system, such as Metrorail. This area is served by local bus services that operate in the U.S. Route 1 corridor, including the Crystal City/Potomac Yard Transitway (also known as “Metroway”). Direct access to the Metrorail system will facilitate regional transit trips.

Due to the constrained capacity of the roadway network, additional transportation options are needed to support the City of Alexandria’s redevelopment plans by accommodating travel demand through transit and other non-auto modes. Direct regional transit access would provide more transportation choices for residents and workers and would enhance connections to regional employment and activity centers.

The environmental process began in 2011 by gathering public and agency input on the scope of the EIS, project alternatives to be evaluated, and defining agency roles in the process. In April 2015, the Draft EIS was published for public and agency review and comment. On April 24, 2015 the City of Alexandria published the Staff Recommendation for the Preferred Alternative, which recommended Build Alternative B for the construction of a new station. On May 20, 2015 the City of Alexandria City Council voted unanimously in selecting Build Alternative B as the Preferred Alternative.

## 1.4 Draft Environmental Impact Statement and General Plans

As part of the project approval process, the Draft EIS was prepared to provide the public, local governments, and environmental agencies with a description of the potential effects of the proposed Potomac Yard Metrorail Station.

The purpose of the Draft EIS is to assist decision-makers in the assessment of impacts associated with constructing and operating the Potomac Yard Station. The Draft EIS examined the impacts of various station alternatives (including building no station, i.e., the “No Build Alternative”). The document addresses the expected environmental and transportation impacts of the project, and outlined potential mitigation measures. The Project Team developed General Plans of each alternative’s location and proposed design to accompany the Draft EIS.

WMATA’s Compact requires that the Board of Directors, in amending the mass transit plan, consider current and prospective conditions in WMATA’s service area, or transit zone, should the project be built. The transit zone includes the City of Alexandria and considerations include, without limitation, land use, population, economic factors affecting development plans, existing and proposed transportation and transit facilities, any dislocation of families or businesses, preservation of the beauty and dignity of the Nation’s Capital, factors affecting environmental amenities and aesthetics, and financial resources.

### 1.4.1 Alternatives Considered

The Draft EIS evaluated three Build Alternatives and one design option that meet the project’s purpose and need. The Draft EIS included a No Build Alternative, which describes what would happen if no station was built and provides a baseline to compare impacts. The **No Build Alternative** includes planned transportation projects expected to be finished by 2040, except the Potomac Yard Metrorail Station. The Build Alternatives are described below, shown on **Figure 1-2** and summarized in **Table 1-1**.

- **Build Alternative A** is located along the existing Metrorail tracks between the CSX Transportation (CSXT) railroad tracks and the north end of the Potomac Greens neighborhood, generally within the “Metrorail Reservation” identified as part of the Potomac Yard/Potomac Greens Small Area Plan (1999). Two construction access options for Build Alternative A were assessed in the Draft EIS:
  - *Option 1* – access to construction staging areas from the George Washington Memorial Parkway, Potomac Greens Drive, and the Rail Park, with relatively limited construction access from Potomac Yard.
  - *Option 2* – access to construction staging areas from Potomac Greens Drive and the Rail Park, with relatively limited construction access from Potomac Yard, and no access from the George Washington Memorial Parkway.

- **Build Alternative B** is located between the George Washington Memorial Parkway and the CSXT railroad tracks north of the Potomac Greens neighborhood, and east of the existing Potomac Yard Shopping Center. Portions of Build Alternative B would be located within the Greens Scenic Area, a NPS-administered easement located within the City's Potomac Greens Park. Two construction access options for Build Alternative B were assessed in the Draft EIS:
  - *Option 1* – access to construction staging areas from the George Washington Memorial Parkway, Potomac Greens Drive, and the Rail Park, with relatively limited construction access from Potomac Yard.
  - *Option 2* – access to construction staging areas from Potomac Greens Drive and the Rail Park, with relatively limited construction access from Potomac Yard, and no access from the George Washington Memorial Parkway.
- **B-CSX Design Option** is located east of the existing Potomac Yard movie theater on land currently occupied by the CSXT railroad tracks. This design option of Alternative B would require relocation of the CSXT tracks to the west, providing the room necessary for the station and realigned Metrorail track to avoid George Washington Memorial Parkway property and the Greens Scenic Area easement.
- **Build Alternative D** is located west of the CSXT railroad tracks near the existing Potomac Yard Shopping Center. The alternative would require elevated tracks starting north of Four Mile Run, crossing over the CSXT tracks into Potomac Yard, and then crossing over the CSXT tracks again to reconnect to the existing Metrorail line behind Potomac Greens.

Table 1-1: Build Alternatives Characteristics

Alternative	Grade and Layout of Station	Track Work	Facilities for Station Access	Additional Structures Required
Build Alternative A	At-grade, side platforms	Minimal track work	Two pedestrian bridges over CSXT right-of-way; access to Potomac Greens via walkway	None
Build Alternative B	At-grade, side platforms	Moderate track work	Two pedestrian bridges over CSXT right-of-way; access to Potomac Greens via walkway	Structures (retaining wall) to support new track and station
B-CSX Design Option	At-grade, side platforms	Major track work, including realignment of CSXT tracks	Two pedestrian bridges over CSXT right-of-way	None
Build Alternative D	Aerial, center platform	Major track work	None	Two aerial structures over CSXT right-of-way, one Metrorail bridge over Four Mile Run, aerial track and supports, and retaining wall replacement on the east and west sides of the tracks north of the existing Metrorail portal. New structures would pass over the existing Metrorail tracks, which would be removed following construction

Figure 1-1: Potomac Yard Draft EIS Study Area

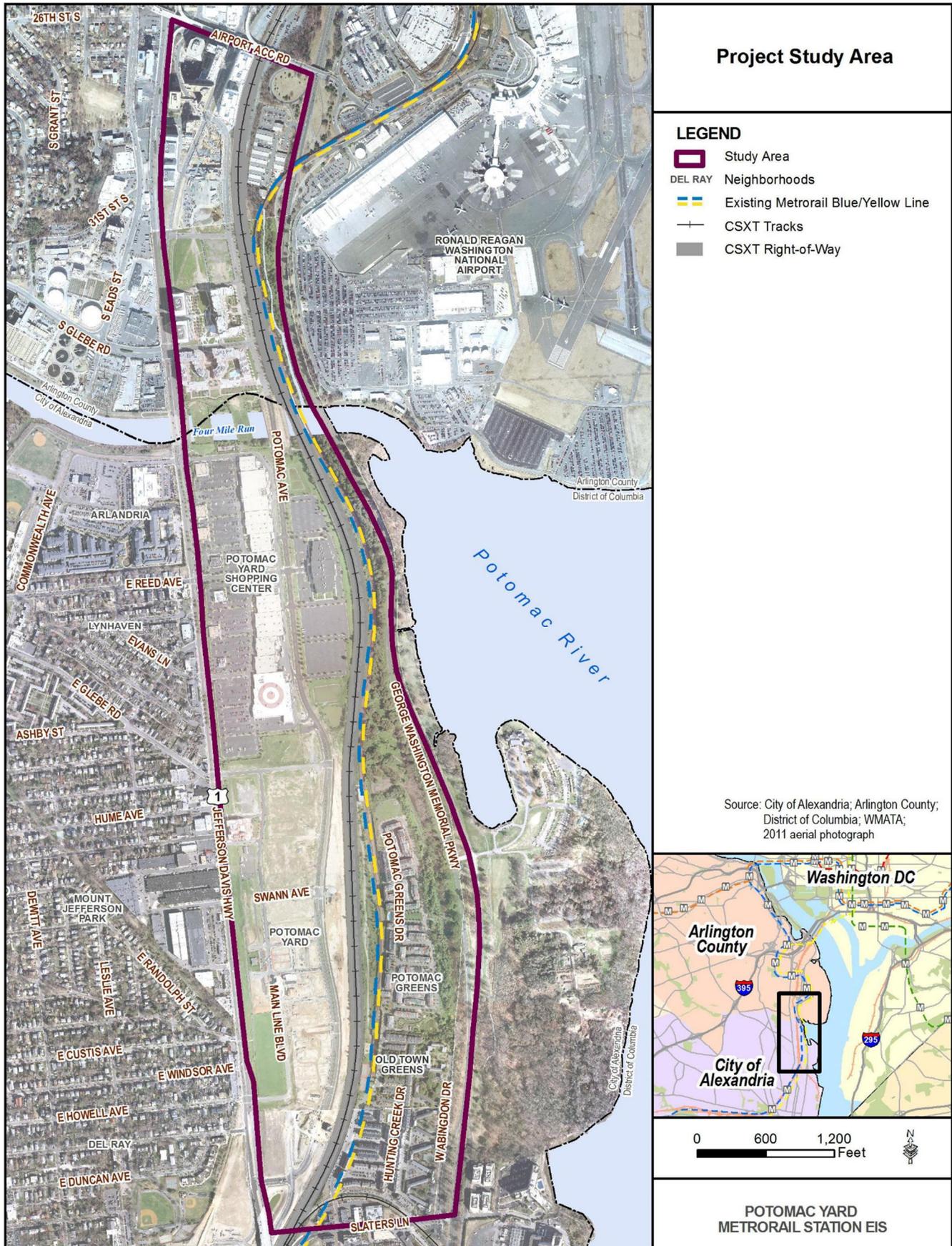
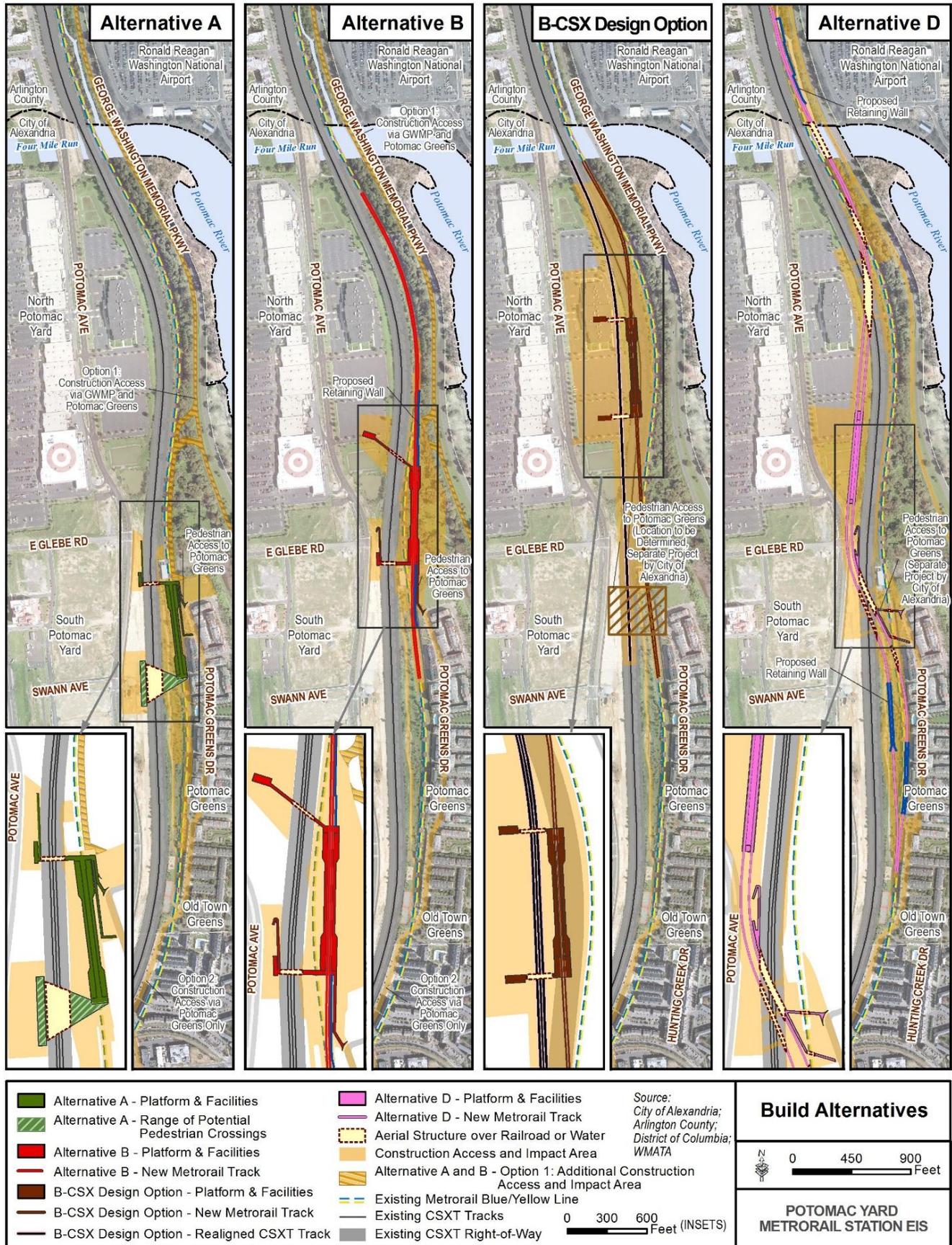


Figure 1-2: Proposed Alternatives for Potomac Yard Station



## 1.5 Notice of Public Hearing

Public hearing notices were published in the Washington Post, the Washington Hispanic, and El Tiempo newspapers between March 30, 2015, and April 20, 2015, as summarized in **Table 1-2**. Public notices were posted at WMATA's Braddock Road Metrorail station, King Street Metrorail station, and elsewhere. Details of the public hearing and comment period were also available on WMATA's website (see **Appendix A** for the Notice of Public Hearing).

The Draft EIS, General Plans, and public hearing notices are available online at [www.potomacyardmetro.com](http://www.potomacyardmetro.com) and [www.wmata.com/hearings](http://www.wmata.com/hearings). These documents were also made available for inspection during normal business hours at the following locations starting Monday, March 30, 2015:

Office of the Secretary  
600 Fifth Street, NW, Room 2D-209  
Washington, DC 20001  
202-962-2511

Charles E. Beatley, Jr. Central Library  
5005 Duke Street  
Alexandria, VA 22304  
703-746-1702

Alexandria City Hall  
Office of City Clerk  
301 King Street, Room 2300  
Alexandria, VA 22314  
703-746-4550

Cora Kelly Recreation Center  
25 West Reed Avenue  
Alexandria, VA 22305  
703-746-5554

James M. Duncan Branch Library  
2501 Commonwealth Avenue  
Alexandria, VA 22301  
703-746-1705

Aurora Hills Branch Library  
735 18th Street, South  
Arlington, VA 22202  
703-228-5715

The Project Team accepted written comments for a period of 46 days, from April 3, 2015, until 5:00 p.m. on May 18, 2015. These comments and the Project Team's detailed responses are presented in **Section 5** of this document.

**Table 1-2: Public Hearing Notices and Outreach**

Item	Activity	Location	Date
<b>Public Hearing Notice</b> (English)	Published	Public Hearing notice printed in the Washington Post	March 30 and April 6, 2015
<b>Public Hearing Notice</b> (Spanish)	Published	Public Hearing notice printed in the Washington Hispanic	Week of April 20, 2015
<b>Public Hearing Notice</b> (Spanish)	Published	Public Hearing notice printed in El Tiempo	Week of April 20, 2015
<b>Notice of Public Hearing Flyer</b> (English and Spanish)	Hand delivered (door hanger)	Adjacent residential properties	April 15, 2015
<b>Notice of Public Hearing Flyer</b> (English and Spanish)	Mailed	Letters to property owners within the project sites of the Build Alternatives	April 22, 2015
<b>Public Hearing Notice Email</b> (English)	Email	Emails to project distribution list	March 30, April 27, and April 30, 2015
<b>Project Website</b> (English and Spanish)	Website	Notice information published on <a href="http://www.potomacyardmetro.com">http://www.potomacyardmetro.com</a>	March 30, 2015
<b>City of Alexandria Website</b> (English)	Website	Notice information published on <a href="http://www.alexandriava.gov/potomacyard">http://www.alexandriava.gov/potomacyard</a>	March 30, 2015

## 2 SUMMARY OF PUBLIC HEARING

The public hearing for the project was held on April 30, 2015, at Cora Kelly Recreation Center, 25 West Reed Avenue, in Alexandria, Virginia. The public hearing was conducted in compliance with WMATA's Compact policies and NEPA (40 CFR 1506.6).

Before the public hearing, an informal open house was held from 6:30 p.m. to 7:00 p.m.

### 2.1 Public Hearing Format

The public hearing was chaired by William D. Euille, Mayor, City of Alexandria. Mayor Euille convened the hearing at 7:00 p.m. (see **Appendix E** for the Public Hearing transcript). Mayor Euille made the opening statement, explaining that the hearing was convened to solicit public comments on the Draft EIS and General Plans for the project. He noted that the City of Alexandria would be hosting a public hearing on May 16, 2015, as part of its separate legislative process for the project.

Mayor Euille explained that the hearing would begin with a staff presentation, followed by statements from public officials (5 minutes each) and others who had signed up to speak (3 minutes each). He indicated that the City of Alexandria would be videotaping the public meeting, and would post the video on the city website (found here: [http://alexandria.granicus.com/MediaPlayer.php?view\\_id=29&clip\\_id=3108](http://alexandria.granicus.com/MediaPlayer.php?view_id=29&clip_id=3108)). He said that those who wanted to provide comment but not be recorded could see Denise Peña from WMATA, who could explain different options available to provide comment.

Mayor Euille said that written testimony could be submitted to WMATA via the following methods:

- Email to [writtentestimony@wmata.com](mailto:writtentestimony@wmata.com) or [comments@potomacyardmetro.com](mailto:comments@potomacyardmetro.com)
- Fax to 202-962-1133
- Mail to one of the following addresses:
  - Office of the Secretary, Washington Metropolitan Area Transit Authority, 600 Fifth Street, NW, Washington DC 20001
  - Potomac Yard Metrorail Station EIS, PO Box 16531, Alexandria, Virginia 22302

Following this introduction, the WMATA staff presentation was given by Mr. Jim Ashe of WMATA. The staff presentation is summarized in **Section 2.4** of this report.

### 2.2 Public Hearing Materials Provided

The background and supporting documentation available for the public to review at the hearing included the following:

- Volumes I and II of the Draft EIS and General Plans (made available as display copies for review during the open house and hearing)
- Draft EIS Executive Summary (**Appendix B**)
- WMATA Public Hearing Feedback Form (see **Figure 6.1**)
- Open house display boards (detailed in Section 2.2, available in **Appendix C**)
- Materials translated into Spanish:
  - Handout copies of open house presentation slides (**Appendix B**)
  - Handout copies of open house display boards (**Appendix B**)
- List of Public Hearing Recipients (**Appendix A**)

### 2.3 Summary of Open House

At the entrance to the Cora Kelly Recreation Center gymnasium, WMATA employees staffed a welcome table to distribute materials for the public hearing and answer questions from the public. Display boards on the environmental review process, Potomac Yard history, an overview of alternatives, environmental resources, and potential project effects were displayed at the open house. Project Team members were available to explain the alternatives under consideration, findings of the environmental review process,

concept engineering plans, and proposed property acquisitions. The display boards were made available during the formal public hearing proceedings so that the public could continue to review the information presented (see **Appendix C** for the Open House Display Boards).

## 2.4 Summary of Staff Presentation

Mr. Ashe began the presentation by providing an overview of the proposed action and the purpose and need of the project. The proposed action consists of the construction of a new Metrorail station at Potomac Yard along the Metrorail Blue and Yellow Lines. Construction would include a new Metrorail station, associated track improvements, and one or more pedestrian bridges. The purpose of the project is to improve local and regional transit accessibility to and from the Potomac Yard area adjacent to the U.S. Route 1 corridor for current and future residents, employees, and businesses. The project area is currently not served by direct access to regional transit services. Direct access to Metrorail will facilitate regional transit trips. Additional transportation options are needed to support the City of Alexandria's redevelopment plans and the constrained roadway network.

Mr. Ashe then provided an overview of the environmental resources analyzed in the Draft EIS. During project scoping, environmental considerations were addressed in regards to more than 35 alternatives. After initial review and screening, the Draft EIS evaluated a No-Build Alternative and three Build Alternatives, identified as Build Alternative A, Build Alternative B, and Build Alternative D, and a design option of Build Alternative B identified as B-CSX Design Option.

- **No Build Alternative:** The No Build Alternative includes all planned transportation projects expected to be finished by 2040, except the Metrorail station. The impacts from the No Build Alternative consists of not improving regional transit access, being inconsistent with City of Alexandria and regional transportation plans, not addressing existing noise impacts due to existing rail corridor, and development-related traffic and visual impacts.
- **Build Alternative A**
  - Located along the existing Metrorail tracks between the CSX Transportation (CSXT) railroad tracks and the north end of the Potomac Greens neighborhood.
  - Mostly within the "Metrorail Reservation" identified as part of the Potomac Yard/Potomac Greens Small Area Plan (1999).
  - Conceptual Capital Costs: \$119-228 million (in 2016\$)
  - Two options for construction access are considered in the Draft EIS:
    - Option 1 includes construction access from Potomac Greens Drive, Potomac Avenue, and the George Washington Memorial Parkway.
    - Option 2 would include construction access from Potomac Greens Drive and Potomac Avenue only, with no access from the Parkway.
- **Build Alternative B**
  - Located between the George Washington Memorial Parkway and the CSXT railroad tracks north of the Potomac Greens neighborhood, and east of the existing Potomac Yard Shopping Center.
  - Would require land from the George Washington Memorial Parkway and Greens Scenic Area Easement.
  - Conceptual Capital Costs: \$149-293 million (in 2016\$)
  - Two options for construction access are considered in the Draft EIS:
    - Option 1 includes construction access from Potomac Greens Drive, Potomac Avenue, and the George Washington Memorial Parkway.
    - Option 2 would include construction access from Potomac Greens Drive and Potomac Avenue only, with no access from the Parkway.
- **B-CSX Design Option**
  - Design option of Alternative B located east of the existing movie theater on land currently occupied by the CSXT tracks.
  - Requires relocation of the CSXT tracks to the west.

- Station and realigned Metrorail track avoid George Washington Memorial Parkway property and the Greens Scenic Area easement.
- Conceptual Capital Costs: \$193-358 million (in 2016\$)
- **Build Alternative D**
  - Located west of the CSXT railroad tracks near the existing Potomac Yard Shopping Center.
  - Requires elevated tracks crossing over the CSXT tracks into Potomac Yard.
  - Conceptual Capital Costs: \$277-539 million (in 2016\$)

The Build Alternatives would have permanent impacts to key environmental resource areas such as land acquisitions and displacements, local plans and zoning, parklands, visual resources, cultural resources, noise and vibration, wetlands and waterways, and floodplains. Construction of the Build Alternatives would have temporary impacts to resources including adjacent neighborhoods, parklands, George Washington Memorial Parkway roadway, Green Scenic Area easement, visual resources, cultural resources, noise and vibration, wetlands and waterways, floodplains, and resource protection areas.

Mr. Ashe provided a review of the project's capital funding sources, which will be managed by the City of Alexandria. The City will fund the station using revenue generated by new development in Potomac Yard. The project has been approved for a \$50 million loan through the Virginia Transportation Infrastructure Bank. The City will continue to pursue other regional, state, and federal sources.

Mr. Ashe provided information about the project's compliance with Section 106 of the National Historic Preservation Act. The project team has identified the Area of Potential Effects and the consulting parties, and developed a preliminary assessment of effects. FTA anticipates sending a formal determination of effects to the State Historic Preservation Office in the near future. A Section 106 Memorandum of Agreement to minimize and mitigate adverse effects would likely follow.

Mr. Ashe noted that the public hearing comment period would remain open until May 18, 2015, and that the public hearing staff report would be prepared and circulated for a 10-day public comment period. A Public Hearing Staff Report Supplement will be prepared to include the staff recommendation. Following the public hearing, the City of Alexandria will select a Preferred Alternative as part of its separate legislative process.

A copy of the staff presentation is provided in **Appendix D**.

## 2.5 Individuals Providing Testimony

**Table 2-1** lists the individuals who provided oral testimony at the April 30, 2015 public hearing.

**Table 2-1: Individuals Providing Testimony at the WMATA Public Hearing**

Name	Affiliation
Jack Summe	-
Brian Jungwirth	Virginia Railway Express (VRE)
Dino Drudi	-
Aimee Custis	Coalition for Smarter Growth
Mark Goode	-
Poul Hertel	-
Robert Whitfield	Fairfax Taxpayers Alliance
Mark Anderson	-
Katy Cannady	-
David Fromm	-
Steven Teslik	-
Jerry Foley	-
Dave Cavanaugh	-
Philip Hocker	-
David Dunn	-
Arianna Sekulow	-
Walter Clarke	Alexandria Chamber of Commerce
John Schrader	-
Susan Coad	-
Scott Eisele	-
James Melton	-
Betty King	-
Andrea Fitch	-
Tim Roseboom	Virginia Department of Rail and Public Transportation (DRPT)

## 2.6 Conclusion of Hearing

Mayor Euille noted that additional comments could be submitted by:

- Email to [writtentestimony@wmata.com](mailto:writtentestimony@wmata.com) or [comments@potomacyardmetro.com](mailto:comments@potomacyardmetro.com)
- Mail to one of the following addresses:
  - Office of the Secretary, Washington Metropolitan Area Transit Authority, 600 Fifth Street, NW, Washington DC 20001
  - Potomac Yard Metrorail Station EIS, PO Box 16531, Alexandria, Virginia 22302

Mayor Euille stated that all comments must be received by 5:00 p.m., May 18, 2015. Mayor Euille adjourned the hearing at 8:30 p.m.

### 3 SUPPLEMENTAL CORRESPONDENCE SUBMITTED FOR THE RECORD

**Table 3-1** and **Table 3-2** lists individuals who submitted written correspondence for the record through comment cards at the public hearing or by email. Comments were accepted through postal mail or fax; however, no comments were received through those methods.

The Project Team accepted written comments for a period of 46 days from April 3, 2015 until 5 p.m. on May 18, 2015. Comments and the Project Team's detailed responses are provided in **Section 6**.

**Appendix F** provides the supplemental correspondence received. Supplemental correspondence includes comments cards at the public hearing or by email.

**Table 3-1: Comment Cards Submitted at WMATA Public Hearing**

Name	Affiliation
David Adams	-
Michelle Adams	-
Al Attiliis	-
Kevin Beekman	-
Walter Clarke	Alexandria Chamber of Commerce
Susan Coad	-
Jerry Foley	-
Camille Galdes	-
Ann Marie Grills	-
Poul Hertel	-
Poul Hertel / Connie Graham	-
Richard Mainzer	-
Tim Roseboom	-
John Roy	-
Raquel Sumaray	-
Jack Summe	-
Ben Sylla	-
Anonymous (23 cards)	-

**Table 3-2: Comments Received by Email**

Name	Affiliation
Asha	-
Benjamin Aiken	-
Emily Allen	-
Alli Baird	Virginia Department of Conservation and Recreation
Scott Bartos	-
Patrick and Jocilyn Bergin	-
Paul Bickmore	-
Betsy Biffel	-
Andrea Burke	Virginia Department of Historic Resources (DHR)
Daniel Burstein	Virginia Department of Environmental Quality (DEQ), Northern Virginia Office

Name	Affiliation
Craig Caldwell	Amtrak
Ann Carol	-
Dave Cavanaugh	-
Jeremiah Christopher	-
Steve Coe, DLPR Review Coordinator	Virginia Department of Environmental Quality
Jeff Cohen	-
Randy Cole	-
John C. Cook	Virginia Railway Express (VRE)
Troy Creasy	CSXT
Timothy E Curley	-
Nicole Downing	-
David Dunn	-
Patrick Durbin	-
Jim Durham	Alexandria Bicycle and Pedestrian Advisory Committee (BPAC)
Christopher Egghart	Virginia Department of Environmental Quality
Brook & Scott Eisele	-
Carol Eisenmann	-
Greg Evans	Virginia Department of Forestry
Tim and Anne-Marie Fennell	-
Zach Ferguson	-
Van Van Fleet	-
Kurt Flynn	-
Lisa Fues	-
Larry Gavan	Virginia Department of Environmental Quality
Mark Goode	-
Vince Griffin	-
Seth Heald	-
Poul Hertel / Connie Graham	-
Philip Hocker	-
Jacob J. Hoogland	-
Christine Hopkins	-
Peter Hubbard	-
Amy Inman	Virginia Department of Rail and Public Transportation
Reubon Juster	-
Carol Kalinoski	-
David Kaplan	-
S. Robert Kaufman	-
Rick Keller, Chair	Sierra Club - Virginia Chapter, Mt. Vernon Group
Lucy Kempf	National Capital Planning Commission
Mary L. Kendall, President	Old Town Greens Townhouse Owners Association
Jerry King	-
Jonathan Krall	-

Name	Affiliation
Nona Kusuma	-
Jeff Larrimore	-
Cheryl Audet Lavoie	-
Justin Marks	-
Julie Matter	-
Corey & Marsha McDaniel	-
Kory & Diana Mertz	-
Kotur Narasimhan	Virginia Department of Environmental Quality, Office of Air Data Analysis
Todd Neison	-
Kim Neison	-
Barbara Rudnick	U.S. Environmental Protection Agency
Alan Page	-
Kathryn Papp	-
Glenda Parker	-
Laura Plaza	-
Kevin H. Posey	Global Sustainable Transportation Advocacy Alexandria
Jill Ralph and Nate Weisshaar	-
John Ray	-
William Rogers	-
Roberta Ruhr	Virginia Department of Conservation and Recreation, Division of Natural Heritage (OCR)
Mary Rust	-
Harry Samuels	Virginia Department of Health, Office of Drinking Water
Jol A. Silversmith	-
Natalia Smishko	-
Terrance Staley II and Ann Herlin	-
Bettina Sullivan	Virginia Department of Environmental Quality
Brad Todd	-
Mark Van Tassel	-
Leon Vignes	Arlington County Department of Community Planning, Housing and Development Planning Division
Catherine Voorhees	-
Harriet A. Welch	-
Norman Whitaker	Virginia Department of Transportation - Northern Virginia District
Molly Williams Pugh	-
Richard Webber	-
John Woodmaska	-
Timothy Yuskavage	-

## 4 COMPACT ARTICLE VI, SECTION 15 – OTHER AGENCY REVIEW AND COMMENTS

### 4.1 Agency Correspondence

In advance of the public hearing, the project team contacted relevant local, state and federal agencies to announce the Draft EIS was available to review, solicit input on the Draft EIS, and to identify any potential areas of concern under the agency's jurisdiction. Agencies to which the Draft EIS was circulated are listed in **Table 4-1**. Agency correspondence is included in **Appendix F**.

**Table 4-1: Agencies Receiving Copies of the Draft EIS**

Agency	Type	Date of Agency Response
Federal Aviation Administration	Federal	-
Federal Highway Administration	Federal	-
Federal Railroad Administration	Federal	-
Federal Transit Administration	Federal	Lead Federal Agency
National Capital Planning Commission	Federal	May 18, 2015
National Park Service	Federal	Cooperating Agency
U.S. Army Corps of Engineers	Federal	-
U.S. Department of Defense	Federal	-
U.S. Department of Homeland Security	Federal	-
U.S. Environmental Protection Agency	Federal	May 18, 2015
U.S. Fish and Wildlife Service	Federal	-
Commonwealth Transportation Board	State	-
District of Columbia Department of Transportation	State	-
Maryland Department of Transportation	State	-
Maryland Transit Administration	State	-
Virginia Department of Agriculture and Consumer Services	State	-
Virginia Department of Conservation and Recreation	State	May 8, 2015
Virginia Department of Environmental Quality	State	May 15, 2015
Virginia Department of Forestry	State	May 15, 2015
Virginia Department of Game and Inland Fisheries	State	-
Virginia Department of Health	State	May 15, 2015
Virginia Department of Historic Resources	State	May 18, 2015
Virginia Department of Rail and Public Transportation	State	May 15, 2018
Virginia Department of Transportation	State	May 15, 2015
Virginia Marine Resources Commission	State	-
Virginia Railway Express	State	May 15, 2015
Arlington County	Local	May 18, 2015
City of Alexandria	Local	Lead Local Agency
Metropolitan Washington Airports Authority	Local	-
Metropolitan Washington Council of Governments	Local	-
Northern Virginia Regional Commission	Local	-
Northern Virginia Transportation Authority	Local	-
Northern Virginia Transportation Commission	Local	-
Potomac Rappahannock Transportation Commission	Local	-

## 4.2 City of Alexandria Outreach

In addition to project activities, the City of Alexandria conducted an extensive public outreach process on the Draft EIS and City of Alexandria Staff Report. The City of Alexandria maintained the Potomac Yard Development website (<http://www.alexandriava.gov/potomacyard>), which included a section on the proposed Potomac Yard Metrorail Station. The website provides responses to frequently asked questions, announcements, meeting dates, project information, access to key reports and documents, and a link to provide comments via the project website.

See **Table 4-2** summarizes City of Alexandria public outreach events. The City of Alexandria submitted written public comments received at these events into the record of testimony for this report.

**Table 4-2: City of Alexandria Outreach Events**

Event	Location	Date
Community Open House #1 – Land Use & Hazardous Materials	City Hall Council Workroom	March 31, 2015
Community Open House #2 – Wetlands, Greens Scenic Area Easement, City Parkland, National Park Service Land, Visual Resources & Cultural Resources	Charles Houston Recreation Center	April 8, 2015
Community Open House #3 – Transportation, Noise, Vibration, Construction Access & Secondary/Cumulative Impacts	Cora Kelly Recreation Center	April 13, 2015

## 4.3 City of Alexandria Board/Commission Review and Legislative Process

The City of Alexandria held several board and commission meetings as part of the City's legislative process in preparation for the selection of a Preferred Alternative. With the exception of the Board of Architectural Review, these meetings were held after the April 30, 2015 WMATA and NEPA Public Hearing (see **Table 4-3**).

The City of Alexandria City Council held a public hearing regarding the selection of a Preferred Alternative on May 16, 2015, at Alexandria City Hall. Nineteen individuals testified at the hearing (see **Table 4-4**), and ten provided comment cards (see **Table 4-5**). On May 20, 2015, the City of Alexandria City Council held a special meeting to adopt a Preferred Alternative. The City Council selected Build Alternative B as the Preferred Alternative under Resolution No. 2676 (see **Appendix H**). The City of Alexandria submitted to the project the comments received during its outreach effort. These comments are included in this public hearing report.

**Table 4-3: City of Alexandria Board and Commission Meetings**

Event	Location	Date
Board of Architecture Review – Old and Historic Alexandria District	City Hall Council Chambers	April 29, 2015
Environmental Policy Commission	Virginia Tech Alexandria Campus 1021 Prince Street, 3 <sup>rd</sup> Floor Conference Room	May 4, 2015
Planning Commission	City Hall Council Chambers	May 5, 2015
Park and Recreation Commission	Lee Center 1108 Jefferson Street	May 7, 2015
Transportation Commission	City Hall Council Chambers	May 11, 2015
Potomac Yard Metrorail Station Implementation Work Group	City Hall Council Chambers	May 13, 2015
City Council Public Hearing	City Hall Council Chambers	May 16, 2015
City Council Special Meeting	City Hall Council Chambers	May 20, 2015

**Table 4-4: Individuals Providing Testimony at City of Alexandria Public Hearing**

Name	Affiliation
Adam Bramwell	-
Katy Cannady	-
Tonya Colbert	-
Austin Cusack	-
David Dixon	Mount Vernon Group of the Sierra Club
Anthony Estricko	-
David Fromm	-
Robert Gireaux	Potomac Yard Special Tax District Committee for Tax Fairness
Patricia Harris	-
Poul Hertel	-
Jennifer Hovice	-
Richard LaFace	-
Vicky Lessa	-
Rafael Lima	-
Adrienne Lopez	
Steve Malone	Environmental Policy Commission of the Potomac Yard Metrorail Station Implementation Workgroup
Dino Drudi	-
Jack Sullivan	-
Van Van Fleet	Old Town Civic Association
Cindy Zshu	-

**Table 4-5: Individuals who Submitted Comment Cards at City of Alexandria Public Hearing**

Name	Affiliation
Dino Drudi	-
Sally Ann Greer	-
Mary Mertz	-
Peter Prahar	-
Richard Sampson	-
Anonymous (6 Anonymous comment cards)	-

#### 4.3.1 Commission, Board, Department, and Government Agency Correspondence from City of Alexandria Government

Correspondence related to the Draft EIS was received directly from the following commissions, boards, departments and agencies of the City of Alexandria during the public comment period:

- City of Alexandria Beautification Commission, May 14, 2015

These agency comments can be found in **Appendix F**.

## 5 COMMENTS SUBMITTED FOR THE PUBLIC RECORD ANNOTATED WITH RESPONSES

This section is organized as follows:

- 5.1 Background on Comments and Responses – describes how comments were received and tabulated and lists the number of comments received by topic;
- 5.2 Summarized Comments and Responses - summarizes comments received and provides responses by topic area;
- 5.3 Outline of Detailed Comments and Responses – lists the page numbers for each topic area under which detailed comments and responses are grouped;
- 5.4 Index of Responses – indicates for each individual commenter, the sub-topics under which they can find their comments and the responses provided; and
- 5.5 Comments and Responses – provides the detailed comments received and provides responses by topic area.

### 5.1 Background on Comments and Responses

The Potomac Yard Draft EIS received 160 comment submissions during the comment period that ended on May 18, 2015. Comments were submitted by public entities (including the federal government, state government, local government, and public agencies), community organizations / non-profits, and individuals. Some submissions included separate comments by multiple parties, such as different agencies within state government, and these comments are separated in this report. The project team received correspondence electronically through email, by comment card, and by testimony during public hearings. The following section presents comments and responses grouped by comment topic and sub-topic.

Each comment was given a unique identification (ID) number ranging from 10 to 250 and can be found in Section 5.5 of this report. Comments are further subdivided into excerpts based on the topic and sub-topic they address; each passage within a particular comment is assigned a unique ID code. These unique comment excerpt IDs allow the user to identify the source, topic, sub-topic, and sequence of all comment passages presented in this chapter.

A unique passage ID is composed of six numbers in the following format: **X-X-XX-X-XXX, X**

- **X-X-XX-X-XXX, X**: The first digit denotes whether a comment passage originated from an individual (1), local government (2), federal government (3), state government or agency (4), business (5), or community group / non-profit organization (6).
- **X-X-XX-X-XXX, X**: The second digit represents the comment passage's master topic. Passages are labeled by the specific Alternative to which they refer.
- **X-X-XX-X-XXX, X**: The third set of digits represent the sub-topic of the passage (i.e., crime, traffic, noise)
- **X-X-XX-X-XXX, X**: the fourth set of digits refer to the method of transmission for the comment (i.e., public testimony, email)
- **X-X-XX-X-XXX, X**: The fifth set of digits refers to the unique comment ID. If multiple passages are taken from one piece of testimony, they will all share the same comment ID. This portion of the unique ID can be used to determine the name and affiliation of the commenter.
- **X-X-XX-X-XXX, X**: The final digit is used to distinguish any separate comment passages that otherwise share the same unique ID.

**Table 5-1** provides a summary of the number and percent of comments by topic out of the 160 comments received. A number of comments focused on Support for Build Alternative B, Financial Resources, Vehicle Traffic, Construction Impact, Taxes, and Bicycle Access.

Copies of all original comments submitted, without annotations, are included in **Appendix F**.

Finally, each comment response is assigned a unique ID. This ID can be found at the end of each response in parenthesis.

**Table 5-1: Comments by Topic**

Topic	Number of Comments	% of Comments
Support Build Alternative B	48	30.0%
Financial Resources	21	13.1%
Vehicle Traffic	20	12.5%
Construction Impact	19	11.9%
Taxes	19	11.9%
Bicycle Access	16	10.0%
Support General	14	8.8%
Potomac Greens Neighborhood	13	8.1%
Support B-CSX Design Option	13	8.1%
Support Build Alternative A	13	8.1%
Support No Build	13	8.1%
Wetlands / Waters of the U.S.	13	8.1%
Metroway and Other Bus Service	11	6.9%
GW Parkway Aesthetics	9	5.6%
Land Use Impacts	9	5.6%
NPS Land Impacts	9	5.6%
NEPA Process and Methodology	8	5.0%
Other (as a topic)	8	5.0%
Blue and Yellow Line	7	4.4%
Cultural Resources	7	4.4%
Noise	7	4.4%
Amtrak, VRE and CSX Impacts	6	3.8%
Flooding and Stormwater Management	5	3.1%
Pedestrian Access	5	3.1%
Shopping Center	5	3.1%
Safety and Security	4	2.5%
Parking	4	2.5%
Public Involvement	4	2.5%
Station Necessity	4	2.5%
Support Build Alternative A or Build Alternative B	4	2.5%
Other topic areas	41	25.6%

## 5.2 Summarized Comments and Responses

This section provides a summary of the comments received by topic area. The section is organized alphabetically by alternative (master topic) and sub-topics:

- Comments or portions of comments that addressed a specific alternative are grouped under that alternative (e.g., Build Alternative A) and then by sub-topic (e.g., City Park Impacts); and
- Comments or portions of comments that addressed the project in general are grouped under “General Comment” by sub-topic (e.g., “Air Pollution”).

Some of the sub-topic comment summaries are divided further by specific issues. Responses are provided for the comment summaries. Section 5.5 contains the complete comment excerpts with the responses.

Comments or portions of comments concerning issues not substantive to the project or to the Draft EIS are excluded from the summaries in this section; however, they are included in the full list of detailed comments in Section 5.5.

The following outline lists the page numbers where specific topics are summarized.

<a href="#">5.2.1</a>	<a href="#">Build Alternative A</a> .....	25
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	<a href="#">5.2.1.2</a> <a href="#">Build Alternative A Financial Resources</a> .....	25
	<a href="#">5.2.1.3</a> <a href="#">Build Alternative A, GW Parkway Aesthetics</a> .....	25
	<a href="#">5.2.1.4</a> <a href="#">Build Alternative A, GW Parkway Environmental Mitigation</a> .....	26
	<a href="#">5.2.1.5</a> <a href="#">Build Alternative A Land Use Impacts</a> .....	26
	<a href="#">5.2.1.6</a> <a href="#">Build Alternative A Noise Impacts</a> .....	26
	<a href="#">5.2.1.7</a> <a href="#">Build Alternative A Planning and Zoning Consistency</a> .....	26
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	<a href="#">5.2.1.10</a> <a href="#">Support Build Alternative A</a> .....	27
<a href="#">5.2.2</a>	<a href="#">Build Alternative B</a> .....	28
	<a href="#">5.2.2.1</a> <a href="#">Build Alternative B Bicycle Access</a> .....	28
	<a href="#">5.2.2.2</a> <a href="#">Build Alternative B City Park Impacts</a> .....	29
	<a href="#">5.2.2.3</a> <a href="#">Build Alternative B Construction Impacts</a> .....	29
	<a href="#">5.2.2.4</a> <a href="#">Build Alternative B Impacts to Cultural Resources</a> .....	29
	<a href="#">5.2.2.5</a> <a href="#">Build Alternative B Financial Resources</a> .....	30
	<a href="#">5.2.2.6</a> <a href="#">Build Alternative B Flooding and Stormwater Management</a> .....	30
	<a href="#">5.2.2.7</a> <a href="#">Build Alternative B GW Parkway Aesthetics</a> .....	31
	<a href="#">5.2.2.8</a> <a href="#">Build Alternative B GW Parkway Environmental Mitigation</a> .....	32
	<a href="#">5.2.2.9</a> <a href="#">Build Alternative B Land Use</a> .....	32
	<a href="#">5.2.2.10</a> <a href="#">Build Alternative B Metroway and Other Bus Services</a> .....	33
	<a href="#">5.2.2.11</a> <a href="#">Build Alternative B NEPA Process and Methodology</a> .....	33
	<a href="#">5.2.2.12</a> <a href="#">Build Alternative B Noise Impacts</a> .....	33
	<a href="#">5.2.2.13</a> <a href="#">Build Alternative B Pedestrian Access</a> .....	34
	<a href="#">5.2.2.14</a> <a href="#">Build Alternative B Potomac Greens Neighborhood</a> .....	35
	<a href="#">5.2.2.15</a> <a href="#">Build Alternative B Safety and Security</a> .....	35
	<a href="#">5.2.2.16</a> <a href="#">Build Alternative B Shopping Center</a> .....	35
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	<a href="#">5.2.2.18</a> <a href="#">Support Build Alternative A or Build Alternative B</a> .....	37
	<a href="#">5.2.2.19</a> <a href="#">Support Build Alternative B or B-CSX Design Option</a> .....	37
	<a href="#">5.2.2.20</a> <a href="#">Build Alternative B Taxes</a> .....	37
	<a href="#">5.2.2.21</a> <a href="#">Build Alternative B Vehicle Traffic</a> .....	37
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5.2.4.2	<a href="#">Build Alternative D Financial Resources</a>	41
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5.2.5.6	<a href="#">Community Facilities</a>	45
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5.2.5.22	<a href="#">Natural Resources</a>	58
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5.2.5.25	<a href="#">NPS Land Impacts</a>	67
5.2.5.26	<a href="#">Other</a>	67
5.2.5.27	<a href="#">Parking</a>	68
5.2.5.28	<a href="#">Pedestrian Access</a>	68
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5.2.5.32	<a href="#">Safety and Security</a>	70
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5.2.5.34	<a href="#">Station Design</a>	71
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5.2.5.36	<a href="#">Station Ridership</a>	72
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5.2.5.38	<a href="#">Support No Build Alternative / Oppose Project</a>	73
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## 5.2.1 Build Alternative A

### 5.2.1.1 Build Alternative A City Park Impacts

**Summary of Comments:** One comment was received regarding Build Alternative A's impacts to City of Alexandria parks stating that Build Alternative A would impact the Potomac Greens neighborhood and take away a quaint park used continuously by families.

**Response:** For the Preferred Alternative, the Final EIS will specify mitigation measures for impacts to City parklands.

### 5.2.1.2 Build Alternative A Financial Resources

**Summary of Comments:** Comments relating specifically to Build Alternative A financial resources:

- Build Alternative A is less expensive than B and almost in same location;
- Build Alternative A financing does not rely on uncertain agreements with developers; and
- Debt service for Build Alternative A financing is less than other build alternatives.

**Response:** Regarding the differences in estimated capital costs among the alternatives, the Draft EIS, Section 5.1.1, Capital Cost Estimate, provides preliminary cost estimates for the Build Alternatives. Refined cost estimates will be developed as the project advances into the implementation phase. The Draft EIS, Section 5.1.2, Capital Funding Sources, lists multiple funding sources for all build alternatives including net new tax revenues and special tax districts. The section also describes developer contributions which would only be applicable to Build Alternative B. The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors in addition to cost in selecting the preferred alternative. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

### 5.2.1.3 Build Alternative A, GW Parkway Aesthetics

**Summary of Comments:** One comment was received regarding the Build Alternative A impacts to George Washington Memorial Parkway aesthetics:

- The notion that Build Alternative A is as visible and obtrusive to the parkway as Build Alternative B is absurd.

**Response:** Draft EIS Section 3.8 Visual Resources evaluates the impacts from six GWMP viewsheds as well as from the continuous GWMP corridor in the study area for the alternatives, including both Build Alternative A and Build Alternative B. The narrative and the visual quality ratings list different impacts for Build Alternative A (Section 3.8.3.2) and Build Alternative B (Section 3.8.3.3) at several of the GWMP viewsheds. Build Alternative B would diminish visual quality within several GWMP viewsheds but this diminishment would lessen over time as replanted vegetation matures and further screens views of Build Alternative B from the GWMP.

#### 5.2.1.4 Build Alternative A, GW Parkway Environmental Mitigation

**Summary of Comments:** One comment was received regarding impacts to natural resources within the George Washington Parkway:

- Alternative A would result in fewer trees removed, improve buffering for sea level rise and storm surge, and have less impacts to the Green Scenic Area Easement than Alternative B. The commenter also noted that Daingerfield Island is part of the designated floodplain and should continue to serve as a buffer protecting other areas from flooding.

**Response:** The Final EIS will provide additional details on proposed mitigation measures for impacts to the George Washington Memorial Parkway, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsible agencies.

#### 5.2.1.5 Build Alternative A Land Use Impacts

**Summary of Comments:** Comments relating specifically to Build Alternative A land use impacts were:

- Alternative A provides less readily available access to the commercial areas in Potomac Yard;
- Alternative A has negative impacts on Potomac Greens neighborhood and adjacent parks; and
- Difference in distance from Alternative A versus Alternative B station locations to highest density development is insignificant.

**Response:** The City of Alexandria adopted of Build Alternative B as the preferred alternative for the project on May 20, 2015, Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The Final EIS will specify mitigation measures for impacts to parklands by the preferred alternative. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors in its selection, including those resource areas and factors listed in the comments received as well as all other resources and factors evaluated in in the Draft EIS.

#### 5.2.1.6 Build Alternative A Noise Impacts

**Summary of Comments:** Comments expressed that Build Alternative A would have the greatest noise impacts on the Potomac Greens neighborhood.

**Response:** Noise and vibration impacts for each of the build alternatives were evaluated in the Draft EIS. The City of Alexandria adopted Build Alternative B as the preferred alternative for the project on May 20, 2015, Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The Draft EIS, Section 3.12, Noise & Vibration discusses potential noise and vibration impacts of Build Alternative B, including proposed mitigation measures.

#### 5.2.1.7 Build Alternative A Planning and Zoning Consistency

**Summary of Comments:** One comment noted that the inconsistency of Alternative A with existing zoning was created by the City after Alternative A was originally established.

**Response:** With regard to planning and zoning consistency of Build Alternative A, the Draft EIS, Section 3.4 Land Use and Zoning, subsection 3.4.3.9 states that Build Alternative A would be inconsistent with the approved zoning for CDD #19. This zoning was adopted based on the City's most recent small area plan for the area, the North Potomac Yard Small Area Plan (2010).

### 5.2.1.8 Build Alternative A Potomac Greens Neighborhood

**Summary of Comments:** 2 comments were received expressing concern regarding Build Alternative A's overall impact to the Potomac Greens neighborhood, including the impact of the station proximity on residences and Potomac Greens Park.

**Response:** Impacts relevant to the Potomac Greens neighborhood were evaluated in the Draft EIS. Please note though that the City of Alexandria adopted Build Alternative B as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The Final EIS will describe impacts to neighborhoods in its vicinity, including the Potomac Greens neighborhood, and will specify mitigation measures.

### 5.2.1.9 Build Alternative A Shopping Center

**Summary of Comments:** 1 comment was stating that an advantage of Build Alternative A is that it would not affect the movie theater.

**Response:** The Draft EIS, Section 3.4 Land Use and Zoning, states the impacts of the Build Alternatives on surrounding uses, including the shopping center. Neither Build Alternative A nor Build Alternative B would displace the existing shopping center or movie theater. Under Build Alternative B, the northern station entrance would touch down on a portion of the shopping center parking lot that, in the future, is planned for redevelopment and open space as part of a dense mixed-use development incorporating a Metrorail station entrance.

The Draft EIS, Section 2.1, Local Planning Process, summarizes City of Alexandria small area planning for North Potomac Yard, which includes the existing Potomac Yard Shopping Center. The City's adopted North Potomac Yard Small Area Plan envisions the replacement of the retail center with a high-density, transit-oriented neighborhood, including 7.525 million square feet of office, retail, residential, and hotel uses.

### 5.2.1.10 Support Build Alternative A

**Summary of Comments:** 13 comments were submitted expressing support for Build Alternative A. The following rationales were given in support of the alternative:

- Building along pre-existing track will save the taxpayers and WMATA a lot of money;
- Alternative A is only three blocks from Alternative B, and the small difference in location is not worth the additional cost for B;
- Alternative A provides the greatest benefit to existing Alexandria businesses such as those along Slaters Lane, compared to more northern station locations closer to Arlington County and relying on the future North Potomac Yard redevelopment;
- Homeowners in Potomac Greens knew about the Alternative A station location when they bought their homes;
- Alternative A has less impact on the GWMP than other alternatives;
- Alternative A has less impact on the Greens Scenic Area; and
- Alternative A is the site planned in the 1970s.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors in its selection, including those resource areas and factors listed in the comments received as well as all other resources and factors evaluated in the Draft EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS.

**Summary of Comments:** 2 comments were received expressing concern regarding Build Alternative A's vibration impacts to the Potomac Greens neighborhood.

**Response:** The City of Alexandria adopted Build Alternative B as the preferred alternative for the project on May 20, 2015. As evaluated in the Draft EIS, Section 3.12, Noise & Vibration, Build Alternative B would have no permanent vibration impacts. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

The Draft EIS, Section 3.24.4 describes mitigation of potential vibration impacts due to construction activities. During construction, the project will implement vibration control measures as discussed in Section 3.24.4.1 of the Draft EIS. All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision. Further details of the mitigation measures will be developed during the final design phase of the project when the details of the project components and the construction scenarios are finalized. FTA's vibration criteria take into consideration sensitive receptors for potential impacts.

To minimize construction-related vibration and address any potential exceedances of local ordinances, the project construction activities will consider using vibration control measures, as stated in the Draft EIS. Specific measures could include use of alternative equipment to reduce vibration, operating high vibration sources as far away from sensitive receptors as possible, vibration monitoring during construction, public notification programs to alert residents in advance of particularly disruptive activities, and complaint resolution procedures. No pile driving is anticipated, which will help minimize any vibration impacts. Additional details regarding minimization and mitigation techniques will be included in the Final EIS and/or future design phases as appropriate.

## 5.2.2 Build Alternative B

### 5.2.2.1 Build Alternative B Bicycle Access

**Summary of Comments:** Comments relating specifically to Build Alternative B bicycle access:

- Recommendation to remove the Potomac Greens station access point for Build Alternative B and move it further south to the area in the vicinity of the traffic circle near the boundary of the Potomac Greens and the Old Town Greens neighborhoods.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

The proposed station designs included in the Draft EIS, Section 2.3, Build Alternatives, locate the Potomac Greens pedestrian/bicycle bridge close to the station to facilitate the ability of Metrorail passengers to access the station via walking and bicycle. A separate pedestrian bridge located at the south end of the Potomac Greens neighborhood would significantly lengthen the average walking distance to the station for Potomac Greens residents and would also require the construction of a third pedestrian bridge over the Metrorail and CSXT tracks (in addition to the two bridges providing pedestrian access to the Metrorail station from Potomac Yard).

#### 5.2.2.2 Build Alternative B City Park Impacts

**Summary of Comments:** One comment was received regarding Build Alternative B's impacts to City of Alexandria parks:

- Build Alternative B would impact the northern end of Potomac Yard Park, and the Alexandria Beautification Commission recommends moving the station outside of the park during final station design, or, if not possible, that mitigation measures be taken to minimize the impact of this intrusion into the park.

**Response:** The Final EIS will specify mitigation measures for impacts to parklands.

#### 5.2.2.3 Build Alternative B Construction Impacts

**Summary of Comments:** Comments relating specifically to Build Alternative B construction-related issues:

- The Old Town Greens Townhome Owners Association owns the WMATA Access Road associated with Build Alternative B and has not consented to construction access.

**Response:** Appropriate access arrangements with property owners will be obtained for all affected properties prior to construction.

#### 5.2.2.4 Build Alternative B Impacts to Cultural Resources

**Summary of Comments:** Specific comments related to Build Alternative B's impacts on the GWMP:

- Build Alternative B would destroy part of the City's cultural and scenic heritage; and
- Fixing up Dangerfield Island is laudable, but it is not part of the purpose of the GWMP and in no way compensates for its degradation.

**Response:** The Draft EIS, Section 3.9 Cultural Resources describes potential impacts to historic resources, such as the George Washington Memorial Parkway. Section 106 of the National Historic Preservation Act requires the Federal Transit Administration (FTA) to consider the effects of its actions on historic properties. FTA is responsible for compliance with Section 106 and initiated the review process with the Virginia Department of Historic Resources (VDHR). In addition to seeking the views of VDHR, FTA has invited certain organizations and individuals who have a demonstrated interest in the project, such as the National Park Service, to participate in the process. These organizations and individuals are referred to as Section 106 consulting parties, and review information relevant to the identification, evaluation and assessment of effects to historic properties that could result from the project. FTA and VDHR work with each other and the consulting parties to resolve project-related adverse effects to historic properties through a Memorandum of Agreement (MOA). The Final EIS will include details on proposed mitigation measures to address impacts to historic resources.

### 5.2.2.5 Build Alternative B Financial Resources

**Summary of Comments:** Comments relating to Build Alternative B financial resources:

- Build Alternative B is more expensive than Build Alternative A;
- Debt service for Build Alternative B financing is more than other build alternatives;
- Concern that the developer will contribute less for Build Alternative B than previously agreed;
- Costs associated with Build Alternative B include compensating NPS for impacting parklands and restoring wetlands/soil; and
- Loss of Potomac Yard Shopping Center and its tax revenue is not accounted for in the City financial plan.

**Response:** The Draft EIS, Section 5.1.1, Capital Cost Estimate, provides preliminary cost estimates for the Build Alternatives. The cost of mitigation, including wetlands replacement and soil mitigation, is included in the cost estimates. Refined cost estimates will be developed as the project advances into the implementation phase. The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria. The City of Alexandria's financial feasibility analysis for Build Alternative B and factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors in addition to cost in selecting the preferred alternative.

With regard to the existing shopping center, the Draft EIS, Section 3.4 Land Use and Zoning, states the impacts of the Build Alternatives on surrounding uses. Neither Build Alternative A nor Build Alternative B would displace the existing shopping center or movie theater. Under Build Alternative B, the northern station entrance would touch down on a portion of the shopping center parking lot that, in the future, is planned for redevelopment and open space as part of a dense mixed-use development incorporating a Metrorail station entrance. The Draft EIS, Section 2.1, Local Planning Process, summarizes City of Alexandria small area planning for North Potomac Yard, which includes the existing Potomac Yard Shopping Center. The City's adopted North Potomac Yard Small Area Plan envisions the replacement of the retail center with a high-density, transit-oriented neighborhood, including 7.525 million square feet of office, retail, residential, and hotel uses.

### 5.2.2.6 Build Alternative B Flooding and Stormwater Management

**Summary of Comments:** Comments expressed the following concerns:

- Alternative B has greater impervious area than Alternative A;
- Alternative B impacts greater areas of 100-year floodplain than Alternative A;
- The buffering effect for sea level rise and near-term storm surges is significantly better for Alternative A than Alternative B; and
- Concern regarding overall increase in impermeable surface under Alternative B and request that the final design of the Metrorail Station incorporate permeable surfaces to the greatest extent possible.

**Response:** The Draft EIS, Section 3.13, Water Quality, states that although additional impervious surface and runoff would result from Build Alternative B, the project would adhere to water quality performance management criteria set by the City of Alexandria in accordance with Sec. 13-109 § (5) of the City Zoning Ordinance, which control the rate and water quality of stormwater runoff. These existing stormwater management plans and practices in the City of Alexandria would minimize potential impacts from increases in impervious surface. The project will comply with Executive Order 11990, which addresses the no net loss of wetlands including in reference to their flooding and stormwater management benefits, and with Executive Order 13690, which contains a new Federal Flood Risk Management Standard. In addition, Draft EIS, Section 3.19, Sustainability, states that Build Alternative B will be designed consistent with the local sustainability requirements. Station design features that comply with green building policies and objectives, such as LEED Silver Certification, would be developed during detailed design phases of the project. A commitment to incorporate resiliency measures for foreseeable cumulative climate change impacts, in particular flooding, will be added to the Final EIS, including elevation of structures above the 500-foot floodplain.

### 5.2.2.7 Build Alternative B GW Parkway Aesthetics

**Summary of Comments:** Comments that specifically addressed Build Alternative B's visual impacts to the GWMP included the following:

- Build Alternative B is clearly visible from the GWMP and will largely extinguish the “special entrance” of the Parkway as it enters Alexandria;
- The long and high pedestrian bridge at the northern end of the station into Potomac Yard is especially visible as it is practically parallel to the Parkway;
- The notion that Build Alternative A is as visible and obtrusive to the GWMP as Build Alternative B is absurd.

**Response:** The Draft EIS, Section 3.8, Visual Resources, evaluates potential impacts to study area visual resources, including GWMP viewsheds. Build Alternative B would diminish visual quality within several GWMP viewsheds but this diminishment would lessen over time as replanted vegetation matures. Under the No Build Alternative, the continuous GWMP Corridor within the study area has a visual quality rating of Very High in 2016 and High in 2040 (due to the base level of new development planned within Potomac Yard regardless of the project). Under Build Alternative B, the continuous GWMP Corridor within the study area has a visual quality rating of High in 2016 (due to the encroachment of the station and track into some viewsheds) and High in 2040 (vegetation has matured within affected viewsheds).

The pedestrian bridges for all alternatives have been designed based on the minimum vertical clearance requirements above the CSXT railroad tracks. The Draft EIS, Section 3.8.4, Mitigation, states that station building design and materials will be refined during later project phases to mitigate impacts on visual resources.

Regarding Build Alternative B's visual impacts to the George Washington Memorial Parkway (GWMP) compared to those of Build Alternative A, the Draft EIS Section 3.8 Visual Resources evaluates the impacts from six GWMP viewsheds as well as from the continuous GWMP corridor in the study area. The narrative and the visual quality ratings list different impacts for Build Alternative A (Section 3.8.3.2) and Build Alternative B (Section 3.8.3.3) at several of the GWMP viewsheds.

As stated in the Draft EIS, Section 3.8 Visual Resources and Section 3.9 Cultural Resources, measures to minimize and mitigate the project's visual impacts to the George Washington Memorial Parkway will be developed in coordination with the National Park Service, City of Alexandria, Virginia Department of Historic Resources, and other consulting parties for the review of the project for consistency with Section 106 of the National Historic Preservation Act. These measures will be described in the Final EIS and implemented through a Memorandum of Agreement as part of the NEPA and Section 106 processes.

### 5.2.2.8 Build Alternative B GW Parkway Environmental Mitigation

**Summary of Comments:** Two comments were received regarding impacts to natural resources within the George Washington Parkway:

- Concern that improvements to Daingerfield Island as mitigation for Alternative B could be interpreted as including residential development. The commenter also noted that Daingerfield Island is part of the designated floodplain and should continue to serve as a buffer protecting other areas from flooding; and
- The National Capital Planning Commission (NCPC) indicates that it will defer to NPS to identify potential mitigation measures if Alternative B or Alternative D is selected as the preferred alternative, requiring property transfers or easement modifications between the City of Alexandria and NPS.

**Response:** The Final EIS will provide additional details on proposed mitigation measures for impacts to the George Washington Memorial Parkway, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsible agencies. Key architectural design refinements, such as modifications to the retaining wall, fill areas around the station, and resulting station height relative to grade level, will be included in the FEIS and its impact evaluations. Additional minor refinements proposed for mitigation of project impacts will be specified in the Record of Decision.

### 5.2.2.9 Build Alternative B Land Use

**Summary of Comments:** Comments relating specifically to Build Alternative B land use impacts were:

- Difference in distance from Alternative A versus Alternative B station locations to North Potomac Yard is not significant;
- The study expects that Build Alternative B will create more density than Build Alternative A without any real basis, and the argument is tautological since the extra density is allowed only under Alternative B.

**Response:** With regard to land use in proximity to the alternative station locations, the Draft EIS, Section 2.5.3, Support for Project Purpose and Need, assessed the number of residents within 1/2 mile and number of employees within 1/4 mile of the proposed station entrances in 2040 based on approved development plans. In addition to the stations' proximity to planned development blocks, the estimates also account for the different levels of development permitted under each alternative based on approved plans and the resulting differing densities of development blocks within North Potomac Yard under each of the alternatives.

Regarding the difference in location of Build Alternatives A and B with respect to the high-density development in North Potomac Yard: when measured using walking distances (along pedestrian bridges and sidewalks) from the station faregates (inside the northern end of each station building) to the center of the planned high-density office/retail area (near the northeast corner of the current Target store), Build Alternative B is 800 feet away while Build Alternative A is 1,650 feet away, a difference of 850 feet.

With regard to planned density and zoning regulations, the Draft EIS, Section 2.1, Local Planning Process, and Section 3.5, Consistency with Local Plans, describe the City of Alexandria's plans for the Potomac Yard area, including the types and intensities of development and open space recommended in adopted plans. Section 3.4.3.7, Zoning, describes the amount of development allowed under each Build Alternative based on adopted regulations.

The City of Alexandria's factors for the selection of Build Alternative B as the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)).

### 5.2.2.10 Build Alternative B Metroway and Other Bus Services

**Summary of Comments:** One comment stated that Build Alternative B was not needed because the Metroway Bus Rapid Transit line can adequately serve transit demand in the corridor.

**Response:** The Draft EIS Section 1.3, Project Purpose and Need, describes the role of Metroway in the project study area and the need for new transit services, in addition to Metroway, to accommodate the area's forecast increase in travel demand and to provide a direct access point to the regional transit system within Potomac Yard.

### 5.2.2.11 Build Alternative B NEPA Process and Methodology

**Summary of Comments:** 2 comments were received stating that the Draft EIS should have included information from the agreement between NPS and the City of Alexandria regarding Build Alternative B, which was made shortly after release of the Draft EIS.

**Response:** The Final EIS will incorporate any new information affecting the project since the publication of the Draft EIS and will be released for public review. Any additional agreements made between the cooperating agencies will be included in the Final EIS and is required as part of the Record of Decision (ROD).

### 5.2.2.12 Build Alternative B Noise Impacts

**Summary of Comments:** The following comments addressed specific features of Build Alternative B:

- Findings from the commenter's own audio site survey that compared the traffic noise pattern of Braddock Road station with the current noise levels of the Potomac Greens neighborhood, showed that additional vehicle traffic for passenger drop-offs and pick-ups would generate significant and potentially harmful levels of noise in the neighborhood;
- The near seamless, connected front elevations of town homes on each side of Potomac Greens Drive form a sort of "audio hallway" in which sound can travel a long distance and also be reflected onto side streets;
- Recommend eliminating the station access planned at the northern end of Potomac Greens Drive and instead relocate it further south by the traffic circle to reduce vehicular traffic for passenger pick-ups and drop-offs and associated noise; and
- Build a noise attenuation berm between the station and the neighborhood.

**Response:** The Draft EIS, Section 3.12 discusses the noise assessment, which was prepared in accordance with FTA and WMATA criteria for assessing noise impacts from mass transit facilities and vehicles. For Build Alternative B, no noise impacts based on FTA and WMATA criteria are predicted at any sensitive receptors. However, other ancillary noise sources associated with the proposed station, such as Metrorail door chimes, train conductor announcements, station public address announcements, and brake noise, may be audible in the community as a new noise source but are not expected to contribute to any exceedance or noise impact, as the ambient noise levels are significantly higher. As a result, these ancillary sources were not included in the noise assessment but would be evaluated more closely during final design when the station features are finalized, and would be mitigated, as appropriate. Proposed mitigation measures include solid platform windscreens that would mostly enclose the platform area and help screen internal noise from the outside, and design of the station public address system with speakers at relatively close spacing, permitting lower audio volumes. All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision.

Some additional vehicular trips may use local neighborhood streets to access the station for passenger drop-offs and pick-ups. Although these additional trips are not expected to degrade traffic conditions, they may be noticeable on streets that currently have very low traffic volumes. The noise assessment prepared for the Draft EIS concluded that vehicular traffic in the Potomac Greens neighborhood would not result in noise impacts to residences. The Final EIS will discuss potential measures, such as traffic calming, that the City of Alexandria may implement in coordination with local neighborhoods to address any localized increases in cut-through traffic that occur on local residential streets.

With regard to moving pedestrian access to the station from the northern end of Potomac Greens Drive to a location further south:

- A separate pedestrian bridge located at the south end of the Potomac Greens neighborhood would significantly lengthen the average walking distance to the station for Potomac Greens residents. As proposed in the Draft EIS, the walking distance for residents of Potomac Greens to access the Potomac Yard station (from the bridge touchdown to faregates) is around 500 feet. If the pedestrian bridge was located at the traffic circle of Potomac Greens Drive and Carpenter Road, the walking distance for residents of Potomac Greens to access the station would be around 2,800 feet (over 1/2 mile).
- Moving the bridge would also require the construction of a third pedestrian bridge over the Metrorail and CSXT tracks (in addition to the two bridges providing pedestrian access to the Metrorail station from Potomac Yard).

With regard to the findings of the audio site survey conducted by one of the commenters, specifically its findings that the project would generate significant and potentially harmful levels of noise in the neighborhood:

- The Project Team is unable to assess the accuracy of the independent noise analysis due to the lack of supporting technical information provided in the comment and the use of different measurement types than those used by FTA and WMATA criteria.
- The potential for an “audio hallway” that channels station noise south into the neighborhood along Potomac Greens Drive will be reviewed in the Final EIS.

With regard to the recommendation for constructing a landscaped earthen berm and retaining wall to reduce station noise impacts (as well as visual impacts) to the Potomac Greens neighborhood:

- For the proposed berm to be effective, it would need to be more than 50 feet in height to block station mezzanine noise and the view of the station. Such a structure would have a noticeable impact on the community aesthetics at the northern end of the neighborhood and would probably eliminate the existing park.

### 5.2.2.13 Build Alternative B Pedestrian Access

**Summary of Comments:** In addition to the comments above related to all build alternatives, for Build Alternative B, several comments were received:

- Request that pedestrian access to the station from the northern end of Potomac Greens Drive be relocated further south near the traffic circle to reduce vehicular traffic in the neighborhood; and
- Alternative B is located only 500 feet closer to the North Potomac Yard development compared to Alternative A, as measured from the center of the station platforms to the Target store.

**Response:** The proposed station designs included in the Draft EIS, Section 2.3, Build Alternatives, locate the Potomac Greens pedestrian/bicycle bridge close to the station to facilitate the ability of Metrorail passengers to access the station via walking and bicycle.

A separate pedestrian bridge located at the south end of the Potomac Greens neighborhood would significantly lengthen the average walking distance to the station for Potomac Greens residents. As proposed in the Draft EIS, the walking distance for residents of Potomac Greens to access the Potomac Yard station (from the bridge touchdown to faregates) is around 500 feet. If the pedestrian bridge was located at the traffic circle of Potomac Greens Drive and Carpenter Road, the walking distance for residents of Potomac Greens to access the station would be around 2,800 feet (over 1/2 mile). Moving the bridge would also require the construction of a third pedestrian bridge over the Metrorail and CSXT tracks (in addition to the two bridges providing pedestrian access to the Metrorail station from Potomac Yard).

The Draft EIS, Section 3.2.3, discusses the potential impacts of a new Metrorail station at Potomac Yard on area traffic conditions. The station is projected to generate low levels of vehicular trips similar to other urban stations; however, these additional trips resulting from the project Build Alternatives would have no effect on overall intersection Level of Service (LOS) in the study area compared to the No Build condition, including intersections within the Potomac Greens neighborhood.

Regarding the difference in location of Build Alternatives A and B with respect to the high-density development in North Potomac Yard: when measured using walking distances (along pedestrian bridges and sidewalks) from the station faregates (inside the northern end of each station building) to the center of the planned high-density office/retail area (near the northeast corner of the current Target store), Build Alternative B is 800 feet away while Build Alternative A is 1,650 feet away, a difference of 850 feet.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors including station accessibility to existing and planned development as well others

#### 5.2.2.14 Build Alternative B Potomac Greens Neighborhood

**Summary of Comments:** 6 comments were submitted regarding Build Alternative B's impacts to the Potomac Greens neighborhood. These comments expressed the same general project impacts as those that are summarized under **Section 5.2.5.20** "General Comments, Potomac Greens Neighborhood." Please refer to comment summaries and responses in that section.

#### 5.2.2.15 Build Alternative B Safety and Security

**Summary of Comments:** 4 comments were received expressing concern with safety and security in the Potomac Greens neighborhood as a result of the station and the proposed pedestrian access point from the northern end of the neighborhood.

- Station will bring non-residents into the neighborhood and increase crime;
- Build Alternative B station will be a hang-out spot in the evening after nearby Potomac Yard businesses close; and
- Recommend that the pedestrian access to the station from the northern end of Potomac Greens Drive be relocated further south near the traffic circle to reduce vehicular traffic in the neighborhood or limiting access to the station from Potomac Greens for neighborhood residents only.

**Response:** The Draft EIS, Section 3.21, Safety and Security, describes measures used at Metrorail stations to create a secure environment for patrons. WMATA's Metro Transit Police Department will perform law enforcement and public safety services at the station, and the City of Alexandria Police Department will perform these services in the station vicinity. All comments received on the Draft EIS have been reviewed by the City of Alexandria.

The proposed station designs included in the Draft EIS, Section 2.3, Build Alternatives, locate the Potomac Greens pedestrian/bicycle bridge close to the station to facilitate the ability of Metrorail passengers to access the station via walking and bicycle.

#### 5.2.2.16 Build Alternative B Shopping Center

**Summary of Comments:** 1 comment was submitted regarding Build Alternative B's impacts to the Shopping Center. This comment expressed the same general project impacts as those that are summarized under "General Comments, Shopping Center." Please refer to comment summaries and responses in that section.

### 5.2.2.17 Support Build Alternative B

**Summary of Comments:** 48 comments were submitted that expressed support for Build Alternative B as the preferred alternative. The comments noted the following advantages and benefits of Build Alternative B relative to the other alternatives and relative to its impacts:

- Location closer to high-density mixed-use development planned for North Potomac Yard than Build Alternative A;
- Provides the most support to planned transit-oriented development and compact walkable development, which reduce the need for development in more distant auto-dependent suburban locations and maximize trips by transit, walking and bicycling;
- Helps reduce air pollution and greenhouse gas emissions by supporting compact development and maximizing non-auto trips;
- Supports City economic development by allowing highest amount of development in proximity to the new Metrorail station, and regionally Metrorail station areas are the most desirable location for new office construction;
- Less costly than Build Alternative D and B-CSX Design Option;
- Fewer challenges related to engineering and coordination with CSXT and property owners compared to Build Alternative D and B-CSX Design Option;
- Makes City a more competitive commercial real estate market by allowing highest amount of commercial development within proximity to a Metrorail station;
- Greater commercial development supported can reduce the City's reliance on residential property taxes;
- Best supports the City's adopted North Potomac Yard Small Area Plan;
- Removes most cars from U.S. Route 1;
- Serves the highest number of Metrorail riders;
- Consistent with City of Alexandria Staff Recommendation;
- Supports the overall intent of the City of Alexandria's Environmental Action Plan recommendations for substantial reductions in daily vehicle miles traveled and increased access to integrated transit, as well as energy conservation and climate change mitigation;
- Supports Alternative B provided that environmental impacts to wetlands, stormwater, and the GWMP are mitigated;
- Mitigation for Build Alternative B's environmental impacts presents opportunities to improve wetland habitat and stormwater management;
- Mitigation should include Construction Access Option 2, no access from the GWMP;
- Reduces negative impacts to Potomac Greens compared to Build Alternative A, while still providing convenient access to the station; and
- Impacts to neighborhoods from construction would be outweighed by benefits of the station.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The City of Alexandria's *Staff Recommendation for the Preferred Alternative* is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). Many of the comments received are reflected in the City's Staff Recommendation for Build Alternative B. The preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS.

### 5.2.2.18 Support Build Alternative A or Build Alternative B

**Summary of Comments:** 4 comments, including one by the Virginia Department of Rail and Public Transportation, expressed support for either Build Alternative A or Build Alternative B above other alternatives, including the No Build Alternative.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS.

### 5.2.2.19 Support Build Alternative B or B-CSX Design Option

**Summary of Comments:** Two comments supporting Build Alternative B or B-CSX Design Option were received:

- As residents of the Potomac Greens Neighborhood, the comment authors would prefer that the City pursue either Alternative B or B-CSX Design Option since they would have less direct adverse impacts on their neighborhood; and
- Preference for B-CSX Design Option provided there are agreements between the City and CSXT and developers regarding the project and its funding, a revised master plan for Potomac Yard, and that it does not delay the project; alternatively, Alternative B should be chosen.

**Response:** Preferences for Alternative B and B-CSX Design option have been noted. It is unlikely that B-CSX Design Option would be completed as quickly as the other alternatives given the need to relocate the existing freight and passenger rail line, coordination and establishing agreements with CSXT, Amtrak, and Virginia Railway Express (VRE), and completing the Master Plan revisions necessary to accommodate the new station. Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS.

### 5.2.2.20 Build Alternative B Taxes

**Summary of Comments:** 2 comments were submitted regarding City taxes related to Build Alternative B. The comments expressed the same general project impacts as those that are summarized under **Section 5.2.5.39** "General Comments, Taxes." Please refer to comment summaries and responses in that section.

### 5.2.2.21 Build Alternative B Vehicle Traffic

**Summary of Comments:** 5 comments were submitted regarding vehicle traffic related to Build Alternative B. The comments expressed the same general project impacts as those that are summarized under **Section 5.2.5.40** "General Comments, Vehicle Traffic." Please refer to comment summaries and responses in that section.

### 5.2.2.22 Build Alternative B Utilities

1 comment was received regarding utilities affected by the Build Alternative B:

**Summary of Comments:** Additional evaluation should be included in the EIS regarding project impacts related to the planned new Dominion Power electrical line.

**Response:** The Final EIS, Section 3.22, Utilities, will include additional analysis on the Preferred Alternative's potential impacts to the planned new Dominion Power electrical line.

### 5.2.2.23 Build Alternative B Wetlands

**Summary of Comments:** Build Alternative B would have a greater impact on wetlands than any of the build alternatives.

**Response:** The Draft EIS, Section 3.14, Waters of the United States (Wetlands), describes potential impacts and identifies minimization and mitigation measures. NPS may also approve the use of regulated wetlands and floodplains on NPS land in accordance with Director's Orders 77-1 and 77-2, which establish the policies, requirements, and standards through which the NPS will meet its responsibilities to protect and preserve wetlands and floodplains. A Wetland and Floodplain Statement of Findings is currently being prepared by NPS in accordance with the Director's Orders, which will include measures to mitigate impacts to wetlands and floodplains. The Statement of Findings will be published with the Final EIS, and all mitigation measures for the Preferred Alternative will be specified in the Record of Decision. In addition, a Joint Permit Application would be developed for both permanent and temporary project-related wetland impacts in compliance with Section 404 of the Clean Water Act; the permitting process would be initiated with the U.S. Army Corps of Engineers (USACE), Virginia Department of Environmental Quality (VDEQ), and NPS. If wetlands are deemed tidal wetlands, the permitting process would also be initiated with the Virginia Marine Resources Commission (VMRC). Further details of the mitigation measures will be developed in accordance with NPS and USACE during the final design phase of the project when details of the project components and the construction scenarios are finalized.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors in addition to impacts to wetlands and other Waters of the U.S. in selecting the preferred alternative.

## 5.2.3 B-CSX Design Option

### 5.2.3.1 B-CSX Design Option Amtrak, VRE, and CSX Impacts

**Summary of Comments:** Comments were received expressing concerns regarding potential project impacts to the operations along the CSX line, which could affect Amtrak and VRE services as well as CSX freight rail operations. Most comments pertained to B-CSX Design Option, which include the following:

- Both VRE and the Virginia Department of Public Transportation submitted comments opposing B-CSX Design Option, stating that it posed the greatest potential negative impacts to rail operations; and
- CSXT submitted a comment expressing that its preference is that B-CSX Design Option not be selected; however, if it were selected, CSXT stated a number of conditions that would need to be met.

**Response:** The City of Alexandria's adopted Build Alternative B as the preferred alternative for the project on May 20, 2015.. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. Construction activities for the preferred alternative will be scheduled and coordinated with CSXT, Amtrak, and Virginia Railway Express to avoid or minimize impacts to operations of freight, commuter, and passenger rail services along the CSXT line.

### 5.2.3.2 B-CSX Design Option Financial Resources

**Summary of Comments:** Comments relating specifically to B-CSX Design Option financial resources:

- Concern that extra engineering work associated with B-CSX Design Option would delay the project and be too costly.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. The City of Alexandria's financial feasibility analysis for B-CSX Design Option and factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors in addition to cost in selecting their preferred alternative.

### 5.2.3.3 Support B-CSX Design Option

**Summary of Comments:** 13 comments were submitted expressing support for B-CSX Design Option. The following rationales were given in support of the alternative:

- Serves the greatest community and commercial interests, and it minimizes the environmental/scenic impacts on the Parkway;
- Does the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria and maximizes the transportation, economic and environmental benefits of the Metrorail station;
- Although B-CSX Design Option may reduce land available for other economic uses, this location can help increase the value of adjacent properties, while Alternative B provides little opportunity to add value to adjacent residential properties;
- Has the least negative impacts on the Potomac Greens neighborhood;
- Closest to businesses;
- Most passengers/revenue;
- Not overly expensive as Build Alternative D;
- Reduces impacts to the GWMP;
- Least impacts on forest resources; and
- Can address the concerns of CSXT and VRE.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors in its selection, including those resource areas and factors listed in the comments received as well as all other resources and factors evaluated in the Draft EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS.

#### 5.2.3.4 B-CSX Design Option Wetland Impacts

**Summary of Comments:** B-CSX Design Option would have the least impact on wetlands; why is B-CSX not the correct location for the new station based on this data point?

**Response:** The Draft EIS, Section 3.14, Waters of the United States (Wetlands), describes potential impacts and identifies minimization and mitigation measures. NPS may also approve the use of regulated wetlands and floodplains on NPS land in accordance with Director's Orders 77-1 and 77-2, which establish the policies, requirements, and standards through which the NPS will meet its responsibilities to protect and preserve wetlands and floodplains. A Wetland and Floodplain Statement of Findings is currently being prepared by NPS in accordance with the Director's Orders, which will include measures to mitigate impacts to wetlands and floodplains. The Statement of Findings will be published with the Final EIS, and all mitigation measures for the Preferred Alternative will be specified in the Record of Decision. Further details of the mitigation measures will be developed in accordance with NPS and USACE during the final design phase of the project when details of the project components and the construction scenarios are finalized.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors in addition to impacts to wetlands and other Waters of the U.S. in selecting the preferred alternative.

#### 5.2.4 Build Alternative D

##### 5.2.4.1 Amtrak, VRE, and CSX Impacts

**Summary of Comments:** Concern regarding construction of aerial crossings for Build Alternative D over the CSX line and resulting potential for service disruptions.

**Response:** Construction activities for the preferred alternative will be scheduled and coordinated with CSXT, Amtrak, and Virginia Railway Express to avoid or minimize impacts to operations of freight, commuter, and passenger rail services along the CSXT line

#### 5.2.4.2 Build Alternative D Financial Resources

**Summary of Comments:** Comments relating specifically to Build Alternative D financial resources:

- Build Alternative D is too expensive.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. The City of Alexandria's financial feasibility analysis for Build Alternative D and factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors in addition to cost in selecting the preferred alternative.

#### 5.2.4.3 Support Build Alternative D

**Summary of Comments:** One comment indicated support for Alternative D since it was closer to the Arlandria and Lynhaven neighborhoods and would not require that residents of these areas to use the pedestrian bridges to access the station.

**Response:** The relative accessibility of Alternative D to neighborhoods near the northern portion of the project study area has been noted. Following the public comment period, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS.

#### 5.2.4.4 Build Alternative D Pedestrian Access

**Summary of Comments:** 2 comments were received regarding Build Alternative D's relative pedestrian accessibility:

- Alternative D is more accessible to neighborhoods in the northern part of the study area, because patrons would not have to use pedestrian bridges to access the station; and
- Pedestrian bridges do not deter Metrorail passengers.

**Response:** Following the public comment period, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. The City considered a range of factors, including pedestrian accessibility, in selecting the preferred alternative.

#### 5.2.4.5 Build Alternative D Potomac Greens

**Summary of Comments:** 1 comment was received expressing concern regarding Build Alternative D's overall impact to the Potomac Greens neighborhood.

**Response:** The City of Alexandria adopted Build Alternative B as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The Final EIS will describe the preferred alternative's impact to neighborhoods in its vicinity, including the Potomac Greens neighborhood, and will specify mitigation measures.

#### 5.2.4.6 Build Alternative D Utilities

1 comment was received regarding utilities affected by the Build Alternative D:

**Summary of Comments:** Additional evaluation should be included in the EIS regarding project impacts related to the planned new Dominion Power electrical line.

**Response:** The Final EIS, Section 3.22, Utilities, will include additional analysis on the Preferred Alternative's potential impacts to the planned new Dominion Power electrical line.

#### 5.2.4.7 Build Alternative D Wetland Impacts

**Summary of Comments:** Comments relating specifically to Build Alternative D and its effect on Wetlands/Waters of the U.S.:

- Impact tables do not indicate there will be impacts to streams however page 3-170 states that there will be a crossing of Four Mile Run with Build Alternative D, which includes bridge piers. This would be an impact.
- Clarification of the existing stream channel mentioned on page 2-34, Build Alternative D.

**Response:** With regard to Build Alternative D's impact to Four Mile Run related to the placement of bridge piers, the comment correctly notes that the discussion of temporary construction impacts as opposed to the permanent impacts associated with the bridge piers is unclear as written in Section 3.24. For the Preferred Alternative, any discussion in the Final EIS on this issue will be clarified as needed.

The City of Alexandria's adopted of Build Alternative B as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors in addition to impacts to wetlands and other Waters of the U.S. in selecting the preferred alternative.

### 5.2.5 General Comment

#### 5.2.5.1 Air Pollution

**Summary of Comments:** 3 comments regarding air pollution were received from EPA and VDEQ.

- Discussion of greenhouse gas emissions related to the project needs to be expanded per the Council on Environmental Quality's December 2014 revised draft guidance;
- Virginia regulations and agency jurisdiction with regard to air pollution are noted, and given the project's location in an ozone non-attainment and emission control area, all precautions are necessary to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NOx); and
- The greater development density associated with Alternative B translates into more greenhouse gas emissions.

**Response:** Further detail regarding greenhouse gas emissions and associated climate change impacts will be developed and presented in the Final EIS. This will include additional qualitative discussion of Greenhouse Gas (GHG) emissions consistent with CEQ guidance under the direction of FTA. The project is a transit facility, which typically results in net reductions in GHG emissions as a result of shifting a share of the area's personal automobile trips to mass transit. As described in Section 3.11.3.2 of the Draft EIS, the new Metrorail station is expected to result in reductions in automobile vehicle miles traveled and automobile trips based on travel demand forecasting. As a single infill station (as opposed to a new transit system), total GHGs emitted by the project on an annual basis would be well under the 25,000 metric tons of CO<sub>2</sub> equivalent emissions minimum reference point used by the Council on Environmental Quality guidance (Section III. D., Page 18) for conducting quantitative assessments of GHG emissions. The operations of the single station would generate an insignificant amount of energy use and resulting GHG emissions. Thus, the project would have no substantial impact on GHG emissions, and no mitigation measures of direct climate change impacts by the project are proposed.

With regard to the density associated with Build Alternative B, as described in Section 3.23.3.2, the indirect effects of the increased development allowed under Build Alternative B include providing more opportunities for housing and commercial uses close to the region's core in a location with Metrorail access, resulting in fewer and shorter automobile trips than if the same development were to occur farther from the core in a site without walkable Metrorail access.

Draft EIS, Section 3.19, Sustainability, states that Build Alternative B will be designed consistent with the local sustainability requirements. Station design features that comply with green building policies and objectives, such as LEED Silver Certification, that aim to reduce energy use among other goals, would be developed during detailed design phases of the project. A reference to this section will be added in the Final EIS section on GHG emissions.

All permitting requirements relating to air quality will be coordinated with VDEQ and other local and federal agencies as applicable. The project will comply with all applicable regulations regarding air quality. Best management practices to minimize air pollutant emissions during construction and operation of the project will be described in more detail in the Final EIS.

As described in Section 3.24 of the Draft EIS, to minimize construction-related effects on air quality, project construction activities would comply with VDEQ requirements for fugitive dust and emissions, as well as any local regulations. During later design phases, potential construction impacts will be re-evaluated to better gauge the likelihood of impacts, and measures will be developed to minimize and mitigate them as needed.

### 5.2.5.2 Amtrak, VRE, and CSX Impacts

**Summary of Comments:** 6 comments were received expressing concerns regarding potential project impacts to the operations along the CSX line, which could affect Amtrak and VRE services as well as CSX freight rail operations. Comments noted the following concerns:

- VRE submitted a comment noting the impacts;
- Project disruptions to the CSX line could adversely affect VRE and Amtrak service by reducing their on-time performance and ridership;
- Alternatives A, B, and D also have the potential to affect train operations in the CSXT right-of-way during construction. These potential construction impacts need more detailed discussion;
- Ongoing coordination should be maintained with VRE and CSXT to ensure information regarding planned or unplanned rail traffic stoppages or slow orders is available; and
- Plans need to be updated with current vertical and horizontal clearance requirements for the CSX right-of-way.

**Response:** As a result of the City of Alexandria's adoption of Build Alternative B as the preferred alternative for the project on May 20, 2015, neither B-CSX Design Option nor Build Alternative D will be advanced further. Construction activities for the preferred alternative will be scheduled and coordinated with CSXT, Amtrak, and Virginia Railway Express to avoid or minimize impacts to operations of freight, commuter, and passenger rail services along the CSXT line. The design criteria for clearance of the CSXT railroad tracks will be reviewed in the Final EIS. Designs for the build alternatives included in the Draft EIS meet the updated horizontal and vertical criteria stated in the comment and accommodate the future addition of a fourth CSXT track.

### 5.2.5.3 Bicycle Access

**Summary of Comments:** 16 comments were received regarding bicycle access to the station. Comments expressed the need for adequate bicycle parking facilities at the station and bicycle accommodations to reach the station:

- Station bike access and parking are being treated as an afterthought;
- Short-term bike parking should be covered and bike lockers should be considered for monthly storage;
- WMATA needs to present its plans for bicycle accommodations;
- Questions regarding safe and convenient bicycle access to the station from surrounding areas;
- Recommendation for bicycle bridge or tunnel to the GWMP;
- 24-hour access with adequate lighting between Potomac Yard and Potomac Greens;
- Request for Capital Bikeshare stations at station entrances;
- Not repeating lack of adequate bicycle parking facilities as occurred at new Silver Line stations;
- Consider a Bike Station facility with changing rooms and bicycle repair services as well as parking, or some other type of enhanced facility such as that at the University of Maryland College Park Metrorail station;
- Station will attract high numbers of cyclists from surrounding neighborhoods such as Del Ray;
- Support City Complete Streets planning by providing adequate bicycle accommodations; and
- Station should be role model for excellent bicycle facilities.

**Response:** The Draft EIS, Section 2.4, Build Alternatives, notes that all station alternatives incorporate a pedestrian and bicycle bridge between the Potomac Yard and the Potomac Greens neighborhoods that will be open 24 hours a day. Bicycle parking facilities will be provided at each station entrance in accordance with Metro station access guidelines and design criteria. More detailed design of these facilities will be included in future project design phases after the conclusion of the NEPA review process. The City of Alexandria is responsible for planning bicycle access between the station and surrounding origins/destinations. All comments received on the Draft EIS have been reviewed by the City of Alexandria.

### 5.2.5.4 Blue and Yellow Line

**Summary of Comments:** 7 comments were received with concerns regarding the Metrorail Blue and Yellow Line which would serve the new station, including the following issues:

- Draft EIS does not address current crowding on these lines and whether they can accommodate the additional riders generated by the proposed station;
- Draft EIS does not address the effect of the station on current riders;
- Draft EIS does not elaborate as to how often and how lengthy service disruptions due to construction would be, nor does it indicate whether certain alternatives would require more and/or longer disruptions than others; and
- City of Alexandria should have built the station long ago in the location identified in the Metrorail system plan in the 1970s.

**Response:** Metro’s Momentum strategic plan lays out recommendations to address Metrorail passenger crowding and other issues through the year 2025. The Draft EIS, Section 3.2.3.2 Build Alternatives, Rail Operations, estimates that the additional station would result in one additional minute of travel time along the Metrorail Blue and Yellow Lines between Braddock Road Station and Ronald Reagan Washington National Airport Station. The Draft EIS, Section 3.24, Construction Impacts, subsection 3.24.3.2, page 3-208, discusses effects of the project construction on Metrorail operations. More details regarding the frequency, duration, and type of service outages will be confirmed during the final design phase of the project when the details of the project components and construction scenarios are finalized. The Draft EIS, Section 2.1 describes the local planning process for the project, including past efforts.

#### 5.2.5.5 Climate Change and Sea Level Rise

**Summary of Comments:** 2 comments were received regarding climate change and associated flooding impacts related to sea level rise:

- The buffering effect for sea level rise and near term storm surges is significantly better for Alternative A than Alternative B; and
- U.S. EPA commented that discussion of mitigation measures related to flooding and climate change is vague.

**Response:** The Draft EIS, Section 3.23, Secondary and Cumulative Effects, discusses the potential effects of climate change on the project, including sea level rise. These effects are described as Cumulative Effects and discussed specifically in subsections 3.23.1.2 and 3.23.4. Further detail regarding mitigation measures related to flooding and climate change will be developed and presented in the Final EIS and/or later design phases and provided to agencies and stakeholders, as appropriate. A commitment to incorporate resiliency measures for foreseeable cumulative climate change impacts, in particular flooding, will be added, including elevation of structures above the 500-foot floodplain.

#### 5.2.5.6 Community Facilities

**Summary of Comments:** One comment was received regarding community facilities, inquiring if a new school will be added to accommodate the increase in residents associated with the new Potomac Yard development.

**Response:** The Draft EIS, Section 3.23.3, Secondary Effects, discusses effects to the study area from increased development under the No Build Alternative and Build Alternatives. As noted in subsection 3.23.3.1, small area plans of the City of Alexandria and Arlington County address the adequate provision of community facilities for the population within Potomac Yard and surrounding areas.

#### 5.2.5.7 Consistency with Other Plans

**Summary of Comments:** One comment indicated that the screening process used to identify the alternatives considered in the Draft EIS incorrectly classified consistency with NPS Plans and Policies under the category entitled Zoning and Local Plans, noting that NPS plans do not address zoning issues and are not local plans. The commenter also noted that the results of the consistency with zoning and local plans assessment shown in the Draft EIS differs from the results shown in Table 3-3 of the supporting Land Use, Zoning, and Consistency with Local Plans Technical Memorandum.

**Response:** To clarify Table 2-4 “Zoning and Local Plans”, the Final EIS will relabel the table as “Zoning, Local Plans, and NPS Plans and Policies.” Additionally in the Final EIS, Consistency with Local Plans (Section 3.5 in the Draft EIS) will include and assess the Organic Act similarly to the assessment of the Capper Cramton Act.

The introduction to Volume II of the Draft EIS notes that the technical memoranda were completed in February 2013, after which time some additional and updated analyses were completed for the B-CSX Design Option and Build Alternatives A, B, and D. The additional and updated results are presented in Volume I of the Draft EIS. The Final EIS will more clearly note that some of the analyses contained in the technical memoranda were subsequently updated and that the Draft EIS Volume I reflects the most up-to-date analysis. Additional clarity will be provided by updating Table 3-3 in the Land Use, Zoning, and Consistency with Local Plans Technical Memorandum to reflect the results presented in Table 2-4 and the Draft and Final EIS.

### 5.2.5.8 Construction Contracting

**Summary of Comments:** One comment questioned whether the City of Alexandria could have an oversight role in the Design-Build process for the station that is to be managed by WMATA with particular concerns about protecting the City from potential cost overruns.

**Response:** The City of Alexandria will have a role in the design of the station. The station design will be approved by the City's Board of Architectural Review and construction of the station will require permits from the City. Although the City will provide input into the design, the design-build contract will be managed by WMATA, which has experience in building similar rail projects in scope and magnitude.

### 5.2.5.9 Construction Impact

**Summary of Comments:** 19 comments were submitted expressing concern regarding the following construction-related issues. Eight of these comments were from the U.S. Environmental Protection Agency (EPA).

#### U.S. EPA Comments:

- Coordination of construction activities with those of nearby projects to reduce impacts to adjacent communities;
- Use of low-emission construction equipment;
- Consider whether a noise technician/acoustical engineer is needed during peak construction phases;
- Consider restricting the use of certain types of equipment during noise/vibration-sensitive hours. Consider restricting night work;
- Consider whether temporary relocations of noise/vibration-sensitive receptors are an option or whether relocations are necessary;
- Consider scheduling of activities to avoid or minimize adverse impacts;
- Consider using noise barriers and vibration reducing techniques or mitigation measures;
- More clearly state the construction time periods and durations;

#### Other Comments:

- Noise from construction activities affecting residents;
- Vibration from construction activities affecting residences;
- Concern regarding settling of home foundations;
- Inconveniences to residences during construction;
- Impacts to GWMP roadway traffic;
- Opposition to use of GWMP by construction vehicles;
- Impacts to GWMP trees;
- Minimizing impacts to waterways and wetlands and fully restoring any impacted;
- Impacts to the Potomac Greens neighborhood;
- Traffic analysis for construction vehicles is inadequate in detail;
- Addressing construction impacts to roadway traffic through development of a Traffic Management Plan;
- Additional detail needed for disruptions to Metrorail Blue and Yellow Line service;
- Coordination of construction activities with those of nearby projects to reduce impacts to adjacent communities;

- Concern over impacts to the CSXT line, which could adversely affect VRE and Amtrak service by reducing their on-time performance and ridership; and
- Use of pollution prevention measures.

**Response:** The Draft EIS, Section 3.24, Construction Impacts, describes potential impacts and identifies broad minimization and mitigation measures for impacts such as those stated in the comments. All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision. At this stage of project design, further details regarding the levels, duration, and frequency of construction-related noise, vibration, and fugitive dusts are not available. Project development during the design phase will further define efforts to minimize construction impacts and, for unavoidable impacts, will define methods to restore resources to their prior condition.

Based on the types of construction activities, the need for a noise technician/acoustical engineer on site during construction is not anticipated. Construction activities will be conducted in accordance with the City of Alexandria Noise Control Code, which permits some nighttime construction activities. Due to the nature of the construction along live Metrorail tracks, some nighttime construction activities will be required. As the project will meet local noise control ordinances, no temporary relocations of noise- or vibration-sensitive receptors are anticipated. The project construction activities will consider using noise and vibration control measures, as stated in the Draft EIS. Specific measures could include use of alternative equipment to reduce noise and vibration, operating high noise and vibration sources as far away from sensitive receptors as possible, public notification programs to alert residents in advance of particularly disruptive activities, and complaint resolution procedures. No pile driving is anticipated, which will help minimize any vibration impacts.

On May 20, 2015, the City of Alexandria adopted Build Alternative B with Construction Access Option 2 (no access from the GWMP roadway) as the preferred alternative for the project, which will be carried forward in the Final EIS. Thus, no construction traffic will use the GWMP.

Regarding construction traffic on other roadways, further details of the mitigation measures will be developed during the final design phase of the project when details of the project components and the construction scenarios are finalized and a Transportation Management Plan (TMP) will be developed. The TMP will address construction activities related to the project as well as permanent station operations and will be prepared in coordination with VDOT, the City of Alexandria, and other agencies as applicable.

For construction of the preferred alternative, Build Alternative B, significant excavation activities with the potential to affect adjacent building foundations are not likely to occur near residences. Plans for construction excavation activities and measures to prevent settling impacts to adjacent structures will be confirmed during the final design phase of the project, when details of the project components and the construction scenarios are finalized.

Any clearing of vegetation on GWMP property would require a permit from NPS. Soils in impacted areas would be restored and the areas would be planted and seeded to restore them to a vegetated condition following the completion of construction activities. NPS parklands used for construction activities would be restored based on an NPS-approved planting plan.

With regard to disruptions of service along the Metrorail Blue and Yellow Lines, the Draft EIS, Section 3.24, Construction Impacts, subsection 3.24.3.2, page 3-208, discusses effects of the project construction on Metrorail operations. More details regarding the frequency, duration, and type of service outages will be confirmed during the final design phase of the project when the details of the project components and construction scenarios are finalized.

Regarding potential effects on VRE, Amtrak, and CSXT rail service: As a result of the City of Alexandria's adoption of Build Alternative B as the preferred alternative for the project on May 20, 2015, B-CSX Design Option will not be advanced further. Construction activities for the preferred alternative will be scheduled and coordinated with CSXT, Amtrak, and Virginia Railway Express to avoid or minimize impacts to operations of freight, commuter, and passenger rail services along the CSXT line.

The Final EIS construction impacts section will more clearly indicate the anticipated duration of construction. The project team will work with agencies that have jurisdiction over resources to determine if construction impacts are classified as temporary or permanent.

#### 5.2.5.10 Cultural Resources

7 comments were submitted that addressed cultural resources, specifically the historic status or character of the GWMP and other historic properties in the study area. Related comments regarding NPS Land Impacts and GWMP Aesthetics are addressed under those separate subtopics.

**Summary of Comments:** Most comments addressed the impacts of the project on the historic character of the GWMP:

- Station design needs to respect the historic character of the GWMP;
- Cumulative effects to historic resources, including those outside of the study area, are not adequately presented;
- The Draft EIS does not integrate the recently agreed upon mitigation measures to the GWMP that are described in the April 20 letter from NPS to the City of Alexandria; and
- Additional information on the status of GWMP and the appropriate standards to apply should have been drawn from the National Register Nomination Form and other information documents pertaining to the GWMP cited elsewhere in the Draft EIS.

**Response:** The Draft EIS, Section 3.9 Cultural Resources describes potential impacts to historic resources, such as the George Washington Memorial Parkway. Section 106 of the National Historic Preservation Act requires the Federal Transit Administration (FTA) to consider the effects of its actions on historic properties. FTA is responsible for compliance with Section 106 and initiated the review process with the Virginia Department of Historic Resources (VDHR). In addition to seeking the views of VDHR, FTA has invited certain organizations and individuals who have a demonstrated interest in the project, such as the National Park Service, to participate in the process. These organizations and individuals are referred to as Section 106 consulting parties, and review information relevant to the identification, evaluation and assessment of effects to historic properties that could result from the project. FTA and VDHR work with each other and the consulting parties to resolve project-related adverse effects to historic properties through a Memorandum of Agreement (MOA). The Final EIS will include details on proposed mitigation measures to address impacts to historic resources.

Section 3.23.1.2 of the Draft EIS defined the area of cumulative effects as the project study area. FTA determined the appropriate geographic bounds for consideration of reasonably foreseeable and past actions for the purpose of assessing cumulative effects. As such, potential indirect and cumulative effects within this area were taken into consideration for its effect determinations. In addition, the Virginia Department of Historic Resources (VDHR) concurred with the Area of Potential Effects (APE) for historic architecture and archaeology in July 2012. The APE is located within the project study area. The Old Town Alexandria and Park Grey Historic Districts are outside of the APE and the project study area. Thus, both historic districts are outside the analysis area for cumulative effects. The Potomac Yard Metrorail Station would not contribute to cumulative impacts to the Old Town and Parker Grey Historic Districts, as the additional growth and development occurring in Alexandria and the surrounding communities will happen in absence of the station.

The Final EIS, Section 4(f) Evaluation and Section 106 analysis will be updated to include the Net Benefit Agreement between the City of Alexandria and NPS, and any other mitigation agreements related to the project. Thus, changes in the proposed mitigation from the Draft EIS do not require a supplemental EIS based on 23 CFR 771.129.

The Draft EIS, Section 3.9, Cultural Resources, evaluates potential impacts to the GWMP and other historic resources listed on or eligible for listing on the National Register based on their listing criteria. Page 3-124, Line 1866 of the Draft EIS notes the use of the 1987 Cultural Landscape Report for the Mount Vernon Memorial Highway in the evaluation. Page 3-126, Lines 1946-1954 and Page 3-127, Lines 1198-2000 of the Draft EIS describe the Capper Cramton Act and relevance to the historic properties. The National Register of Historic Place (NRHP) nominations are cited in Section 3.9, Page 3-126, Lines 1966-1981 of the Draft EIS, and are summarized in Table 3-22.

Additional information on relevant documents related to the cultural significance of the GWMP is included in the Preliminary Historic Architectural Report, which is found in Volume II of the Draft EIS.

#### *Virginia Department of Historic Resources (VDHR) Review*

**Summary of Comments:** In general, the agency concurs with the statements made in the DEIS but is not ready to comment on effects to historic properties until a preferred alternative has been selected. Once a preferred alternative is selected, VDHR requests that FTA resume consultation under Section 106 to finalize the identification of historic properties.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. Coordination between FTA and VDHR regarding the Section 106 review process will continue, and will include resolution of the eligibility status of the Abingdon Apartments in a manner consistent with previous VDHR recommendations.

#### **5.2.5.11 Contaminated Materials**

**Summary of Comments:** Five comments on contaminated materials were received. The comments are summarized as follows:

- The U.S. EPA commented that the Draft EIS discusses possible contamination of the site on page 2-34 but indicates there is no contamination concern on page 3-7. It is also noted that the EIS should include additional information on sampling and handling of potentially contaminated materials;
- VDEQ reviewed the Draft EIS and conducted a search of its database files which indicated that no Resource Conservation and Recovery Act (RCRA) Hazardous Waste Facilities, Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Superfund sites, Formerly Used Defense (FUD) sites, Solid Waste Facilities, Voluntary Remediation Program (VRP) sites, or Petroleum Release Sites are located in close proximity to the project site;
- VDEQ provided some general comments regarding pollution prevention principles as well as requirements for testing and disposal of asbestos, lead based paint, soils, sediment, and waste. VDEQ also provided a listing of state and federal laws and regulations affecting hazardous waste management;
- VDEQ provided contact information for further guidance regarding petroleum contamination, asbestos containing materials and lead-based paint; and
- VDEQ indicated that any solid or hazardous waste generated or encountered during construction would need to follow applicable federal, state and local regulations for its disposal. VDEQ also described the rules and regulations relative to air compliance and permitting.

**Response:** The Section 2.5 Evaluation of Alternatives discussion of the potential to encounter contaminated soils will be clarified in the Final EIS by adding a statement that the “Alternatives would not result in long-term or permanent adverse effects due to risk mitigation and engineering controls and measures that would be used during construction,” consistent with Section 3.20, Hazardous and Contaminated Materials, page 3-190 of the Draft EIS. Additional information regarding sampling of materials will be provided in the Final EIS, including the results of a Phase II Environmental Site Assessment for the area of the preferred alternative. Additional information regarding handling of contaminated materials is provided in Section 3.24 Construction Impacts (pages 3-226 to 3-227 of the Draft EIS) and will be more clearly referenced in Section 3.20.

Further detail regarding these project elements will be developed and presented in the Final EIS and/or later design phases and provided to agencies and stakeholders, as appropriate. The Final EIS will also address any additional requirements or permits required for the removal of hazardous materials. The project team will coordinate with Virginia DEQ if more information on hazardous waste management is required.

#### 5.2.5.12 Cumulative Impact

**Summary of Comments:** US EPA commented that a more thorough review of the cumulative impacts of the project be prepared for the EIS that considers:

- Geographic limits beyond the study area;
- Potential indirect and cumulative effect in the project areas;
- Identification of resources that are likely to be adversely affected by multiple projects;
- Effects on sensitive resources, such as wetlands, that could require addition measures of protection; and
- More detailed review of measures related to flooding and climate change.

**Response:** FTA determined the appropriate geographic bounds for consideration of reasonably foreseeable and past actions for purposes of cumulative effects. As such potential indirect and cumulative effects were taken into consideration for its effect determinations. Further detail regarding these project elements will be further expounded upon and presented in the Final EIS.

#### 5.2.5.13 Demographics

**Summary of Comments:** One comment questioned whether the recent trends based on the US Census and reported in the Washington Post showing that population growth is slowing down in the Washington area and even declining in Alexandria and Arlington were considered in the Draft EIS.

**Response:** The Draft EIS, Section 1.3 describes the Project Need and discusses regional and local population growth in Alexandria. The Metropolitan Washington Council of Governments (MWCOC) Round 8.1 Cooperative Forecast estimated that the population of Alexandria would grow by 35 percent over the next 30 years. This growth would result in increased vehicle miles traveled (VMT) and congestion; the transportation study conducted as part of the North Potomac Yard Small Area Plan (NPYSAP) indicated that traffic congestion would increase on U.S. Route 1 even without the proposed development in Potomac Yard. Increasing the share of transit trips would help to manage congestion, reduce auto trips and emissions along transit corridors, and make efficient use of existing infrastructure.

#### 5.2.5.14 Ecosystems and Endangered Species

**Summary of Comments:** Two comments regarding Ecosystems and Endangered Species were received. One comment noted that the EIS should clarify whether there was coordination with the appropriate state and federal agencies regarding the potential for effects of the project on Threatened and Endangered Species, include documentation of this coordination, and include surveys conducted by qualified personnel following approved protocol. Another comment indicated that the Draft EIS should comply with Executive Order 13112 regarding invasive species.

**Response:** Draft EIS, Section 3.18.1.2, describes coordination with state and federal agencies. Page 3-182 of the Draft EIS discusses coordination with U.S. Fish and Wildlife Service (USFWS) and Virginia Department of Conservation and Recreation (VDCR), and Virginia Department of Game and Inland Fisheries (VDGIF). Threatened and endangered species were identified by using USFWS Information for Planning and Conservation (IPaC) online database system. Table 3-40 of the Draft EIS summarizes the Federally listed and state listed species that have the potential to occur within the study area. The analysis is described in more detail in the *Ecosystems and Endangered Species Technical Memorandum* in Volume II of the Draft EIS.

The Final EIS will include all related actions completed in regards to EO 13112. As described in the Draft EIS, Section 3.18.4, the development and implementation of an Invasive Species Management Plan, which addresses the removal and management of invasive species, is proposed. The Plan will address restoration of vegetation cleared during construction and installation of permanent plantings used in landscaping and screening the station site, including, for example, ensuring that restoration plantings and seed mixes consist of native stock and are free and clear of invasive or noxious weeds. Further details regarding the Invasive Species Management Plan will be developed in compliance with EO 13112 and presented in the Final EIS or Record of Decision.

Following listing of the Northern Long-Eared Bat in April 2015, FTA received direction from USFWS that the agency does not consider suitable habitat for the bat to be present in the City of Alexandria and to resubmit the IPaC list request for the project area that will confirm this. As of July 17, 2015, the IPaC Official Species List for the project area reported zero federally listed threatened or endangered species and no critical habitats. On September 3, 2015, USFWS issued its Online Project Certification Letter stating that its review of the project under the Endangered Species Act of 1973 was complete and that no additional coordination with the office was needed. As instructed by USFWS, the IPaC search will be run every 90 days until the project is complete. FTA will fulfill its responsibilities under Section 7 of the Endangered Species Act, and the Final EIS will include documentation of further agency coordination.

#### 5.2.5.15 Environmental Justice

**Summary of Comments:** U.S. EPA provided four comments regarding environmental justice (EJ). These comments are summarized as follows:

- All demographic information for the study area should be provided by Census Block to accompany Figure 3-10;
- The identification of minority communities should utilize 50% threshold to identify minority communities; and
- Greater detail should be provided regarding the exposure of at-risk populations to toxic substances, noise, vibration, fugitive dusts, truck traffic, and other activities that may be a result of the activities of this project.

**Response:** Additional details on the methodology used in the environmental justice analysis are included in the *Neighborhoods and Environmental Justice Technical Memorandum* in Volume II of the Draft EIS. The Final EIS will provide additional detail regarding the demographic information used to identify EJ communities. The environmental justice analysis, including how minority communities are identified, follows FTA guidance, which incorporates CEQ's guidance on EJ.

Section 3.24 of the Draft EIS describes construction impacts for the Build Alternatives for these impact sources, as follows:

**Toxic Substances (Lines 5133-5139)** – Recognized Environmental Conditions sites (RECs) are most likely to be encountered during construction activities. Temporary measures taken during construction, such as construction worker health and safety practices, management of excavated contaminated soil, and construction dewatering management and permitting would be implemented during construction to prevent exposure to potential contaminants at RECs.

Noise and Vibration (Lines 4918-4942) – The bulk of the construction would normally occur during daylight hours when most residents are not at home, when residents who are at home are less sensitive to construction activities, and when other community noise sources contribute to higher ambient noise levels. However, some construction activities would also occur during the nighttime and on weekends to complete the project sooner and reduce the overall duration of impact on the community. Whenever possible, construction activities would be conducted during the daytime and during weekdays and would be conducted in the City of Alexandria’s Noise Control Code. Construction activities are expected to impact only the closest residences and park users in adjacent neighborhoods (Potomac Greens and Potomac Yard) and any commercial properties in the vicinity of the station construction and Metrorail track realignment. Similarly, the three Build Alternatives and B-CSX Design Option would have the potential for noise increases along detour routes and truck haul routes. This analysis made conservative assumptions regarding construction noise in order to ensure that potential maximum adverse impacts are analyzed and disclosed consistent with NEPA requirements.

Fugitive Dusts (Lines 4094-4917) – Potential air quality impacts from construction of the three Build Alternatives and B-CSX Design Option would be similar and would include fugitive dust emissions resulting from demolition, ground excavation, material handling and storage, movement of equipment at the site, and transport of material to and from the site. These impacts would be temporary, and would affect only the immediate vicinity of the construction sites and their access routes. For each of the three Build Alternatives or B-CSX Design Option, to minimize construction-related effects on air quality, project construction activities would comply with Virginia Department of Environmental Quality (VDEQ) requirements for fugitive dust and emissions, as well as any local regulations.

Truck Traffic (4420-4534) – The roadway operations of Potomac Avenue, Potomac Greens Drive, Slaters Lane, U.S. Route 1, and the WMATA traction power substation access road would be affected during construction. Temporary lane closures would be required on public roads that have more than two lanes. Flagmen would be used on smaller two-lane roads to direct vehicle movements and allow construction vehicles to access the building sites. During construction, the number of vehicles accessing the site would vary daily. For the Build Alternatives, the number of vehicles on each access route would fluctuate depending on the activities associated with construction and time of day. At this early stage of project design, proposed construction techniques, types of equipment, and precise locations and durations of different activities within the project construction areas have not yet been defined sufficiently to quantitatively assess and compare the potential traffic effects. To minimize potential impacts from construction traffic, site access by construction vehicles could be strategically scheduled to minimize its occurrence. When construction is complete, any road infrastructure damaged by construction activity would be restored to its former condition.

As described in Section 3.24, Construction Impacts, best management practices will be used to avoid exposure to toxic substances (Lines 5139-5145) and safety risks due to truck traffic (Lines 4420-4458) and to minimize noise and vibration (Section 3.24.4.1), and fugitive dusts (Lines 4915-4917) that could affect residents, including at-risk populations, within the neighborhoods adjacent to the construction activities.

All mitigation measures for the Preferred Alternative will be specified in the Final EIS. At this stage of project design, further details regarding the levels, duration, and frequency of construction-related noise, vibration, and fugitive dusts are not available. Project development during the design phase will further define efforts to minimize construction impacts and, for unavoidable impacts, will define methods to mitigate impacts and restore resources to their prior condition.

The Final EIS will include a description of future public outreach, including how information will be disseminated to affected parties regarding project effects, such as noise and vibration, and proposed mitigation measures for them. A public communication plan will be established, providing information on public meetings, email and telephone contacts, and other relevant information regarding project construction and design. Further detail regarding these project elements will be developed and presented in the Final EIS and/or later design phases and provided to agencies and stakeholders, as appropriate.

### 5.2.5.16 Financial Resources

21 comments were submitted regarding financial resources, including estimated costs for the project. These comments are separated into several broad groups by sub-topics below.

#### *Disagreement or Concerns regarding Project Financial Information*

**Summary of Comments:** Comments disagreeing with financial information for the project, noting the project's large financial costs, or expressing other concerns related to financial resources for the project:

- Project costs are underestimated, citing other projects such as the Metrorail New York Avenue infill station project, as these types of projects typically have cost overruns;
- Additional development supported by the project will increase the number of City residents and services required for them and the overall tax burden as a result;
- Loss of Potomac Yard Shopping Center and its tax revenue is not accounted for in the City financial plan;
- Concerns over funding of maintenance costs for the station given WMATA's current maintenance backlog;
- Oppose use of special tax districts;
- Oppose tax increment financing;
- Project will result in unacceptable level of debt for the City;
- Financial information needs to break out funding by year for both the station cost and WMATA operating subsidy;
- Move project closer to Arlington County and get money from the County;
- Actual Dulles Metrorail extension financing and costs are very different than what was presented in the EIS for the project; and
- Project does not consider financial and economic costs.

**Response:** The Draft EIS, Chapter 5, discusses project costs and funding, based on information current as of March 2015. Section 5.1.1, Capital Cost Estimate, describes the methodology and assumptions for the cost estimates. Included in the estimates for each alternative is a contingency cost category, which accounts for potential uncertainties that may increase costs.

The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria. As discussed in Chapter 5 of the Draft EIS, the project would be financed by a variety of funding sources through a Potomac Yard Metrorail Station Fund, which includes net new tax revenues and developer contributions as well as special tax district funding. The potential funding sources do not include tax increment financing. In addition, the City continues to evaluate opportunities for Federal and state funds. The Station Fund revenues will be accounted for separately from other City general revenues.

The City of Alexandria's detailed financial feasibility analysis of annual capital and operating costs, annual project revenues, estimates of Citywide economic benefits, and factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)).

With regard to other major capital needs of the Metrorail system, including addressing deferred maintenance, Metro's Momentum strategic plan lays out recommendations and funding needs to address them through the year 2025. As described in the Draft EIS, Section 5.2.1, the new station would add system-wide operating costs to Metrorail. The majority of the operating funds come from the annual operating subsidy provided by member jurisdictions of the WMATA Compact.

With regard to the existing shopping center, the Draft EIS, Section 3.4 Land Use and Zoning, states the impacts of the Build Alternatives on surrounding uses. Neither Build Alternative A nor Build Alternative B would displace the existing shopping center or movie theater. Under Build Alternative B, the northern station entrance would touch down on a portion of the shopping center parking lot that, in the future, is planned for redevelopment and open space as part of a dense mixed-use development incorporating a Metrorail station entrance. The Draft EIS, Section 2.1, Local Planning Process, summarizes City of Alexandria small area planning for North Potomac Yard, which includes the existing Potomac Yard Shopping Center. The City's adopted North Potomac Yard Small Area Plan envisions the replacement of the retail center with a high-density, transit-oriented neighborhood, including 7.525 million square feet of office, retail, residential, and hotel use.

### **Agreement with Project Financial Information or Noting Financial Benefits**

**Summary of Comments:** Comments agreeing with financial information for the project or noting the project's financial benefits:

- List of Commonwealth of Virginia funding for the project;
- Project will generate additional jobs and economic benefits in the City and surrounding areas;
- Project will help City balance its tax base by supporting commercial development;
- Project will help City compete for future Federal offices; and
- Support funding strategy that uses multiple sources.

**Response:** The Draft EIS, Chapter 5, discusses project costs and funding, based on information current as of March 2015. The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria.

The City of Alexandria's detailed financial feasibility analysis, including estimates of Citywide economic benefits, and factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)).

### **Questions Regarding Financial Resources**

**Summary of Comments:** Specific questions on financial resources for the project:

- Clarification requested on details of FTA grant for the NEPA study, including whether FTA provided the grant to the City, which agency issued the contract for the consultant and why, and conflict of interest documentation for the contractor;
- Clarification requested on future FTA funding sources to be pursued for the project; and
- Question regarding FTA involvement in NEPA process if project could be implemented without FTA funding.

**Response:** The City of Alexandria received a \$1 million FTA grant, which was used to fund the NEPA study. WMATA retained the consultant that is preparing the EIS; WMATA's costs are reimbursed by the City of Alexandria. Although FTA may provide financial assistance for technical work, FTA relies on the applicant, in this case the City of Alexandria, to obtain the contractor. The project sponsor and joint-lead agency (City of Alexandria) selected and is overseeing the contractor preparing the EIS in accordance with 40 CFR 1506.5(c). The disclosure statement relating to conflict of interest is provided in **Appendix G, Reference Materials**, of this report.

Section 1.1, Page 1-1, Lines 7-8 of the Draft EIS identifies FTA's role in the project, "Because the project has the potential to utilize Federal funds, FTA is the lead federal agency for the project." As the project is still advancing, the City of Alexandria (the project sponsor) will continue to pursue Federal funds, as well as funding from other sources. For the Draft EIS, the City of Alexandria assumes at least a partial contribution of federal funds would be used to construct the Metrorail Station. This funding approach is similar to all other Metrorail facilities that have been constructed since the transit system was originally built in the 1970s. The funding approach will be updated in the Final EIS.

### **Suggestion of Lower-Cost Alternatives**

**Summary of Comments:** Comments suggesting lower-cost alternatives to the project:

- Investing in more efficient bus system would be more cost-effective and easier to change.

**Response:** The Draft EIS Section 1.3, Project Purpose and Need, describes the role of bus services such as Metroway in the project study area and the need for new transit services, in addition to Metroway, to accommodate the area's forecast increase in travel demand and to provide a direct access point to the regional transit system within Potomac Yard.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)).

#### **5.2.5.17 Flooding and Stormwater Management**

**Summary of Comments:** 5 comments were submitted expressing concerns regarding the project's effects on floodplains and stormwater runoff. The following issues were raised related to all alternatives:

- No discussion of green roofs or traps for storm runoff filtration;
- The base flood level will soon be raised (via Executive Order) from 10 to 12 or 13 feet. We are building behind the curve;
- Daingerfield Island is in a FEMA designated floodplain and performs excellent buffering action right now - it should be retained as such;
- More detail should be provided regarding floodplain mitigation measures;
- Question regarding whether project would raise the flood elevation in adjacent areas; and
- Comments from the Virginia Department of Environmental Quality (VDEQ) noting applicable state regulations and permitting requirements.

**Response:** The Draft EIS, Section 3.15, Floodplains, describes potential impacts to floodplains and requirements for permitting and mitigation of any impacts. The project will comply with federal, state and local regulations and permitting requirements relating to surface waters and wetlands. Project designs and specifications for these elements will be developed during detailed design phases and will be coordinated with all applicable agencies.

The Draft EIS, Section 3.19, Sustainability, states that the project will be designed consistent with the local sustainability requirements. Station design features that comply with green building policies and objectives, such as LEED Silver Certification, would be developed during detailed design phases of the project. Low Impact Development (LID) design may also be considered during later design phases including features such as bioretention facilities and permeable pavement.

The Draft EIS, Section 3.15, Floodplains, states that none of the three Build Alternatives or B-CSX Design Option is expected to raise the 100-year Base Flood Elevation within the project study area if constructed within the flood zones, which are associated with the Potomac River. This statement is based on the location of the large surface area of the Potomac River relative to the station area.

The floodplain analysis will be updated in the Final EIS to reference the new Executive Order 13690. Further detail regarding these project elements will be developed and presented in the Final EIS and/or later design phases and provided to agencies and stakeholders, as appropriate.

### 5.2.5.18 George Washington Memorial Parkway (GWMP) Aesthetics

**Summary of Comments:** 9 comments were received regarding the aesthetic impact of the project on the GWMP. Comments that applied to multiple alternatives with visual impacts on the GWMP included the following:

- Opposition to project due to adverse impacts on GWMP visual aesthetics;
- Concern that mature trees along the GWMP will be cleared;
- Recommend mitigation measures, including native vegetation planting and refinements to station building design, to reduce visual impacts;
- Recommend consideration of views from Potomac Yard to the monumental core of DC as well as views from the GWMP;
- Recommend coordination with the National Capital Planning Commission on mitigation measures;
- Impacts from construction vehicles on the GWMP;
- Nighttime impact to GWMP visual resources needs to be analyzed;
- Potomac Yard development will cause more significant impacts to views from the GWMP than the proposed station; and
- Project does not incorporate any value for the loss of scenic vistas.

**Response:** As stated in the Draft EIS, Section 3.8 Visual Resources and Section 3.9 Cultural Resources, measures to minimize and mitigate the project's visual impacts to the George Washington Memorial Parkway will be developed in coordination with the National Park Service, City of Alexandria, Virginia Department of Historic Resources, and other consulting parties for the review of the project for consistency with Section 106 of the National Historic Preservation Act. These measures will be described in the Final EIS and implemented through a Memorandum of Agreement as part of the NEPA and Section 106 processes.

The Draft EIS, Section 3.8.4, Mitigation, states that station building design and materials will be refined during later project phases to mitigate impacts on visual resources. In addition to the National Park Service and the Virginia Department of Historic Resources, consulting parties with a demonstrated interest in preserving the character of the GWMP, including the National Capital Planning Commission (NCPC), will also be involved in discussions on station design and materials. NCPC approval of the project is also necessary based on provisions provided by the Capper Cramton Act.

Regarding construction vehicles on the GWMP roadway, the City of Alexandria on May 20, 2015 adopted Build Alternative B with Construction Access Option 2 (no access from the GWMP roadway) as the preferred alternative for the project, which will be carried forward in the Final EIS. Thus, no construction traffic will use the GWMP. The Final EIS will provide additional details on proposed mitigation measures for impacts to the George Washington Memorial Parkway, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsible agencies.

The Final EIS will include a quantitative description of evening and winter (leaf-off) visual impacts of the No Build Alternative and Preferred Alternative, based on a single source of photo renderings. As noted in the Draft EIS in Section 3.8.4, Mitigation, station building design, and materials will be refined during later project phases to mitigate impacts on visual resources. These building elements will include station lighting, which will be refined during later project phases to minimize visual impacts to the GWMP based on industry standards for minimizing light spillover while maintaining adequate safety and security for station users and employees. Signage impacts will be mitigated as part of the Net Benefit Agreement between the City of Alexandria and NPS, with relevant information included in the Final EIS.

The Draft EIS, Section 3.8, Visual Resources, evaluates potential impacts to study area visual resources, including GWMP viewsheds. The Final EIS will include additional information on the value of scenic vistas and additional measures to mitigate impacts to viewsheds. Key architectural design refinements, such as modifications to the retaining wall, fill areas around the station, and resulting station height relative to grade level, will be included in the FEIS and its impact evaluations. Additional minor refinements proposed for mitigation of project impacts will be specified in the Record of Decision

### 5.2.5.19 GW Parkway Environmental Mitigation

**Summary of Comments:** Two comments were received regarding impacts to natural resources within the George Washington Parkway:

- Daingerfield Island is part of the designated floodplain and should continue to serve as a buffer protecting other areas from flooding; and
- The National Capital Planning Commission (NCPC) indicates that it will defer to NPS to identify potential mitigation measures if Alternative B or Alternative D is selected as the preferred alternative, requiring property transfers or easement modifications between the City of Alexandria and NPS.

**Response:** The Final EIS will provide additional details on proposed mitigation measures for impacts to the George Washington Memorial Parkway, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsible agencies. Key architectural design refinements, such as modifications to the retaining wall, fill areas around the station, and resulting station height relative to grade level, will be included in the FEIS and its impact evaluations. Additional minor refinements proposed for mitigation of project impacts will be specified in the Record of Decision.

### 5.2.5.20 Land Use

**Summary of Comments:** 9 comments were received regarding land use associated with the project, including the following issues and concerns:

- Metrorail station is needed to support planned North Potomac Yard redevelopment, especially office and commercial uses;
- Redevelopment resulting from the Metrorail station will make the area more expensive for residents;
- Concern about loss of open space in City;
- Increased development may benefit City economically but does not enhance the quality of life;
- Opposition to planned 22-story buildings;
- Planned redevelopment will increase traffic; and
- The planned highest-density development identified for North Potomac Yard is appropriate density to be located close to the region's core.

**Response:** The Draft EIS, Section 2.1, Local Planning Process, and Section 3.5, Consistency with Local Plans, describe the City of Alexandria's plans for the Potomac Yard area, including the types and intensities of development and open space recommended in adopted plans.

With regard to land use in proximity to the alternative station locations, the Draft EIS, Section 2.5.3, Support for Project Purpose and Need, assessed the number of residents within 1/2 mile and number of employees within 1/4 mile of the proposed station entrances in 2040 based on approved development plans. In addition to the stations' proximity to planned development blocks, the estimates also account for the different levels of development permitted under each alternative based on approved plans and the resulting differing densities of development blocks within North Potomac Yard under each of the alternatives.

### 5.2.5.21 Metroway and Other Bus Service

11 comments were received regarding area bus services, including Metroway, local bus services, and their relationship to the project.

#### *General Comments*

**Summary of Comments:** General comments included the following:

- Consider adding off-street bus bays to the station, or, if not feasible, on-street bus bays could be constructed on Potomac Avenue, to accommodate passenger stops and layover areas;

- Station bus bays should have real-time arrival information as well as route/system maps, fare, schedules, and customer service information; and
- Consider routing area bus services to have stops at the station entrance.

**Response:** Potential refinements to the designs and locations of on-street bus stops along Potomac Avenue to serve the station and facilitate transfers between Metrorail and bus services, including Metroway, will be considered in coordination with WMATA, the City of Alexandria, and bus service providers during later project design phases.

#### *Metrorail Station Not Needed due to Metroway*

**Summary of Comments:** Other comments stated that the Metroway Bus Rapid Transit line can adequately serve transit demand in the corridor and that the proposed Metrorail station is not needed.

**Response:** The Draft EIS Section 1.3, Project Purpose and Need, describes the role of Metroway in the project study area and the need for new transit services, in addition to Metroway, to accommodate the area's forecast increase in travel demand and to provide a direct access point to the regional transit system within Potomac Yard.

#### 5.2.5.22 Natural Resources

**Summary of Comments:** Eleven comments regarding natural resources were received. The comments are summarized as follows:

- Virginia Department of Environmental Quality (VDEQ) coordinated a review of the project by all applicable state agencies. VDEQ concludes that the project is unlikely to have significant effects on ambient air quality, water quality, wetlands, or historic resources. VDEQ also invited the City of Alexandria, Northern Virginia Regional Commission, Marine Resources Commission, Virginia Department of Game and Inland Fisheries, and Virginia Department of Agriculture and Consumer Services to comment on the project;
- Virginia Department of Conservation and Recreation Division of Natural Heritage (VDCR-DNH) concludes that the project would not adversely impact natural heritage resources nor would the project affect any threatened or endangered plant and insect species or State Natural Preserves under its jurisdiction;
- VDCR-DNH recommends coordination with the Virginia Department of Game and Inland Fisheries (VDGIF) regarding threatened and endangered species, trout streams, and anadromous fish waters; additional co-ordination with VDCR-DNH is required every six-months or if the scope of the project changes;
- VDCR indicated that its remaining departmental divisions (other than DNH) have no comments regarding the scope of the project;
- Virginia Department of Transportation (VDOT) provided contact information for questions regarding its comments on the project and cited the sections of the Virginia Code establishing the Agency's authorities over activities of the department;
- VDEQ states that the draft Federal Consistency Determination (FCD) regarding Coastal Zone Management be updated as necessary and provided as part of the Final EIS or independently for its review;
- Virginia Department of Forestry (VDOF) notes that B-CSX Design Option would have the least impact on forest resources, have a minimal impact to nearby NPS land and views, and avoid existing green corridors.

**Response:** Further coordination with VDEQ and other applicable Federal and state natural resource agencies will occur as needed, including submission of an updated Federal Consistency Determination (if necessary) in response to Coastal Zone Management Act requirements.

The Draft EIS, Section 3.18, Ecosystems and Natural Habitat, discusses the potential impacts of the project alternatives to forest resources and identifies potential mitigation measures. Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. The Final EIS will define mitigation measures for the preferred alternative in more detail.

### 5.2.5.23 NEPA Process and Methodology

8 comments were received regarding the NEPA process and methodology for the EIS.

#### *General Comments*

**Summary of Comments:** Comments expressed the following concerns with the overall sufficiency of the Draft EIS document and its analyses:

- Draft EIS should have included information from the agreement between NPS and the City of Alexandria, which was made shortly after release of the Draft EIS;
- Document does not meet the standards of NEPA or implementing guidance by not adequately assessing the direct, indirect, and cumulative impacts of the project or indicating the participation of relevant approval agencies; as a result, a supplemental EIS is needed;
- Review process has been thorough and well-balanced;
- Induced development and resources affected are not adequately described; and
- Visual impact analysis is explained using convoluted technical jargon, and, as a result, readers and decision-makers are not able to discern the real scope and extent of impacts.

**Response:** The EIS is being prepared in accordance with CEQ regulations 40 CFR 1500-1508. The direct impacts of the project are described in Chapter 3 and specifically Sections 3.1 to 3.22 as well as 3.24 which addresses construction impacts. Indirect impacts (effects) as defined by 40 CFR 1508.8(b) are analyzed in Section 3.23 of the Draft EIS.

The Final EIS will incorporate any new information affecting the project since the publication of the Draft EIS, including details of the Net Benefit Agreement between the City of Alexandria and NPS, and will be released for public review. Any additional agreements made between the cooperating agencies will be included in the Final EIS and is required as part of the Record of Decision (ROD).

The Draft EIS as prepared meets the statutory requirements pursuant to 23 CFR 771.123. Numerous federal agencies with potential jurisdiction over the project were invited to be cooperating agencies for the project in accordance with Section 6002 of SAFETEA-LU and 40 CFR 1501. No other federal agency claimed jurisdiction by law for the project in accordance with 40 CFR 1501.6. The Draft EIS, Appendix B lists Cooperating and Participating Agencies for the project. Therefore, a supplemental EIS is not anticipated.

The Draft EIS notes in numerous sections reviews and coordination by other agencies, as well as required agency reviews, coordination, and approvals necessary for the project. Section 4.1 of the Draft EIS discusses agency coordination completed on behalf of the project. Appendices D and F of the Draft EIS include agency consultation related to Section 4(f) and Section 106 respectively. NPS has served as a cooperating agency for all NEPA related issues.

With regard to the visual resources analysis:

- The Draft EIS, Section 3.8, Visual Resources, provides an evaluation of the project using the Federal Highway Administration's "Visual Impact Assessment Methodology for Highway Projects". This methodology provides objective criteria for evaluating visual resources and potential effects. Section 3.8.1

describes the methodology used in the assessment to provide background to the general reader to be able to understand the assessments of the Affected Environment and Environmental Consequences in the remainder of Section 3.8.

With regard to indirect and cumulative effects:

- The Draft EIS, Section 3.23, Secondary and Cumulative Effects, and subsections 3.23.2.1 Recent and Planned Development in Alexandria Potomac Yard and 3.23.3 Secondary Effects describe potential induced development for the project alternatives. The methodology is described in Section 3.23.1.
- The Draft EIS considered the induced development potential in the Potomac Yard area of the City of Alexandria, a former railroad yard, and specifically the sub-areas shown in Figure 3-7 of the Draft EIS. Development would be focused west of the railroad tracks. No induced development would occur on NPS land due to the project. The City further subdivides Potomac Yard into Coordinated Development Districts (CDDs). The amount of development in CDD#19 (North Potomac Yard) is contingent on the Metrorail station project.
- The Draft EIS, Section 3.23 qualitatively evaluates the impacts of induced development due to the project alternatives in accordance with 40 CFR 1508.8(b). Overall the induced development is expected to be similar in intensity among all the build alternatives. The pace of development and construction activities will vary based on a variety of factors including long-term economic conditions and demand potential external to the project. Resources that would be affected by the induced development, and discussed in Section 3.23 include long-term traffic and transit ridership, new demands for community facilities due to increases in the residential and employee population, changes in the visual character due to building heights, and noise impacts.

### *Development of Alternatives*

**Summary of Comments:** Various comments addressed the screening of alternatives, description of alternatives, and process for selection of the preferred alternative:

- The City cannot select the preferred alternative; in accordance with CEQ NEPA regulations, determining the NEPA preferred alternative is a Federal agency responsibility;
- City staff should have delayed its recommendation for the preferred alternative until after all comments from citizens were considered;
- The screening process contains flaws in evaluating plans for George Washington Memorial Parkway (GWMP) as “Zoning and Local Plans;”
- The screening process for alternatives does not present a realistic look at alternatives available to decision-makers and the past planning processes and criteria for the station location, but falsely develops alternatives solely on the City of Alexandria’s current goal, maximized development, as the criterion for the screening process;
- Unclear why the Draft EIS included Alternative B as a reasonable alternative, despite NPS objections, which are not sufficiently described in the Draft EIS; and
- No Build Alternative and its impacts, direct and indirect, are not adequately described.

**Response:** Member agencies of the Project Management Team (PMT) were integral to the development of the alternatives at each phase of the project. A screening workshop was held on June 30, 2011 with the PMT and additional representatives of each agency on the PMT - FTA, City of Alexandria, NPS and WMATA. Following the workshop, a screening alternatives technical memorandum was prepared and distributed for review, comment and approval by the PMT. The alternatives carried forward to the EIS were identified through this screening process. The Draft EIS, Section 2.2, describes the screening process, and Volume II of the Draft EIS, contains the detailed *Initial Screening of Alternatives* report.

The Draft EIS, Section 2.1, describes the local planning process for the project. The plans used in the screening process for the second criterion regarding consistency with land use and development plans are listed in the *Initial Screening of Alternatives* report (page 12), which is referenced in Section 2.2 and included in Volume II of the Draft EIS. These plans comprise the City of Alexandria Potomac Yard Coordinated Development District (CDD#10) Concept Plan and the North Potomac Yard Small Area Plan. Consistency of alternatives with GWMP governing documents was evaluated in the Draft EIS and described in detail in various sections of Chapter 3, Environmental Consequences.

NPS was integral to the development and identification of reasonable alternatives that were carried forward to the EIS. NPS participated in the screening workshop held in June 2011. NPS staff reviewed and approved the *Initial Screening of Alternatives* report which culminated the efforts to identify alternatives. NPS staff reviewed drafts of the Draft EIS at multiple points in its preparation and approved its release.

NPS correspondence with FTA prior to release of the Draft EIS, regarding use of the George Washington Memorial Parkway by the project, is included in the Draft EIS as Appendix H, which is referenced in Section 3.24, Construction Impacts. For potential project effects to NPS property and resources within it, the Draft EIS, Chapter 3, Environmental Consequences, describes NPS policies for all relevant resources. Broad mitigation strategies for impacts to the George Washington Memorial Parkway and the Greens Scenic Area easement were presented in the Draft EIS, Chapter 3. NPS does not object to Build Alternative B based on the tentative agreement reached with the City of Alexandria, as noted in a letter to the City of Alexandria dated April 20, 2015, which is provided in **Appendix G, Reference Materials** of this report. The letter concludes, "We believe that the City's current proposal appears to mitigate those impacts sufficiently so that NPS would not object to the identification of Alternative B as the locally preferred alternative." The Final EIS will be updated to incorporate details and mitigation measures of the Net Benefit Agreement between the City of Alexandria and NPS.

In the April 24, 2015 *City of Alexandria's Staff Recommendation for the Preferred Alternative*, Build Alternative B is recommended as the preferred alternative "based on its ability to enable the high-density mix of uses envisioned for North Potomac Yard, and the associated community, transportation, and economic development." On May 20, 2015 the City of Alexandria City Council voted unanimously in selecting Build Alternative B as the preferred alternative. The Final EIS will provide additional details on proposed mitigation measures for impacts to the George Washington Memorial Parkway, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsible agencies. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

With regard to the No Build (no action) Alternative, refer to Section 2.3 of the Draft EIS which describes assumptions used for the No Build Alternative in detail, including assumptions used for the traffic and transit analysis. The study area for the No Build Alternative is shown in Figure 1-1 of the Draft EIS and described in Section 1-1. As described in Section 2.3, the no build (no action) alternative includes the existing transportation network, plus all of the committed projects within the study area. "Committed projects" are those projects listed in the region's Constrained Long Range Plan and Transportation Improvement Program. The indirect effects analysis in Section 3.23 makes further long-term assumptions about land use development in the study area based on the North Potomac Yard Small Area Plan adopted by the City of Alexandria. Section 3.4.3.8, describes the amount of development assumed for the No Build Alternative. The No Build Alternative is presented properly in the Draft EIS for NEPA purposes; FTA assumes the project would not occur in the absence of Federal funding.

The Draft EIS, Section 2.2, describes the screening process used to select the alternatives carried forward for detailed evaluation in the Draft EIS. As described in the section, the initial screening of alternatives used three criteria: Responsiveness to project purpose and need, Consistency with land use and development plans, and Technical feasibility. As described in Section 2.2.2.2, only a small subset (5 out of 36) alternatives initially considered were screened out due to their basic incompatibility with plans for the Potomac Yard - these alternatives consisted of at-grade Metrorail lines running through Potomac Yard (see Figure 2-1). As noted, these alternatives would have made the implementation of a high-density, pedestrian-friendly mixed-use community in Potomac Yard impossible by requiring at-grade crossings (bridges or tunnels) over the Metrorail right-of-way.

Table 2-4 Evaluation of Alternatives is contained within Section 2-5, Evaluation of Alternatives, which is a summary comparison of the alternatives evaluated in detail in the Draft EIS, rather than part of the screening process that was used to select alternatives for detailed consideration in the Draft EIS. As described, this section is intended to provide a broad summary of the detailed information presented in Chapter 3, Environmental Consequences. In the Final EIS, Table 2-4 will be revised to reference this topic as "Zoning and Plans" to avoid confusion that the plans are necessarily adopted by local governments, as the GWMP is a unit of the National Park Service under the United States Department of the Interior. These plans and the assessment of consistency are described in more detail in Section 3.5, Consistency with Local Plans. All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision. Further detail regarding mitigation measures will be developed in later design phases and provided to agencies and stakeholders, as appropriate.

The Draft EIS, Section 3.5, Consistency with Local Plans, subsection 3.5.3.3 discusses the consistency of Build Alternative B with planning documents related to the GWMP. With regard to the technical memoranda provided in Volume II of the Draft EIS, the introduction to the volume notes that the technical memoranda were completed in February 2013, after which time some additional and updated analyses were completed for the B-CSX Design Option and Build Alternatives A, B, and D. The additional and updated results are presented in Volume I of the Draft EIS. Additional clarity will be provided by updating Table 3-3 in the Land Use, Zoning, and Consistency with Local Plans Technical Memorandum to reflect the results presented in Table 2-4 and the Draft and Final EIS. Consistency with Local Plans (Section 3.5 in the Draft EIS) in the Final EIS will also include and assess the Organic Act similar to the assessment of the Capper Cramton Act.

As the lead local agency, the City of Alexandria can select a preferred alternative at any point during the NEPA process. The City of Alexandria has selected Build Alternative B as the Preferred Alternative. FTA and the City of Alexandria, as the lead agencies, will identify the Preferred Alternative in the Final EIS, in accordance with 23 CFR 771.125(a)(1). NPS is a cooperating agency because of the potential of the project to impact natural and cultural resources of the George Washington Memorial Parkway, but does not determine the selection of the Preferred Alternative.

### *Roles of Agencies Involved*

**Summary of Comments:** Comments expressed concern that the roles of various agencies, including lead and cooperating agencies, as well as the City of Alexandria and other federal agencies, were unclear in the Draft EIS.

- The relatively focused project purpose statement appears to be more of a City purpose than an FTA or NPS purpose;
- Federal action and FTA role as the lead Federal agency are not sufficiently defined;
- Need to describe the proposed action of NPS;
- If the proposed action is for FTA to provide partial funds and the City would construct the station if the funds were not approved, then the No Build Alternative and much of the DEIS are not proper;
- Need to reference the application for FTA action, which in this case would be an application for FTA funding;
- Question whether FTA and NPS participated in the screening process to develop the reasonable alternatives;
- Need to describe NPS's planned NEPA compliance for the proposed project and provide notification regarding future NPS actions;

- It is not clear how the Federal approval process will be conducted. Each agency has its own mission and, it is possible that the same alternative may not be selected by all Federal agencies. Please describe the project's planned review and approval process for the various Federal agencies;
- Describe the Washington Metropolitan Area Transit Authority (WMATA) and its role in the proposed project;
- Describe the U.S. Army Corps of Engineers (USACE) NEPA compliance process for the proposed approval of the 404 permit;
- Please confirm no other Federal agency besides FTA, NPS, and USACE action will be required to approve this project; and
- Need to confirm if Federal approval would be required for the relocation of the CSX track, which would be an additional Federal action under NEPA.

**Response:** The EIS is being developed and will be approved in accordance with federal regulation 40 CFR 1500-1508 and 23 CFR 771. Prior to scoping, FTA determined that the action had the potential to significantly affect the environment; thus, the agency determined that an Environmental Impact Statement was the appropriate Class of Action. This decision was made in accordance with 23 CFR 771.115(a). The Draft EIS, Final EIS, and Record of Decision (ROD) will be made available for public review and comment in accordance with federal regulation. FTA and NPS will separately review the Final EIS and, pending their review and acceptance, NPS will issue its Record of Decision for the EIS, after which FTA will issue its own Record of Decision.

The proposed federal action is to provide a portion of the funding to construct a Metrorail station; thus, FTA's federal action for the project relates to funding. FTA will not be directly responsible for construction of the station. The City of Alexandria will be responsible for the construction of the station. WMATA will accept and operate the Metrorail Station. The Draft EIS, Section 1.1, states that, "Because the project has the potential to utilize Federal funds, FTA is the lead agency for the project." FTA assumes the project would not occur in the absence of Federal funding.

NPS is serving as a cooperating agency for the project as described in the Code of Federal Regulations, 40 CFR 1501.6 and Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act A Legacy for Users Act (SAFETEA-LU). NPS actions for the project include the transfer of lands from and to federal ownership for construction of the station. The transfers would be subject to approval by NPS and an equal value exchange of lands or interests in land under 54 U.S.C. 102901, and would also be contingent on the successful implementation of a Section 106 Memorandum of Agreement (MOA) developed for the Preferred Alternative. NPS could also approve the use of regulated wetlands and floodplains on NPS land in accordance with Director's Orders 77-1 and 77-2. A Wetland and Floodplain Statement of Findings is currently being prepared by NPS in accordance with the Director's Orders. The Statement of Findings will be published with the Final EIS. General NPS documentation is available at the Planning, Environment and Public Comment website: <http://parkplanning.nps.gov/>. George Washington Memorial Parkway related announcements are available on the park website: <http://www.nps.gov/gwmp/getinvolved/planning.htm>

A Project Management Team (PMT) was convened in the Spring 2011 for the development of the EIS and in accordance with Section 6002 of SAFETEA-LU. PMT meetings were held on a bi-weekly basis; the group is made up of representatives of FTA, City of Alexandria, NPS, and WMATA. The PMT has been integral to the development of the EIS at each phase, including the development and approval of the purpose and need statement for the project. Both FTA and NPS approved the project purpose described in the Draft EIS.

Numerous federal agencies with potential jurisdiction over the project were invited to be cooperating agencies for the project in accordance with Section 6002 of SAFETEA-LU and 40 CFR 1501. No other federal agency claimed jurisdiction by law for the project in accordance with 40 CFR 1501.6. The Draft EIS, Appendix B lists Cooperating and Participating Agencies for the project. The United States Army Corps of Engineers (USACE) may conduct an Alternatives Analysis to determine the Least Environmentally Damaging Practicable Alternative (LEDPA) prior to completion of the Final EIS.

With regard to USACE and other agencies regulating wetlands and Waters of the U.S.:

- The U.S. Army Corps of Engineers-Norfolk District has completed a formal Jurisdictional Determination (JD) for wetlands located within the project study area. A permit will be sought for wetland impacts resulting from the Preferred Alternative only and after the design has advanced following a Record of Decision (ROD). Notification for permit-related hearings are published on the VDEQ web site: <http://www.deq.virginia.gov/Programs/Water/WetlandsStreams/PublicNotices.aspx>
- For details of project permitting with USACE under Section 404 of the Clean Water Act, please refer to the appropriate Federal regulations regarding USACE procedures.
- All NPS actions with the potential to have adverse impacts on wetlands must also comply with Director's Order 77-1. In the case where both NPS and USACE procedures apply, coordination with the appropriate USACE office will be initiated early in the process to reduce potential duplication of effort, and the NPS processes would be initiated at the design phase of the project. Furthermore, the NPS will require a Statement of Findings with the Final EIS before the Record of Decision is signed. The Statement of Findings will require its own public review period.
- USACE, Virginia Department of Environmental Quality (VDEQ), Virginia Marine Resources Commission (VMRC), and NPS would further define mitigation measures specified in the Final EIS and/or Record of Decision, as part of the joint permit application process and NPS Director's Order 77-1, where appropriate. If wetland compensation is necessary, the wetland restoration proposal will meet the compensation requirements of both the USACE and the NPS processes as well as EO 11990 for no net loss.

With regard to Federal Coastal Zone Management Act (CZMA) compliance:

- FTA is responsible for CZMA compliance. FTA submitted a Federal Consistency Determination to the Virginia Department of Environmental Quality (VDEQ) Coastal Zone Management Program (CZMP) in December 2012 and submitted the Draft EIS to VDEQ in March 2015. VDEQ provided comments on the Federal Consistency Determination in January 2013 and for the Draft EIS in April 2015.

With regard to the CSXT railroad:

- As a Class I Freight Railroad, CSXT operations are governed by the regulations in 49 CFR 200 through 272 (Federal Railroad Administration) and 49 CFR 1000-1199 (Surface Transportation Board). Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Build Alternative B does not require the relocation of CSXT tracks, but the project will continue to coordinate with CSXT throughout the design phase about the specifications of the pedestrian bridges over CSXT right-of-way. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

With regard to WMATA:

- The agency was created by an interstate compact in 1967 to plan, develop, build, finance, and operate a balanced regional transportation system in the national capital area. WMATA is serving as a cooperating agency for the project, as stated in the Draft EIS introduction.

### **Environmental Protection Agency (EPA) Review**

**Summary of Comments:** EPA reviews all EIS documents in a required role supporting Federal agency compliance with NEPA. EPA rated the DEIS an EC-2 (Environmental Concerns/Insufficient Information), based on its rating system (available on the EPA website), which indicates that the agency has environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts. Specific areas of concern included environmental justice, children's environmental health, cumulative impacts, climate change and community impacts.

**Response:** Responses to specific EPA comments are provided separately for environmental justice, children's environmental health (within NEPA Process and Methodology), cumulative impacts, climate change, community impacts, noise, vibration, water quality, wetlands and Waters of the U.S., and construction impacts.

The Draft EIS, Section 3.7.1.1, page 3-42, Lines 912 to 924 described the methodology used for the Environmental Justice assessment. The methodology used is fully consistent with FTA guidance (which incorporates CEQ's guidance) on environmental justice.

The Draft EIS, Section 3.6.3.2, page 3-41, Lines 870-873, describes the analysis related to Executive Order 13045 on Children's Health and Safety, and additional information is provided in the *Neighborhoods and Environmental Justice Technical Memorandum* in Volume II of the Draft EIS. No negative impact to concentrations of children or children-serving facilities was identified due to any of the Build Alternatives.

The Draft EIS Section 3.6.3.2, page 3-40, Lines 859 to 869 describes impacts to neighborhoods, demographics, and community resources focusing on elements of each of the build alternatives that could create a barrier to community facilities, impact emergency response, or isolate neighborhood residents from community facilities.

The Draft EIS, Section 3.23.1.2, page 3-194, Lines 4089 through 4102 describe the methodology used to assess cumulative impacts for the Build Alternatives. FTA determined the appropriate geographic bounds for the consideration of reasonably foreseeable and past actions for the purpose of assessing cumulative effects. As such, potential indirect and cumulative effects within this area were taken into consideration for its effect determinations. Further detail regarding project resiliency features related to flooding and climate change, will also be presented in the Final EIS.

The Final EIS will include an additional qualitative assessment regarding the impact of the project on greenhouse gasses. The Final EIS will describe impacts of the Preferred Alternative. A commitment to incorporate resiliency measures for foreseeable cumulative climate change impacts, in particular flooding, will be added, including elevation of structures above the 500-foot floodplain. The project is not expected to lead to a net increase in GHG emissions, so no mitigation measures of direct climate change impacts by the project are proposed.

### 5.2.5.24 Noise

**Summary of Comments:** 7 comments were received regarding potential noise impacts of the project. General noise concerns of all build alternatives included the following:

- Increased noise affecting the residents of Potomac Greens, both during construction and operation of the station;
- Request for more details regarding mitigation measures for noise both during construction and operation of the station;
- Recommendations for specific noise mitigation measures such as sound-absorbing walls or a landscaped berm;
- Consider the condition of surrounding buildings, structures, infrastructure and utilities, where appropriate; and whether any special protection is needed for historic properties;
- During construction, prepare contingency measures in the event established noise limits are exceeded and consider steps to avoid generating noise from cumulative operations that may exceed noise limits; and
- Mitigate existing noise impacts.

**Response:** The Draft EIS was prepared in accordance with FTA and WMATA's noise and vibration requirements. Noise mitigation measures are discussed in Section 3.12.4 of the Draft EIS. Further detail regarding these project potential noise mitigation measures will be developed and presented in the Final EIS and/or later design phases and provided to agencies and stakeholders, as appropriate and in accordance with FTA and WMATA's noise criteria. FTA's noise and vibration criteria take into consideration noise-sensitive receptors for potential noise impacts.

Construction activities will be conducted in accordance with the City of Alexandria Noise Control Code. To minimize construction related noise and address any potential exceedances of local ordinances, the project construction activities will consider using noise and vibration control measures, as stated in the Draft EIS. Specific measures could include use of alternative equipment to reduce noise and vibration, operating high noise and vibration sources as far away from sensitive receptors as possible, public notification programs to alert residents in advance of particularly disruptive activities, and complaint resolution procedures.

With regard to cumulative operations, the site experiences existing elevated ambient noise levels dominated by roadway and rail sources, aircraft take-offs and landings, freight train operations, Metrorail pass-bys, and vehicular traffic. These existing sources were included in the noise and vibration analysis. Given these elevated existing ambient noise levels, additional cumulative noise impacts are not expected.

### 5.2.5.25 NPS Land Impacts

**Summary of Comments:** 9 comments were received regarding NPS land impacts associated with the project, including the following issues and concerns:

- Station should not impact GWMP land or related scenic easements;
- Draft EIS should be amended to incorporate recent agreement between NPS and the City of Alexandria regarding land transfers associated with Build Alternative B; and
- Fixing up Daingerfield Island does not compensate for degradation of the GWMP; and
- The insignificant distance between the Alternative A versus Alternative B station locations in regards to the highest density development is not worth the impact to GWMP land.

**Response:** Any action taken by NPS in conjunction with this project must be consistent with the National Park Service Organic Act, which directs NPS to “conserve the scenery and the natural and historic objects and wild life therein” (16 U.S.C. 1). NPS and the City of Alexandria would need to agree on a package of mitigations that would ensure a net benefit to the George Washington Memorial Parkway under the project.

In addition, the project must comply with Section 106 of the National Historic Preservation Act, which requires federal agencies to consider the effects of their actions on historic properties, and with Section 4(f) of the U.S. Department of Transportation Act, which protects public parks and recreational lands, wildlife refuges, and historic sites. Review of the project under these acts is being conducted in parallel with the NEPA process, as described in Section 3.9, Section 3.10, Appendix D, and Appendix F of the Draft EIS.

The Draft EIS, Section 3.3, Land Acquisitions and Displacements, subsection 3.3.3.2, Build Alternatives, Property Impacts, discusses potential impacts to NPS property and interests in property, including the Greens Scenic Area easement, by the project alternatives and the requirements for approval by NPS and a land exchange process.

On May 20, 2015 the City of Alexandria City Council voted unanimously in selecting Build Alternative B as the locally preferred alternative. The City of Alexandria’s factors for the selection of the preferred alternative are detailed in the City’s *Staff Recommendation for the Preferred Alternative*, which is available on the City’s website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors including community impacts and benefits as well as impacts to NPS parkland in selecting the preferred alternative. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA’s decision and present its basis for the decision regarding the NEPA preferred alternative.

The Final EIS will provide additional details on proposed mitigation measures for impacts to the George Washington Memorial Parkway, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsible agencies. The Final EIS will be updated to incorporate details of the Net Benefit Agreement between the City of Alexandria and NPS. The Final EIS will also include information on the City’s selection of the preferred alternative.

FTA and NPS will separately review the Final EIS and, pending their review and acceptance, NPS will issue its Record of Decision for the EIS, after which FTA will issue its own Record of Decision.

### 5.2.5.26 Other

**Summary of Comments:** 8 comments were received with concerns that did not address substantive issues of the Draft EIS or that addressed various minor details in the document that did not fall within the broader topics of other comments. For example, the Arlington County Department of Community Planning, Housing and Development submitted corrections and suggestions for map and text information regarding existing/planned geographic features and planned infrastructure improvements within Arlington County.

**Response:** The Final EIS will incorporate these corrections and clarifications as appropriate.

### 5.2.5.27 Parking

**Summary of Comments:** 4 comments were received expressing concerns regarding parking in the station vicinity and surrounding neighborhoods.

- More explanation for how the City will control unauthorized parking in Potomac Greens near the station;
- Recommend creation of a residential parking district in Potomac Greens that is strictly enforced;
- Question why parking is not provided at the station for station passengers; and
- There should be some accommodations for drivers to safely drop off passengers without stopping in active traffic lanes.

**Response:** This station is envisioned as an urban Metrorail station, consistent with the City of Alexandria's adopted plans for Potomac Yard (described in the Draft EIS, Section 2.1, Local Planning Process), which include dense mixed-use, transit-oriented development in close proximity to the proposed station location. Urban stations are intended to be primarily accessed via foot, bicycle, and connecting transit services. Adjacent parking facilities would limit the ability to provide transit-oriented development in close proximity to the station and prioritize access by non-auto modes. In the Draft EIS, Section 3.2.3.2, Parking Facilities, states that the introduction and enforcement of parking restrictions, including time limits and residential parking, would largely avoid and minimize the potential impacts of Metrorail patrons attempting to park along public streets in adjoining neighborhoods. The Final EIS will address any additional traffic mitigation measures needed as required for the project. Future design phases for the project will develop more detailed plans for managing traffic along public streets in the vicinity of station entrances.

### 5.2.5.28 Pedestrian Access

**Summary of Comments:** 5 comments were received regarding pedestrian access to the proposed station. Comments related to all build alternatives addressed the following issues:

- Pedestrian accommodations, including sidewalks and crosswalks, within one-half mile of the station need to be in optimal condition and ADA compliant;
- Specific locations in the station vicinity identified where improvements to pedestrian crossings are needed;
- Separate pedestrian and bicycling facilities to avoid conflicts;
- Pedestrian tunnels instead of bridges would be preferable;
- Include a pedestrian/bicycle bridge to the Mount Vernon Trail and Daingerfield Island; and
- Lack of a Kiss & Ride facility at the station requires all users to walk, which may be difficult for some users.

**Response:** The Draft EIS, Section 2.4, Build Alternatives, notes that all station alternatives incorporate a pedestrian and bicycle bridge between the Potomac Yard and the Potomac Greens neighborhoods that will be open 24 hours a day. Pedestrian accommodations will be provided at each station entrance in accordance with Metro station access guidelines and design criteria. More detailed design of these facilities will be included in future project design phases after the conclusion of the NEPA review process. The City of Alexandria is responsible for planning pedestrian access between the station and surrounding origins/destinations. All comments received on the Draft EIS have been reviewed by the City of Alexandria.

All station facilities will be designed in accordance with the Americans with Disabilities Act guidelines. As you have noted, the station will not have an off-street Kiss & Ride facility, but accommodations will be developed during more detailed design phases for on-street pick-up and drop-off of station patrons in close proximity to the station similar to other urban stations.

### 5.2.5.29 Pollution Prevention

**Summary of Comments:** One comment noted that the Virginia Department of Environmental Quality (VDEQ) Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques and that the responsibilities for pollution prevention stem from the Governor's Executive Order Number Nineteen (2010).

**Response:** Further detail regarding these project elements will be developed and presented in the Final EIS and/or later design phases and provided to agencies and stakeholders, as appropriate.

### 5.2.5.30 Potomac Greens Neighborhood

**Summary of Comments:** 13 comments were received expressing various concerns regarding project impacts to the Potomac Greens neighborhood. Comments expressed concerns regarding impacts both during construction and due to ongoing Metrorail station operations.

- Vehicle drop-offs and pick-ups of passengers at the station and impacts of associated traffic on Potomac Greens;
- Parking along streets in Potomac Greens by non-residents;
- Construction noise and vibration;
- Construction vehicle traffic, including impacts to convenient neighborhood access by residents and pedestrian safety;
- Impacts to aesthetics due to the loss of vegetation and station lighting;
- Neighborhood safety and security due to the new pedestrian access point and increase in non-residents passing through Potomac Greens;
- Question regarding neighborhood covenants addressing the maintenance costs and funding of the pedestrian bridge to Potomac Yard; and
- Ideas suggested to address traffic and security concerns such as limiting use of the station pedestrian access from Potomac Greens to neighborhood residents only or moving the station pedestrian access from the east side of the Metrorail tracks further south closer to the Old Town Greens neighborhood.

**Response:** As noted in the comments, some of the additional vehicular trips generated by the station may use local neighborhood streets to access the station for passenger drop-offs and pick-ups. Although these additional trips are not expected to degrade overall roadway and intersection LOS, they may be noticeable on streets that currently have very low traffic volumes. The introduction and enforcement of parking restrictions, including time limits and residential permitting, would largely avoid and minimize the impacts of Metrorail patrons attempting to park along public streets in adjoining neighborhoods. Additional traffic calming measures may be considered during later project phases.

The Draft EIS, Section 3.24, Construction Impacts, describes potential impacts and identifies broad minimization and mitigation measures for impacts such as those stated in the comments. All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision. Project development during the design phase will further define efforts to minimize construction impacts and, for unavoidable impacts, will define methods to restore resources to their prior condition. During these later design phases, a Transportation Management Plan (TMP) will be developed. The TMP will address construction activities related to the project as well as permanent station operations and will be prepared in coordination with VDOT, the City of Alexandria, and other agencies as applicable.

Regarding security in the vicinity of the station, the Draft EIS, Section 3.21, Safety and Security, describes measures used at Metrorail stations to create a secure environment for patrons. WMATA's Metro Transit Police Department will perform law enforcement and public safety services at the station, and the City of Alexandria Police Department will perform these services in the station vicinity.

With regard to the cost to construct the pedestrian bridge to Potomac Yard and agreements regarding maintenance: Neither the cost to construct the individual pedestrian bridge nor the cost of maintenance of the bridge, as stand-alone charges, has been estimated. The City of Alexandria, as the project sponsor, is aware of the concern and has met with the homeowners association to discuss this matter further.

The Final EIS will also include a description of future public outreach, including how information will be disseminated to affected parties regarding project effects, and proposed mitigation measures for them.

#### 5.2.5.31 Public Involvement

**Summary of Comments:** 4 comments were received on topics related to public involvement in the NEPA process and during project construction.

- City selection of a preferred alternative should have been made after consideration of public comments;
- City has an obligation to completely address the questions and concerns raised by citizens at the public hearing;
- The Draft EIS should be amended to include the recent agreement between NPS and the City of Alexandria so citizens can provide reasonable comments on the alternatives included in the DEIS and on the agreement;
- Describe how future public involvement will be conducted, including communication on impacts such as noise and vibration and mitigation measures; and
- Consider establishing a public communication plan.

**Response:** The City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015, following the comment period on the Draft EIS. All comments received on the Draft EIS were reviewed by the City of Alexandria. The Final EIS will incorporate any new information affecting the project since the publication of the Draft EIS and will be released for public review. Any additional agreements made between the cooperating agencies will be included in the Final EIS and is required as part of the Record of Decision (ROD). Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

The Final EIS will include a description of future public outreach, including how information will be disseminated to affected parties regarding project effects, such as noise and vibration, and proposed mitigation measures for them. A public communication plan will be established, providing information on public meetings, email and telephone contacts, and other relevant information regarding project construction and design.

#### 5.2.5.32 Safety and Security

**Summary of Comments:** 4 comments were received expressing concern with safety and security in the Potomac Greens neighborhood as a result of the station and the proposed pedestrian access point from the northern end of the neighborhood.

- Station will bring non-residents into the neighborhood and increase crime; and
- Recommend that the pedestrian access to the station from the northern end of Potomac Greens Drive be relocated further south near the traffic circle to reduce vehicular traffic in the neighborhood or limiting access to the station from Potomac Greens for neighborhood residents only.

**Response:** The Draft EIS, Section 3.21, Safety and Security, describes measures used at Metrorail stations to create a secure environment for patrons. WMATA's Metro Transit Police Department will perform law enforcement and public safety services at the station, and the City of Alexandria Police Department will perform these services in the station vicinity. All comments received on the Draft EIS have been reviewed by the City of Alexandria.

The proposed station designs included in the Draft EIS, Section 2.3, Build Alternatives, locate the Potomac Greens pedestrian/bicycle bridge close to the station to facilitate the ability of Metrorail passengers to access the station via walking and bicycle.

### 5.2.5.33 Shopping Center

**Summary of Comments:** 5 comments were received regarding the existing Potomac Yard Shopping Center, including the movie theater, expressing the following concerns:

- Oppose displacement of the shopping center and movie theater for the project; and
- Financial impacts of the project do not account for the loss in the shopping center's tax resulting from its displacement.

**Response:** The Draft EIS, Section 3.4 Land Use and Zoning, states the impacts of the Build Alternatives on surrounding uses, including the shopping center. Neither Build Alternative A nor Build Alternative B would displace the existing shopping center or movie theater. Under Build Alternative B, the northern station entrance would touch down on a portion of the shopping center parking lot that, in the future, is planned for redevelopment and open space as part of a dense mixed-use development incorporating a Metrorail station entrance.

The Draft EIS, Section 2.1, Local Planning Process, summarizes City of Alexandria small area planning for North Potomac Yard, which includes the existing Potomac Yard Shopping Center. The City's adopted North Potomac Yard Small Area Plan envisions the replacement of the retail center with a high-density, transit-oriented neighborhood, including 7.525 million square feet of office, retail, residential, and hotel uses.

### 5.2.5.34 Station Design

**Summary of Comments:** Three comments on station design were received.

- EPA supports design measures such as pervious surfaces and other low-impact development Best Management Practices (BMPs);
- The EIS should be clear that the height of the Alternative B station would need to be reduced to the extent possible to meet zoning requirements and that minimization of the station's visual impact to the George Washington Memorial Parkway should be a key design goal; and
- More traditional designs like the original Metrorail above ground stations would better harmonize with the George Washington Memorial Parkway.

**Response:** The Draft EIS, Section 3.19, Sustainability, states that the station will be designed consistent with the local sustainability requirements. Station design features that comply with green building policies and objectives, such as LEED Silver Certification, would be developed during detailed design phases of the project. LID design features and other stormwater BMPs will also be considered and may include features such as grassed swales, bioretention cells/rain gardens, permeable pavement, infiltration trenches, sand and organic filters, inlet protection devices, and others to be defined during later design phases. Further details regarding BMPs to reduce project impacts will be provided in the Final EIS and/or in later design phases, as appropriate.

The Final EIS will incorporate architectural design refinements, currently ongoing, that will adjust the station height relative to grade level consistent with City of Alexandria zoning requirements. Other design measures to minimize visual impacts of the station are currently under development. Key architectural design refinements, such as modifications to the retaining wall, fill areas around the station, and resulting station height relative to grade level, will be included in the FEIS and its impact evaluations. Additional minor refinements proposed for mitigation of project impacts will be specified in the Record of Decision.

### 5.2.5.35 Station Necessity

**Summary of Comments:** 4 comments were received regarding the necessity of the project, affirming that the proposed Metrorail station project meets the stated need or questioning the need for a Metrorail station at Potomac Yard due to other existing transit and travel options in the vicinity.

**Response:** The Draft EIS, Section 1.3, describes the project's purpose and need, part of which is to provide a direct access point to the regional transit system within Potomac Yard.

### 5.2.5.36 Station Ridership

**Summary of Comments:** One comment indicated the station ridership forecast for Alternative B is shown as 11,300 on Line 209 of the Draft EIS and 13,200 on Line 4185 and noted that the difference between these numbers is greater than the difference in ridership between Alternative A and Alternative B.

**Response:** The Draft EIS, Section 3.2 Transportation (includes Line 209), reports 2040 forecast station ridership for the Build Alternatives with the base level of new development in Potomac Yard that would be allowed under the No Build Alternative. Section 3.23, Secondary and Cumulative Effects (includes Line 4185), reports 2040 forecast station ridership with the additional level of new development in Potomac Yard that would be allowed under adopted City plans and zoning if a station is located in the vicinity of the Build Alternative B location.

### 5.2.5.37 Support the Project (General)

14 comments were received expressing general support for the project without indicating a preference for a particular Build Alternative.

**Summary of Comments:** Comments expressed support for the project, some simply stating support, others also providing a rationale for their support, and others stating support but expressing concern regarding a particular aspect of the project. Issues addressed in the comments included the following:

- Supporting the project without stating a specific reason;
- Supporting the project and the associated planned development in Potomac Yard without stating specific reasons;
- Infill Metrorail stations support the region by combining development with access to Metrorail, thereby fighting rising housing prices, sprawl, long commutes, and pollution;
- The rail service and infrastructure and their associated noise impacts are already there, and the parks and wetlands are already impacted by their urban surroundings, so it makes sense to add a station;
- Potomac Yard property is underutilized and the station will support its development;
- Station will help the area economically;
- Support the project but have concerns about financing or traffic; and
- Support the project but would like a location that better serves Arlington.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria. The preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS.

### 5.2.5.38 Support No Build Alternative / Oppose Project

**Summary of Comments:** 13 comments were submitted expressing support for the No Build Alternative or in opposition to the Project. The following rationale was given:

- Impacts on traffic, affordability, and the environment are too great;
- The area can be well served by Metroway without the station and its associated impacts;
- Fix the existing Metrorail system first;
- The project primarily benefits property developers rather than residents;
- Project will have a cost overrun at least as large as the 30-40 percent overrun of the NoMa (New York Avenue) Metrorail station construction, also constructed as an infill station;
- GWMP should not be encroached upon or visually impacted;
- No new Metrorail station is justified which adds ridership to an overcapacity system unless the vast majority of net new riders are in the counterflow direction;
- More economical ways to improve access to existing Metrorail stations than construction of new station;
- Opposed to building a Metrorail station on parkland;
- Consider instead using the money for City of Alexandria schools;
- Station will delay existing Metrorail commuters;
- Station primarily benefits new development rather than Metrorail passengers;
- Project relies on undesirable funding mechanisms such as special tax districts and increases City debt; and
- Construction vehicle routes would adversely impact Potomac Greens and surrounding neighborhoods.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

### 5.2.5.39 Taxes

19 comments were received regarding taxes.

#### *Potomac Yard Special Tax District*

**Summary of Comments:** Most of the comments expressed opposition to the Potomac Yard Special Tax District:

- It is unfair that the Potomac Yard residents would be the only ones paying for the project;
- Special tax district should be applied equally to other neighborhoods such as Potomac Greens or not at all;
- Some of the residences in the special tax district are closer to Braddock Road Metro; and
- Potomac Yard residents deserve more consultation by the City on the project if they are going to pay more.

**Response:** The Draft EIS, Chapter 5, discusses project costs and funding. The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS were reviewed by the City of Alexandria. The Final EIS will be updated to reflect any changes regarding the financing for the project.

### **General Opposition to New Taxes**

**Summary of Comments:** Other comments expressed general opposition to new taxes:

- Opposition to using special tax districts in general; and
- City taxpayers should not pay to move station from agreed upon site in 1970s.

**Response:** The Draft EIS, Chapter 5, discusses project costs and funding. The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria. The Final EIS will be updated to reflect any changes regarding the financing for the project.

#### **5.2.5.40 Vehicle Traffic**

20 comments were submitted regarding vehicular traffic related to the proposed new station.

#### **Overall Project Traffic Impacts**

**Summary of Comments:** The following concerns regarded overall traffic impacts from the station:

- Vehicle drop-offs and pick-ups of passengers at the station and impacts of associated traffic on adjacent residential neighborhoods, especially Potomac Greens; and
- Lack of Kiss & Ride facility to handle drop-offs and pick-ups.

**Response:** The Draft EIS, Section 3.2.3, discusses the potential impacts of a new Metrorail station at Potomac Yard on area traffic conditions. The station is projected to generate low levels of vehicular trips similar to other urban stations; however, these additional trips resulting from the project Build Alternatives would have no effect on overall intersection Level of Service (LOS) in the study area compared to the No Build condition. Near the Potomac Greens neighborhood, the analysis included the Portner/Potomac Greens Drive and Slaters Lane intersection (the ingress/egress intersection to Potomac Greens). AM peak hour LOS is projected to be LOS A for the No Build and Build conditions in both 2016 and 2040. PM peak hour LOS is projected to be LOS A for both the No Build and Build conditions 2016 and LOS B for both the No Build and Build conditions in 2040.

As noted in the comments, some of these additional vehicular trips may use local neighborhood streets to access the station for passenger drop-offs and pick-ups. Although these additional trips are not expected to degrade overall roadway and intersection LOS, they may be noticeable on streets that currently have very low traffic volumes. The introduction and enforcement of parking restrictions, including time limits and residential permitting, would largely avoid and minimize the impacts of Metrorail patrons attempting to park along public streets in adjoining neighborhoods. The City of Alexandria is responsible for planning traffic improvements and pedestrian accommodations at specific locations in the neighborhoods surrounding the proposed station location. All comments received on the Draft EIS have been reviewed by the City of Alexandria. Additional traffic calming measures may be considered during later project phases.

#### **Traffic Impacts to East Glebe Road**

**Summary of Comments:** Additional comments were concerned with traffic impacts at the intersection of East Glebe Road and U.S. Route 1:

- Impact of additional traffic volume generated by the station on the eastbound approach of the intersection resulting in a downgrade in the level of service compared to the No Build condition;
- Concerns regarding pedestrian safety, safe access to cars parked on street, and ability to access residential driveways on street;
- Request for traffic calming or other mitigation measures along East Glebe Road; and
- Concern regarding additional traffic generated by Oakville Triangle redevelopment.

**Response:** Regarding vehicle traffic along East Glebe Road, as discussed in Section 3.2.3 of the Draft EIS, a new Metrorail station at Potomac Yard would not have an adverse effect on overall traffic conditions in the study area, as defined by a decrease in overall intersection Level of Service (LOS). However, as referenced in the comments, the eastbound approach of the East Glebe Road and U.S. Route 1 intersection would be expected to have a decrease in its LOS as a result of the project, although the overall intersection LOS would not change. The City of Alexandria is responsible for planning traffic improvements and pedestrian accommodations at specific locations in the neighborhoods surrounding the proposed station location. All comments received on the Draft EIS have been reviewed by the City of Alexandria. As part of its ongoing citywide traffic management and pedestrian programs, the City of Alexandria will monitor conditions along streets in the station vicinity during later project design phases and after the project opening. Through these periodic reviews, the City will determine if measures, such as traffic calming, are needed to address any issues associated with vehicular trips to the station.

The Draft EIS, Section 3.2.3.2, notes that the introduction and enforcement of parking restrictions, including time limits and residential permitting, would largely avoid and minimize the impacts of Metrorail patrons attempting to park along public streets in adjoining neighborhoods.

### *Comments on the Traffic Analysis*

**Summary of Comments:** Additional comments questioned the Draft EIS traffic analysis and estimated impact of the project:

- Most vehicles use Route 1 to commute to the District of Columbia, Pentagon City, or Crystal City, so the Potomac Yard Metrorail station would not serve them;
- Traffic analysis is inadequate because it does not fully consider the impacts of the development generated by the station, which is treated as a secondary and cumulative impact, and states the overall impact is beneficial;
- New residents and businesses in Potomac Yard will generate traffic backups whether or not there is a new Metrorail station;
- Citing national report that transportation demand has stabilized after a century of growth, and questioning whether Metrorail station would remove any more cars off the road.

**Response:** The Draft EIS, Section 2.5.3.3, describes the increased share of transit and other non-auto trips as a result of the project build alternatives, and Section 3.2.3.2 describes the effect of the project build alternatives traffic conditions. Section 3.2.1.2, Traffic Conditions, describes the methodology for assessing traffic conditions and potential effects of the project. The affected environment for traffic is described in detail in the Transportation Technical Memorandum (Appendix 4 Volume II of the Draft EIS). Direct traffic impacts of the project are described in Section 3.1 of the Draft EIS. Indirect and cumulative impacts are described in Section 3.23. As discussed in Section 3.2.3 of the Draft EIS, a new Metrorail station at Potomac Yard would not have an adverse effect on overall traffic conditions in the study area.

#### **5.2.5.41 Vibration**

**Summary of Comments:** Two comments were received regarding vibration effects. The U.S. EPA requested:

- Development of a vibration monitoring and mitigation plan that is shared with the public;
- Consideration of the condition of surrounding buildings, structures, infrastructure, utilities, and special consideration for historic buildings;
- Preparation of contingency measures if vibration limits are exceeded and steps to avoid generating cumulative effects that may exceed limits; and
- Further opportunities for public review if major changes in vibration data arise during final design or during vibration monitoring.

A comment by residents of Potomac Greens requested:

- Explanation of increased vibration affecting the current residents of Potomac Greens and how it will be mitigated during both construction and operation.

**Response:** The Draft EIS was prepared in accordance with FTA and WMATA's noise and vibration requirements. FTA's vibration criteria take into consideration sensitive receptors for potential impacts. Vibration mitigation measures are discussed in Section 3.12.4 of the Draft EIS. Section 3.24.4 describes mitigation of potential vibration impacts due to construction activities. During construction, the project will implement vibration control measures as discussed in Section 3.24.4.1 of the Draft EIS. No pile driving is anticipated, which will help minimize any vibration impacts from construction.

To minimize construction-related vibration and address any potential exceedances of local ordinances, the project construction activities will consider using vibration control measures, as stated in the Draft EIS. Specific measures could include use of alternative equipment to reduce vibration, operating high vibration sources as far away from sensitive receptors as possible, vibration monitoring during construction, public notification programs to alert residents in advance of particularly disruptive activities, and complaint resolution procedures.

All mitigation measures for the Preferred Alternative will be specified in the Final EIS. At this stage of project design, further details regarding the levels, duration, and frequency of construction-related vibration are not available. Further details of the mitigation measures will be developed during the final design phase of the project, as appropriate, when the details of the project components and the construction scenarios are finalized.

The Final EIS will include a description of future public outreach, including how information will be disseminated to affected parties regarding project effects, such as noise and vibration, and proposed mitigation measures for them. A public communication plan will be established, providing information on public meetings, email and telephone contacts, and other relevant information regarding project construction and design. Further detail regarding these project elements will be developed and presented in the Final EIS and/or later design phases and provided to agencies and stakeholders, as appropriate.

With regard to cumulative operations, the site experiences existing ambient vibration from freight train operations, Metrorail pass-bys, and vehicular traffic. These existing sources were included in the vibration analysis.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. No permanent vibration impacts are anticipated from ongoing operation of the station under Build Alternative B.

#### 5.2.5.42 Water Quality

**Summary of Comments:** Five comments on water quality were received, including the following:

- Stormwater management treatment features in upland areas (not in Waters of the US) should be incorporated into the design of the alternatives;
- The EIS should include an analysis of how the alternatives will potentially affect water quality;
- The Virginia Department of Health-Office of Drinking Water (VDHO-ODW) has concluded that there are no apparent impacts to public drinking water sources from the proposed project, however potential impacts to public water distribution systems or sanitary sewage systems must be verified by the local utility;
- The Virginia Department of Environmental Quality's Northern Regional Office (VDEQ-NRO) stated that the project may affect streams or wetlands and that a Virginia Water Protection Permit may be required. VDEQ-NRO also recommends that the project avoid surface water impacts, minimize unavoidable

impacts, consult with the U.S. Army Corps of Engineers on the issue, and noted that all authorizations relative to water quality impacts from point sources will need to be obtained; and

- The VDEQ-NRO also provided contact information for Virginia Water Protection Permits, specified that the Marine Resources Commission coordinates water resources application for the Subaqueous Land Encroachment Permits, provided contact information for the U.S. Army Corps of Engineers, and specified the federal and state laws that affect water resources permitting.

**Response:** Section 3.13 of the Draft EIS assessed the project's impacts to water quality. The analysis indicates that although additional impervious surface and runoff would result from Build Alternatives, the project would adhere to water quality performance management criteria set by the City of Alexandria in accordance with Sec. 13-109 § (5) of the City Zoning Ordinance, which control the rate and water quality of stormwater runoff. These existing stormwater criteria and management plans and practices in the City of Alexandria would minimize potential impacts from increases in impervious surface. No water quality impacts for the Build Alternatives in comparison to the No Build Alternative are anticipated.

Stormwater management treatment features will not be placed in WOUS to the extent feasible and will be in accordance with the U.S. Army Corps of Engineers and NPS requirements during the respective permitting processes.

Existing hydrology in the study area has been modified over the years by various transportation improvements that have occurred since the early twentieth century, including construction of the Potomac Yard rail yard and the George Washington Memorial Parkway and later alterations to the railroad tracks for the current alignments of the CSXT line and the Metrorail Blue/Yellow Line. The current hydrology will be restored in accordance with the U.S. Army Corps of Engineers and NPS requirements during the respective permitting processes.

Further detail regarding the stormwater management treatment features will be developed and presented in the Final EIS and/or later design phases and provided to agencies and stakeholders, as appropriate. The Final EIS will include any additional impacts and analyses on water quality if applicable. The Final EIS will also include any additional information related to wetlands, water quality, and permitting based on the reviews of the project conducted by VDHO-ODW and VDEQ-NRO.

#### 5.2.5.43 Wetlands / Waters of the U.S.

**Summary of Comments:** 13 comments were received regarding wetlands and other water resources, including the following recommendations and concerns:

- Careful consideration of mitigation efforts to minimize the permanent and temporary impacts to wetlands;
- Improving the quality of restored wetlands by removing invasive species;
- Maintaining buffers around aquatic habitats;
- Using Best Management Practices (BMPs) to minimize water quality impacts to aquatic resources;
- EIS document should address how the project's alternatives conform to the Chesapeake Bay Executive Order 13508;
- Noting that the project must comply with Section 404 of the Clean Water Act;
- Clarifying the distinction between wetlands regulated by the U.S. Army Corps of Engineers and those by the National Park Service;
- Clarifying the distinction between Waters of the United States and wetlands;
- Providing more detail regarding the tidal/non-tidal characteristics of the wetland;
- Providing more details regarding the function and values of the wetlands;
- Providing more details regarding monitoring and adaptive management plans;
- Addressing connection to any larger wetland complex in the area; and
- The Draft EIS does not discuss mitigation of existing contamination during restoration of affected wetlands.

**Response:** The Draft EIS, Section 3.14, Waters of the United States (Wetlands), describes potential impacts and identifies minimization and mitigation measures. All mitigation measures for the Preferred Alternative will be specified in the Record of Decision. Further details of the mitigation measures, including Best Management Practices (BMPs), will be developed in accordance with NPS and USACE during the final design phase of the project when details of the project components and the construction scenarios are finalized.

The Draft EIS, Section 3.19, Sustainability, states that the Build Alternatives will be designed consistent with the local sustainability requirements. Station design features that comply with green building policies and objectives, such as LEED Silver Certification, would be developed during detailed design phases of the project. With regard to water retention, the project will incorporate Low Impact Development (LID) design features and other stormwater BMPs that may include grassed swales, bioretention cells/rain gardens, permeable pavement, infiltration trenches, sand and organic filters, inlet protection devices, and others to be defined during later design phases.

The *Water Resources Technical Memorandum* in Volume II of the Draft EIS provides additional information on the tidally-influenced or non-tidal characteristics of the Waters of the United States within the study area. Additionally, impacts to wetlands will be analyzed in the Statement of Findings as required by NPS in accordance with the Director's Order 77-1, and will be included in the Final EIS. Further definition of wetlands will be conducted as needed during the permitting process in coordination with USACE, NPS, and state agencies.

The Draft EIS, Section 3.14, describes the difference between National Park Service wetlands and U.S. Army Corps of Engineers wetlands and defines Waters of the U.S. The *Water Resources Technical Memorandum* in Volume II of the Draft EIS provides additional information. These descriptions will be reviewed and clarified as needed in the Final EIS.

With regard to buffer areas, the Final EIS will include any additional impacts and analyses on Resource Protection Areas if applicable.

NPS may also approve the use of regulated wetlands and floodplains on NPS land in accordance with Director's Orders 77-1 and 77-2, which establish the policies, requirements, and standards through which the NPS will meet its responsibilities to protect and preserve wetlands and floodplains. A Wetland and Floodplain Statement of Findings is currently being prepared by NPS in accordance with the Director's Orders, which will include measures to mitigate impacts to wetlands and floodplains. The Statement of Findings will be published with the Final EIS, and all mitigation measures for the Preferred Alternative will be specified in the Record of Decision. Further details of the mitigation measures will be developed in accordance with NPS and USACE during the final design phase of the project when details of the project components and the construction scenarios are finalized.

With regard to the Chesapeake Bay EO 13508, the order states, "to ensure that federal actions to protect and restore the Chesapeake Bay are closely coordinated with actions by state and local agencies in the watershed and that the resources, authorities, and expertise of federal, state, and local agencies are used as efficiently as possible for the benefit of the Chesapeake Bay's water quality and ecosystem and habitat health and viability".

FTA submitted a Federal Consistency Determination to the Virginia Department of Environmental Quality (VDEQ) Coastal Zone Management Program (CZMP) in December 2012 and submitted the Draft EIS to VDEQ in March 2015. VDEQ provided comments on the Federal Consistency Determination in January 2013 and for the Draft EIS in April 2015. The Federal Consistency Determination commits the project to a variety of actions related to consistency with Virginia's CZMP. The City of Alexandria will be responsible for implementing these commitments, which will include the issuance of a permit under Sections 401 and 404 of the Clean Water Act. The Final EIS will discuss these commitments and potential impacts associated with their implementation.

The Draft EIS, Section 3.20, Hazardous and Contaminated Materials, and Section 3.24, Construction Impacts, subsection on Hazardous and Contaminated Materials (pages 3-226 and 3-227), discuss contamination on the site of the former rail yard (including the area within the Greens Scenic Area easement where the wetlands are located), potential effects of the Build Alternatives, and measures to avoid, minimize and mitigate adverse effects during project construction.

#### 5.2.5.44 WMATA

**Summary of Comments:** Two comments regarding impacts to WMATA's Metrorail System were received:

- The Metrorail System has already exceeded its design capacity and that the additional ridership from a new station cannot be accommodated unless the new riders are travelling in the reverse commute direction; and
- Concern about the impact of a new station stop on the travel time for Metrorail riders that are not traveling to or from Potomac Yard, including concern that these riders were not consulted about the project.

**Response:** Metro's Momentum strategic plan lays out recommendations to address Metrorail passenger crowding and other issues through the year 2025.

WMATA and the City of Alexandria provided outreach beyond the Potomac Yard neighborhood, which is documented in Chapter 4 of the Draft EIS. Section 3.2.3.2 of the Draft EIS discusses impacts to Metrorail operations as a result of the Potomac Yard Metrorail Station. Adding a Potomac Yard Metrorail Station would result in approximately one additional minute in run time between National Airport and Braddock Road Metrorail stations. In the off-peak, one additional train in service is required to accommodate the increased cycle time needed on the Yellow Line from Huntington to Fort Totten. These impacts will result in minimal changes for existing Metrorail riders.

### 5.3 Outline of Detailed Comments and Responses

For the detailed comments and responses in Section 5.5, the following outline lists the page numbers where specific topics and alternatives are discussed.

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## 5.4 Index of Responses

**Table 5-2** provides an index of the Section 5.5 detailed comments and responses by commenter and topic. Many individual comments are divided into excerpts by sub-topic. The comment excerpt ID can be used to look up specific comments and responses.

**Table 5-2: Index of Responses by Commenter and Topic**

Last Name	First Name	Organization	Alternative Referenced	Topic	Comment Excerpt ID	Comment #
Adams	David	Individual	Build Alternative B	Support Build Alternative B	1-2-23-8-110, 1	110
Adams	Michelle	Individual	Build Alternative B	Support Build Alternative B	1-2-23-8-113, 1	113
Adams	Michelle	Individual	General Comment	Potomac Greens Neighborhood	1-2-28-8-113, 1	113
Aiken	Benjamin	Individual	Build Alternative B	Support Build Alternative B or B-CSX Design Option	1-2-24-2-67, 1	67
Aiken	Benjamin	Individual	B-CSX Design Option	Support B-CSX Design Option	1-3-24-2-67, 1	67
Allen	Emily	Individual	General Comment	Land Use	1-5-20-2-28, 1	28
Allen	Emily	Individual	General Comment	Vehicle Traffic	1-5-7-2-28, 1	28
Anderson	Mark	Individual	B-CSX Design Option	Support B-CSX Design Option	1-3-24-1-80, 1	80
Anderson	Mark	Individual	General Comment	Demographics	1-2-54-1-80, 1	80
Anderson	Mark	Individual	General Comment	Metroway and Other Bus Service	1-2-31-1-80, 1	80
Anderson	Mark	Individual	General Comment	Station Necessity	1-5-14-1-80, 1	80
Anderson	Mark	Individual	General Comment	Vehicle Traffic	1-5-18-1-80, 1	80
Anonymous		Individual	Build Alternative A	Noise	1-1-4-7-143, 1	143
Anonymous		Individual	Build Alternative A	Vibration	1-1-4-7-143, 1	143
Anonymous		Individual	Build Alternative A	Support Build Alternative A	1-1-22-8-97, 1	97
Anonymous		Individual	Build Alternative B	Bicycle Access	1-2-19-7-145, 1	145
Anonymous		Individual	Build Alternative A	Construction Impact	1-2-29-8-129, 1	129
Anonymous		Individual	Build Alternative B	Construction Impact	1-2-29-8-129, 1	129
Anonymous		Individual	Build Alternative B	Construction Impact	1-2-29-7-144, 1	144
Anonymous		Individual	Build Alternative B	Noise	1-2-4-7-143, 1	143
Anonymous		Individual	Build Alternative B	Support Build Alternative A or Build Alternative B	1-2-22-8-97, 1	97
Anonymous		Individual	Build Alternative B	Support Build Alternative B	1-2-23-7-141, 1	141
Anonymous		Individual	Build Alternative B	Support Build Alternative B	1-2-23-7-143, 1	143
Anonymous		Individual	Build Alternative B	Support Build Alternative B	1-2-23-7-144, 1	144
Anonymous		Individual	Build Alternative B	Support Build Alternative B	1-2-23-7-145, 1	145
Anonymous		Individual	Build Alternative B	Support Build Alternative B	1-2-23-8-100, 1	100

Last Name	First Name	Organization	Alternative Referenced	Topic	Comment Excerpt ID	Comment #
Anonymous		Individual	Build Alternative B	Support Build Alternative B	1-2-23-8-114, 1	114
Anonymous		Individual	Build Alternative B	Support Build Alternative B	1-2-23-8-133, 1	133
Anonymous		Individual	B-CSX Design Option	Support B-CSX Design Option	1-3-24-8-108, 1	108
Anonymous		Individual	B-CSX Design Option	Support B-CSX Design Option	1-3-24-8-129, 1	129
Anonymous		Individual	Build Alternative D	Financial Resources	1-4-22-8-97, 1	97
Anonymous		Individual	Build Alternative D	Support Build Alternative D	1-4-25-8-108, 1	108
Anonymous		Individual	General Comment	Community Facilities	1-5-57-8-124, 1	124
Anonymous		Individual	General Comment	Construction Impact	1-5-29-8-124, 1	124
Anonymous		Individual	General Comment	Land Use	1-5-20-7-146, 1	146
Anonymous		Individual	General Comment	Metroway and Other Bus Service	1-2-31-8-114, 1	114
Anonymous		Individual	General Comment	Public Involvement	1-5-17-8-118, 1	118
Anonymous		Individual	General Comment	Support General	1-5-26-8-127, 1	127
Anonymous		Individual	General Comment	Support No Build	1-5-30-7-146, 1	146
Anonymous		Individual	General Comment	Vehicle Traffic	1-5-7-8-127, 1	127
Anonymous		Individual	General Comment	Wetlands / Waters of the U.S.	1-5-13-7-148, 1	148
Attilis	Al	Individual	Build Alternative A	Support Build Alternative A	1-1-22-8-135, 1	135
Attilis	Al	Individual	Build Alternative B	Safety and Security	1-2-5-8-135, 1	135
Baird	Alli	Virginia Department of Conservation and Recreation	General Comment	Natural Resources	4-5-49-2-60, 1	60
Bartos	Scott	Individual	B-CSX Design Option	Support B-CSX Design Option	1-3-24-2-49, 1	49
Bergin	Patrick and Jocilyn	Individual	General Comment	Vehicle Traffic	1-5-7-2-178, 1	178
Bickmore	Paul	Individual	Build Alternative B	Support Build Alternative B	1-2-23-2-40, 1	40
Biff	Betsy	Individual	General Comment	Bicycle Access	1-5-19-2-139, 1	139
Bramwell	Adam	Individual	General Comment	Taxes	1-5-21-1-239, 1	239
Burke	Andrea	Virginia Department of Historic Resources	General Comment	Cultural Resources	4-5-12-2-156, 1	156
Burstein	Daniel	Virginia Department of Environmental Quality (DEQ), Northern Virginia Office	General Comment	Air Pollution	4-5-45-2-208, 1	208
Burstein	Daniel	Virginia Department of Environmental Quality (DEQ),	General Comment	Contaminated Materials	4-5-46-2-208, 1	208

Last Name	First Name	Organization	Alternative Referenced	Topic	Comment Excerpt ID	Comment #
		Northern Virginia Office				
Burstein	Daniel	Virginia Department of Environmental Quality (DEQ), Northern Virginia Office	General Comment	Flooding and Stormwater Management	4-5-34-2-208, 1	208
Caldwell	Craig	Amtrak	General Comment	Amtrak, VRE and CSX Impacts	3-5-50-2-10, 1	10
Cannady	Katy	Individual	Build Alternative A	Financial Resources	1-1-9-1-246, 1	246
Cannady	Katy	Individual	Build Alternative B	Financial Resources	1-1-9-1-246, 1	246
Cannady	Katy	Individual	Build Alternative A	Shopping Center	1-1-36-1-246, 1	246
Cannady	Katy	Individual	Build Alternative A	Support Build Alternative A	1-1-22-1-81, 1	81
Cannady	Katy	Individual	Build Alternative A	Support Build Alternative A	4-1-22-1-246, 2	246
Cannady	Katy	Individual	Build Alternative B	Financial Resources	1-2-9-1-81, 1	81
Cannady	Katy	Individual	Build Alternative B	Cultural Resources	1-2-12-1-81, 1	81
Cannady	Katy	Individual	General Comment	Metroway and Other Bus Service	1-5-31-1-81, 1	81
Cannady	Katy	Individual	General Comment	Support No Build Alternative	4-5-30-1-246, 1	246
Carol	Ann	Individual	Build Alternative B	Support Build Alternative B	1-2-23-2-70, 1	70
Cavanaugh	Dave	Individual	Build Alternative B	GW Parkway Environmental Mitigation	1-2-11-1-85, 1	85
Cavanaugh	Dave	Individual	General Comment	NEPA Process and Methodology	1-5-33-2-61, 1	61
Cavanaugh	Dave	Individual	General Comment	NEPA Process and Methodology	1-5-33-2-62, 1	62
Cavanaugh	Dave	Individual	General Comment	NPS Land Impacts	1-5-15-1-85, 1	85
Cavanaugh	Dave	Individual	General Comment	Public Involvement	1-5-17-1-85, 1	85
Cavanaugh	Dave	Individual	General Comment	Public Involvement	1-5-17-2-61, 1	61
Cavanaugh	Dave	Individual	General Comment	Public Involvement	1-5-17-2-62, 1	62
Cavanaugh	Dave	Individual	General Comment	Support General	1-5-26-2-61, 1	61
Christopher	Jeremiah	Individual	Build Alternative B	Support Build Alternative B	1-2-23-2-46, 1	46
Clarke	Walter	Alexandria Chamber of Commerce	Build Alternative B	Support Build Alternative B	6-2-23-1-89, 1	89
Clarke	Walter	Alexandria Chamber of Commerce	General Comment	Financial Resources	6-5-9-1-89, 1	89
Coad	Susan	Individual	General Comment	Financial Resources	1-5-9-8-104, 1	104
Coad	Susan	Individual	General Comment	Other	1-5-27-1-91, 1	91
Coad	Susan	Individual	General Comment	Other	1-5-27-8-104, 1	104

Last Name	First Name	Organization	Alternative Referenced	Topic	Comment Excerpt ID	Comment #
Coad	Susan	Individual	General Comment	Support General	1-5-26-1-91, 1	91
Coe	Steve	Virginia Department of Environmental Quality (DEQ)	General Comment	Contaminated Materials	4-5-46-2-207, 1	207
Cohen	Jeff	Individual	General Comment	Bicycle Access	1-5-19-2-50, 1	50
Colbert	Tonya	Individual	General Comment	Support General	4-5-26-1-235, 1	235
Colbert	Tonya	Individual	General Comment	Taxes	1-5-21-1-235, 1	235
Cole	Randy	Individual	General Comment	Bicycle Access	1-5-19-2-140, 1	140
Cook	John C.	Virginia Railway Express (VRE)	General Comment	Amtrak, VRE, and CSX Impacts	4-5-2-2-153, 1	153
Cook	John C.	Virginia Railway Express (VRE)	General Comment	Construction Impact	4-5-29-2-153, 1	153
Creasy	Troy	CSXT	B-CSX Design Option	Amtrak, VRE and CSX Impacts	5-3-2-2-167, 1	167
Curley	Timothy E	Individual	General Comment	Support General	1-5-26-2-18, 1	18
Cusack	Austin	Individual	General Comment	Support General	4-5-26-1-233, 1	233
Cusack	Austin	Individual	General Comment	Taxes	1-5-21-1-233, 1	233
Custis	Aimee	Coalition for Smarter Growth	Build Alternative B	Support Build Alternative B	6-2-23-1-76, 1	76
Custis	Aimee	Coalition for Smarter Growth	Build Alternative B	Wetlands / Waters of the U.S.	6-2-13-1-76, 1	76
Dixon	David	Mount Vernon Group of the Sierra Club	Build Alternative B	Support Build Alternative B	4-2-23-6-247, 1	247
Drudi	Dino	Individual	Build Alternative B	Metroway and Other Bus Service	1-2-31-1-245, 1	245
Drudi	Dino	Individual	B-CSX Design Option	Support B-CSX Design Option	1-3-24-1-245, 1	245
Drudi	Dino	Individual	B-CSX Design Option	Support B-CSX Design Option	1-3-24-7-151, 1	151
Drudi	Dino	Individual	Build Alternative D	Pedestrian Access	1-4-0-7-151, 1	151
Drudi	Dino	Individual	General Comment	Blue and Yellow Line	1-5-8-7-151, 1	151
Drudi	Dino	Individual	General Comment	Financial Resources	1-5-9-1-75, 1	75
Drudi	Dino	Individual	General Comment	Metroway and Other Bus Service	1-5-31-1-75, 1	75
Drudi	Dino	Individual	General Comment	Pedestrian Access	1-5-0-7-151, 1	151
Drudi	Dino	Individual	General Comment	Station Design	1-5-65-7-151, 1	151
Drudi	Dino	Individual	General Comment	Support No Build Alternative	1-5-30-1-245, 1	245
Drudi	Dino	Individual	General Comment	Support No Build Alternative	1-5-30-1-75, 1	75
Drudi	Dino	Individual	General Comment	Support No Build Alternative	1-5-30-7-151, 1	151
Drudi	Dino	Individual	General Comment	WMATA	1-5-18-7-151, 1	151
Dunn	David	Individual	Build Alternative B	Bicycle Access	1-2-19-2-176, 1	176

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Dunn	David	Individual	Build Alternative B	Construction Impact	1-2-29-2-160, 1	160
Dunn	David	Individual	Build Alternative B	Pedestrian Access	1-2-0-2-160, 1	160
Dunn	David	Individual	Build Alternative B	Pedestrian Access	1-2-0-2-176, 1	176
Dunn	David	Individual	Build Alternative B	Support Build Alternative B	1-2-23-2-160, 1	160
Dunn	David	Individual	B-CSX Design Option	Support B-CSX Design Option	1-3-24-2-160, 1	160
Dunn	David	Individual	General Comment	GW Parkway Aesthetics	1-5-10-1-87, 1	
Dunn	David	Individual	General Comment	Metroway and Other Bus Service	1-5-31-1-87, 1	87
Dunn	David	Individual	General Comment	Noise	1-2-4-2-160, 1	160
Dunn	David	Individual	General Comment	Potomac Greens Neighborhood	1-5-28-1-87, 1	87
Dunn	David	Individual	General Comment	Support No Build Alternative	1-5-30-1-87, 1	87
Dunn	David	Individual	General Comment	Vehicle Traffic	1-5-7-1-87, 1	87
Durbin	Patrick	Individual	Build Alternative B	Support Build Alternative B	1-2-23-2-57, 1	57
Durham	Jim	Alexandria Bicycle and Pedestrian Advisory Committee (BPAC)	General Comment	Bicycle Access	6-5-19-2-155, 1	155
Eisele	Scott	Individual	Build Alternative A	Support Build Alternative A	1-1-22-1-92, 1	92
Eisele	Scott	Individual	Build Alternative B	Support Build Alternative A or Build Alternative B	1-2-22-1-92, 1	92
Eisele	Brook & Scott	Individual	General Comment	Support General	1-5-26-2-71, 1	71
Eisele	Scott	Individual	General Comment	Vehicle Traffic	1-5-7-1-92, 1	92
Eisele	Brook & Scott	Individual	General Comment	Vehicle Traffic	1-5-7-2-71, 1	71
Eisenmann	Carol	Individual	General Comment	Financial Resources	1-5-9-2-20, 1	20
Eisenmann	Carol	Individual	General Comment	Land Use	1-5-20-2-20, 1	20
Eisenmann	Carol	Individual	General Comment	Metroway and Other Bus Services	1-5-31-2-20, 1	20
Eisenmann	Carol	Individual	General Comment	Other	1-5-27-2-20, 1	20
Eisenmann	Carol	Individual	General Comment	Support No Build Alternative	1-5-30-2-20, 1	20
Eisenmann	Carol	Individual	General Comment	Wetlands / Waters of the U.S.	1-5-13-2-20, 1	20
Estricko	Anthony	Individual	General Comment	Taxes	1-5-21-1-242, 1	242
Evans	Greg	Virginia Department of Forestry	B-CSX Design Option	Support B-CSX Design Option	4-3-24-2-210, 1	210
Evans	Greg	Virginia Department of Forestry	General Comment	Natural Resources	4-5-48-2-210, 1	210

Last Name	First Name	Organization	Alternative Referenced	Topic	Comment Excerpt ID	Comment #
Fennell	Tim and Anne-Marie	Individual	General Comment	Construction Impact	1-5-29-2-159, 1	159
Fennell	Tim and Anne-Marie	Individual	General Comment	Safety and Security	1-5-5-2-159, 1	159
Fennell	Tim and Anne-Marie	Individual	General Comment	Noise	1-5-4-2-159, 1	159
Fennell	Tim and Anne-Marie	Individual	General Comment	Parking	1-5-39-2-159, 1	159
Fennell	Tim and Anne-Marie	Individual	General Comment	Potomac Greens Neighborhood	1-5-28-2-159, 1	159
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Rudnick	Barbara	EPA	General Comment	NEPA Process and Methodology	3-5-33-2-161, 53	161
Rudnick	Barbara	EPA	General Comment	Noise	3-5-4-2-161, 5	161
Rudnick	Barbara	EPA	General Comment	Noise	3-5-4-2-161, 7	161
Rudnick	Barbara	EPA	General Comment	Public Involvement	3-5-17-2-161, 44	161
Rudnick	Barbara	EPA	General Comment	Public Involvement	3-5-17-2-161, 9	161
Rudnick	Barbara	EPA	General Comment	Station Design	3-5-65-2-161, 35	161

Last Name	First Name	Organization	Alternative Referenced	Topic	Comment Excerpt ID	Comment #
Rudnick	Barbara	EPA	General Comment	Vibration	3-5-37-2-161, 2	161
Rudnick	Barbara	EPA	General Comment	Vibration	3-5-37-2-161, 6	161
Rudnick	Barbara	EPA	General Comment	Vibration	3-5-37-2-161, 8	161
Rudnick	Barbara	EPA	General Comment	Vibration	3-5-17-2-161, 33	161
Rudnick	Barbara	EPA	General Comment	Water Quality	3-5-47-2-161, 14	161
Rudnick	Barbara	EPA	General Comment	Water Quality	3-5-47-2-161, 18	161
Rudnick	Barbara	EPA	General Comment	Water Quality	3-5-47-2-161, 50	161
Rudnick	Barbara	EPA	General Comment	Wetlands / Waters of the U.S.	3-5-60-2-161, 11	161
Rudnick	Barbara	EPA	General Comment	Wetlands / Waters of the U.S.	3-5-60-2-161, 16	161
Rudnick	Barbara	EPA	General Comment	Wetlands / Waters of the U.S.	3-5-60-2-161, 3	161
Rudnick	Barbara	EPA	General Comment	Wetlands / Waters of the U.S.	3-5-60-2-161, 4	161
Rudnick	Barbara	EPA	General Comment	Wetlands / Waters of the U.S.	3-5-60-2-161, 51	161
Rudnick	Barbara	EPA	General Comment	Wetlands / Waters of the U.S.	3-5-60-2-161, 52	161
Rudnick	Barbara	EPA	General Comment	Wetlands / Waters of the U.S.	3-5-13-2-161, 10	161
Rudnick	Barbara	EPA	General Comment	Wetlands / Waters of the U.S.	3-5-13-2-161, 12	161
Rudnick	Barbara	EPA	General Comment	Wetlands / Waters of the U.S.	3-5-13-2-161, 13	161
Rudnick	Barbara	EPA	General Comment	Wetlands / Waters of the U.S.	3-5-13-2-161, 15	161
Rudnick	Barbara	EPA	General Comment	Wetlands / Waters of the U.S.	3-5-13-2-161, 17	161
Rudnick	Barbara	EPA	General Comment	Wetlands / Waters of the U.S.	3-5-13-2-161, 19	161
Rudnick	Barbara	EPA	General Comment	Wetlands / Waters of the U.S.	3-5-13-2-161, 20	161
Rudnick	Barbara	EPA	General Comment	Wetlands / Waters of the U.S.	3-5-13-2-161, 46	161
Ruhr	Roberta	Virginia Department of Conservation and Recreation, Division of Natural Heritage (OCR)	General Comment	Natural Resources	4-5-48-2-209, 1	209
Ruhr	Roberta	Virginia Department of Conservation and Recreation, Division of Natural Heritage (OCR)	General Comment	Other	4-5-27-2-209, 1	209
Rust	Mary	Individual	Build Alternative B	Support Build Alternative B	1-2-23-2-34, 1	34
Sampson	Richard	Individual	Build Alternative A	Support Build Alternative A	1-1-22-7-150, 1	150
Samuels	Harry	Virginia Department of	General Comment	Other	4-5-27-2-211, 1	

Last Name	First Name	Organization	Alternative Referenced	Topic	Comment Excerpt ID	Comment #
		Health, Office of Drinking Water				
Samuels	Harry	Virginia Department of Health, Office of Drinking Water	General Comment	Water Quality	4-5-47-2-211, 1	211
Schrader	John	Individual	Build Alternative A	Potomac Greens Neighborhood	1-1-28-1-90, 1	90
Schrader	John	Individual	Build Alternative B	Construction Impact	1-2-29-1-90, 1	90
Schrader	John	Individual	Build Alternative B	Potomac Greens Neighborhood	1-2-28-1-90, 1	90
Schrader	John	Individual	Build Alternative B	Support Build Alternative B	1-2-23-1-90, 1	90
Schrader	John	Individual	Build Alternative B	Vehicle Traffic	1-2-7-1-90, 1	90
Schrader	John	Individual	Build Alternative D	Potomac Greens Neighborhood	1-4-28-1-90, 1	90
Schrader	John	Individual	General Comment	NEPA Process and Methodology	1-1-33-1-90, 1	90
Schrader	John	Individual	General Comment	Station Necessity	1-5-14-1-90, 1	90
Sekulow	Arianna	Individual	Build Alternative B	Construction Impact	1-2-29-1-88, 1	88
Sekulow	Arianna	Individual	Build Alternative B	Safety and Security	1-2-5-1-88, 1	88
Sekulow	Arianna	Individual	Build Alternative B	Financial Resources	1-2-9-1-88, 1	88
Sekulow	Arianna	Individual	Build Alternative B	Potomac Greens Neighborhood	1-2-28-1-88, 1	88
Sekulow	Arianna	Individual	General Comment	Support No Build Alternative	1-5-30-1-88, 1	88
Silversmith	Jol A.	Individual	General Comment	Blue and Yellow Line	1-5-8-2-26, 1	26
Silversmith	Jol A.	Individual	General Comment	Construction Impact	1-5-29-2-26, 1	26
Staley II / Herlin	Terrance / Ann	Individual	Build Alternative A	Vibration	1-1-37-2-66, 1	66
Staley II / Herlin	Terrance / Ann	Individual	Build Alternative B	Support Build Alternative B or B-CSX Design Option	1-2-24-2-66, 1	66
Staley II / Herlin	Terrance / Ann	Individual	B-CSX Design Option	Support B-CSX Design Option	1-3-24-2-66, 1	66
Staley II / Herlin	Terrance / Ann	Individual	General Comment	GW Parkway Aesthetics	1-5-10-2-64, 1	64
Staley II / Herlin	Terrance / Ann	Individual	General Comment	Potomac Greens Neighborhood	1-5-28-2-65, 1	65
Staley II / Herlin	Terrance / Ann	Individual	General Comment	Vehicle Traffic	1-5-7-2-65, 1	65
Sullivan	Jack	Individual	Build Alternative A	Financial Resources	4-1-9-1-243, 1	243
Sullivan	Jack	Individual	Build Alternative B	Financial Resources	4-1-9-1-243, 1	243
Sullivan	Jack	Individual	Build Alternative A	Support Build Alternative A	4-1-22-1-243, 1	243
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	B-CSX Design Option	Amtrak, VRE and CSX Impacts	4-3-50-2-189, 1	189
Sullivan	Bettina	Virginia Department of Environmental	B-CSX Design Option	Amtrak, VRE and CSX Impacts	4-3-50-2-189, 2	189

Last Name	First Name	Organization	Alternative Referenced	Topic	Comment Excerpt ID	Comment #
		Quality (DEQ				
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	Build Alternative D	Amtrak, VRE, and CSX Impacts	4-4-50-2-189, 1	189
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Air Pollution	4-5-45-2-183, 1	183
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Air Pollution	4-5-45-2-194, 1	194
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Amtrak, VRE and CSX Impacts	4-5-2-2-189, 1	189
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Amtrak, VRE and CSX Impacts	4-5-2-2-189, 2	189
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Amtrak, VRE and CSX Impacts	4-5-50-2-190, 1	190
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Construction Impact	4-5-29-2-191, 1	191
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Construction Impacts	4-5-29-2-190, 1	190
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Contaminated Materials	4-5-46-2-184, 1	184
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Contaminated Materials	4-5-46-2-195, 1	195
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Financial Resources	4-5-9-1-189, 1	189
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Flooding and Stormwater Management	4-5-34-2-182, 1	182
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Flooding and Stormwater Management	4-5-34-2-193, 1	193
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Cultural Resources	4-5-12-2-180, 1	180
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Cultural Resources	4-5-12-2-192, 1	192

Last Name	First Name	Organization	Alternative Referenced	Topic	Comment Excerpt ID	Comment #
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Metroway and Other Bus Service	4-5-31-2-189, 1	189
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Natural Resources	4-5-48-2-199, 1	199
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Natural Resources	4-5-48-2-200, 1	200
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Natural Resources	4-5-48-2-166, 1	166
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Natural Resources	4-5-48-2-186, 1	186
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Natural Resources	4-5-48-2-196, 1	196
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Natural Resources	4-5-48-2-197, 1	197
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Natural Resources	4-5-48-2-202, 1	202
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Natural Resources	4-5-49-2-187, 1	187
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Pollution Prevention	4-5-53-2-201, 1	201
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Station Necessity	4-5-14-2-189, 1	189
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Water Quality	4-5-47-2-188, 1	188
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Water Quality	4-5-47-2-196, 1	196
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Wetlands / Waters of the U.S.	4-5-13-2-185, 1	185
Sullivan	Bettina	Virginia Department of Environmental Quality (DEQ)	General Comment	Wetlands / Waters of the U.S.	4-5-13-2-196, 1	196
Summe	Jack	Individual	Build Alternative A	City Parks Impacts	1-1-28-1-73, 1	73

Last Name	First Name	Organization	Alternative Referenced	Topic	Comment Excerpt ID	Comment #
Summe	Jack	Individual	Build Alternative A	Land Use	1-1-20-1-73, 1	73
Summe	Jack	Individual	Build Alternative A	Potomac Greens Neighborhood	1-1-28-1-73, 1	73
Summe	Jack	Individual	Build Alternative B	Safety and Security	1-2-5-1-73, 1	73
Summe	Jack	Individual	Build Alternative B	Support Build Alternative B	1-2-23-1-73, 1	73
Summe	Jack	Individual	General Comment	Potomac Greens Neighborhood	1-5-28-8-126, 1	126
Summe	Jack	Individual	General Comment	Vehicle Traffic	1-5-7-8-126, 1	126
Sylla	Ben	Individual	Build Alternative B	Support Build Alternative B	1-2-23-8-99, 1	99
Tennant	Denise L.	City of Alexandria Beautification Committee	Build Alternative B	City Park Impacts	2-2-66-5-137, 1	137
Tennant	Denise L.	City of Alexandria Beautification Committee	Build Alternative B	Construction Impact	2-2-29-5-137, 1	137
Tennant	Denise L.	City of Alexandria Beautification Committee	Build Alternative B	Flooding and Stormwater Management	2-2-34-5-137, 1	137
Tennant	Denise L.	City of Alexandria Beautification Committee	Build Alternative B	Support Build Alternative B	2-2-23-5-137, 2	137
Tennant	Denise L.	City of Alexandria Beautification Committee	Build Alternative B	Wetlands / Waters of the U.S.	2-2-13-5-137, 1	137
Tennant	Denise L.	City of Alexandria Beautification Committee	General Comment	Wetlands / Waters of the U.S.	2-5-13-5-137, 1	137
Teslik	Steven	Individual	Build Alternative B	Financial Resources	1-2-9-1-83, 1	83
Teslik	Steven	Individual	Build Alternative B	Wetlands / Waters of the U.S.	1-2-13-1-83, 1	83
Teslik	Steven	Individual	B-CSX Design Option	Wetlands / Waters of the U.S.	1-3-13-1-83, 1	83
Teslik	Steven	Individual	General Comment	Financial Resources	1-5-9-1-83, 1	83
Teslik	Steven	Individual	General Comment	Other	1-5-15-1-83, 1	83
Teslik	Steven	Individual	General Comment	Shopping Center	1-5-36-1-83, 1	83
Teslik	Steven	Individual	General Comment	Vehicle Traffic	1-5-7-1-83, 1	83
Todd	Brad	Individual	Build Alternative A	Support Build Alternative A	1-1-22-2-69, 1	69
Van Fleet	Van	Old Town Civic Association	General Comment	Construction Impact	4-5-29-6-244, 1	244
Van Fleet	Van	Individual	General Comment	Construction Impact	1-5-29-2-72, 1	72
Van Fleet	Van	Old Town Civic Association	General Comment	Financial Resources	4-5-9-6-244, 1	244
Van Fleet	Van	Individual	General Comment	GW Parkway Aesthetics	1-5-10-2-72, 1	72

Last Name	First Name	Organization	Alternative Referenced	Topic	Comment Excerpt ID	Comment #
Van Fleet	Van	Individual	General Comment	Metroway and Other Bus Service	1-5-31-2-72, 1	72
Van Fleet	Van	Individual	General Comment	Pedestrian Access	1-5-0-2-72, 1	72
Van Fleet	Van	Individual	General Comment	Support No Build Alternative	1-5-30-2-72, 1	72
Van Fleet	Van	Old Town Civic Association	General Comment	Taxes	4-5-21-6-244, 1	244
Van Fleet	Van	Individual	General Comment	Taxes	1-5-21-2-72, 1	72
Van Fleet	Van	Individual	General Comment	Vehicle Traffic	1-5-7-2-72, 1	72
Van Tassel	Mark	Individual	Build Alternative B	Support Build Alternative B	1-2-23-2-39, 1	39
Vignes	Leon	Arlington County Department of Community Planning, Housing and Development Planning Division	Build Alternative D	Other	2-4-27-2-138, 1	138
Vignes	Leon	Arlington County Department of Community Planning, Housing and Development Planning Division	General Comment	Other	2-5-27-2-138, 1	138
Voorhees	Catherine	Individual	Build Alternative A	Support Build Alternative A	1-1-22-2-173, 1	173
Voorhees	Catherine	Individual	General Comment	Construction Impact	1-5-29-2-173, 1	173
Voorhees	Catherine	Individual	General Comment	NPS Land Impacts	1-5-15-2-173, 1	173
Webber	Richard	Individual	Build Alternative B	Support Build Alternative B	1-2-23-5-31, 1	31
Welch	Harriet A.	Individual	General Comment	Comment not Pertaining to Project	1-5-38-2-19, 1	19
Whitaker	Norman	Virginia Department of Transportation - Northern Virginia District	General Comment	Construction Impact	4-5-29-2-213, 1	213
Whitfield	Robert	Fairfax County Taxpayers Alliance	General Comment	Financial Resources	6-5-9-1-79, 1	79
Williams Pugh	Molly	Individual	Build Alternative B	Support Build Alternative B	1-2-23-2-172, 1	172
Woodmaska	John	Individual	General Comment	GW Parkway Aesthetics	1-5-10-2-14, 1	14
Woodmaska	John	Individual	General Comment	Land Use	1-5-20-2-14, 1	14
Woodmaska	John	Individual	General Comment	Support No Build Alternative	1-5-30-2-14, 1	14
Woodmaska	John	Individual	General Comment	Wetlands / Waters of the U.S.	1-5-13-2-14, 1	14
Yuskavage	Timothy	Individual	Build Alternative B	Bicycle Access	1-2-19-2-15, 1	15
Yuskavage	Timothy	Individual	Build Alternative B	Potomac Greens Neighborhood	1-2-28-2-15, 1	15

Last Name	First Name	Organization	Alternative Referenced	Topic	Comment Excerpt ID	Comment #
Yuskavage	Timothy	Individual	Build Alternative B	Support Build Alternative B	1-2-23-2-15, 1	15
Yuskavage	Timothy	Individual	B-CSX Design Option	Financial Resources	1-3-9-2-15, 1	15
Yuskavage	Timothy	Individual	Build Alternative D	Financial Resources	1-4-9-2-15, 1	15
Yuskavage	Tim	Individual	General Comment	Bicycle Access	1-5-19-2-171, 1	171
Yuskavage	Timothy	Individual	General Comment	Metroway and Other Bus Services	1-4-31-2-15, 1	15
Zshu	Cindy	Individual	General Comment	Taxes	1-5-21-1-241, 1	241

## 5.5 Comments and Responses

As described above in Sections 5.3 and 5.4, all comments received are reported in this section by master topic and sub-topic. Lengthy comments that addressed multiple topics are broken up by master topic/sub-topic; as a result, a single comment may be referenced in multiple subsections. The only parts of the comments that are excluded from this section are information not relevant to the project and Draft EIS, such as salutations and the commenter's name and other personal information. The complete comments are included in **Appendix F**.

### 5.5.1 Build Alternative A

#### 5.5.1.1 City Parks Impacts

**(1-1-28-1-73, 1):** Alternative A, on the other hand, has several detractors. Because of its more southern location, it provides less readily available access to the commercial areas in Potomac Yard. In my view, it would also have a significant negative impact on the members of community, Potomac Greens.

It would take away a quaint and lovely park that is used continuously by family and others for an open green space for children and pets to play.

**Response:** For the preferred alternative the Final EIS will describe proposed mitigation measures for impacts to City parklands. (2-2-66, 1)

#### 5.5.1.2 Construction Impacts

**(1-2-29-1-86, 1):** Will a construction be a problem? I'm an architect, I've managed construction, yes, it'll be a problem for a while, but after that, their homes will be much more valuable if Alternative A is built.

**(1-2-29-8-129, 1):** As a homeowner who lives on Potomac Greens Drive in the Potomac Greens community, the only metro alternative that I support is B-CSX due to the serious and undesired negative impacts of Alternative A and B on my neighborhood and the value of my home. Most notably I oppose A because it will be in my front yard - literally, and I oppose A and B because of the construction traffic on my street.

**Response:** The Draft EIS, Section 3.24, Construction Impacts, describes potential impacts and identifies broad minimization and mitigation measures for impacts such as those stated in the comments. All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision. At this stage of project design, further details regarding the levels, duration, and frequency of construction-related noise, vibration, and fugitive dusts are not available. Project development during the design phase will further define efforts to minimize construction impacts and, for unavoidable impacts, will define methods to restore resources to their prior condition.

The City of Alexandria on May 20, 2015 adopted Build Alternative B with Construction Access Option 2 (no access from the GWMP roadway) as the preferred alternative for the project, which will be carried forward in the Final EIS.

Regarding construction traffic on other roadways, further details of the mitigation measures will be developed during the final design phase of the project when details of the project components and the construction scenarios are finalized and a Transportation Management Plan (TMP) will be developed. The TMP will address construction activities related to the project as well as permanent station operations and will be prepared in coordination with VDOT, the City of Alexandria, and other agencies as applicable.

(1-2-29, 1)

### 5.5.1.3 Financial Resources

**(1-1-9-1-86, 1):** I really think that Alternative A should be pursued[...]

However, I think that the no-build alternative is a very important choice, and I think that if the folks who were part of the tax district to help pay for the station don't want to be part of paying for it, if the folks who will be living next to it don't want the benefit from living next to it, then maybe we should just not build it.

**(4-1-9-1-243, 1):** In that capacity, I have sat through no fewer than three briefings of the same charts that you see in the staff report. My concern is that they lack the clear figures on how the station -- how much the station will cost the City's taxpayers and the assumptions that are the basis for this staff cost benefit analysis. Assuming, as I do, that the choice is between A and B, my preference is for A, not just because of the reduced impact to the Parkway but because of the savings and others will speak to that. [...]

**Response:** Regarding the differences in estimated capital costs among the alternatives, the Draft EIS, Section 5.1.1, Capital Cost Estimate, provides preliminary cost estimates for the Build Alternatives. Refined cost estimates will be developed as the project advances into the implementation phase. The Draft EIS, Section 5.1.2, Capital Funding Sources, lists multiple funding sources for all build alternatives in addition to net new tax revenues, as well as other sources for Build Alternative B in addition to developer contributions. The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors in addition to cost in selecting the preferred alternative. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

(1-1-9, 1)

**(1-1-9-1-246, 1):** Now, we have Option A which is no more than three blocks south of Option B. The estimated price difference between the two stations is 209 million for A and 268 million for B. Even if that were the entire cost differential, Option B costs several million more dollars for each block of separation.

But those are not the only different costs. Debt service for Option B is 13.9 million annually. Debt service for Option A is 8.8 million annually. We have somehow persuaded the National Park Service to give us an easement over federal parkland degrading an important scenic route between Washington and Mount Vernon to create the tract alignment for Option B. We will, however, have to compensate the Park Service with about 12 million in projects the Park Service would like. Option A does not degrade the Parkway and does not have any of that cost.

...We are told that the build out of the shopping center will bring all the revenue needed to pay for our wealthy infrastructure debt. I think that is unlikely but even if it were true, the debt is the debt of our city and the debt of all its taxpayers. Owing such a big debt will limit our ability to borrow for other things that will become necessary, another public school, another fire station, maybe even some more parkland.

...And by the way, I know because she told me so one day in the work room. Vola Lawson (ph) hated tax increment financing. She told me that in 1997 with such vehemence that I have always remembered it. As we know -- -- Vola was as good as it gets as budget.

**Response:** Regarding differences in estimated capital costs among the alternatives: The Draft EIS, Section 5.1.1, Capital Cost Estimate, provides preliminary cost estimates for the Build Alternatives. The costs of mitigation, including wetlands replacement and soil mitigation, are included in the cost estimates. Refined cost estimates will be developed as the project advances into the implementation phase.

The Draft EIS, Section 5.1.2, Capital Funding Sources, lists multiple funding sources for all build alternatives in addition to net new tax revenues as well as other sources for Build Alternative B in addition to developer contributions. The potential funding sources do not include tax increment financing. The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors in addition to cost in selecting the preferred alternative. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

(1-1-9, 2)

#### 5.5.1.4 GW Parkway Aesthetics

**(1-1-10-8-136, 1):** Option B is clearly visible from the Parkway, and it will largely extinguish the special entrance, especially with the 500 ft. long and very high bridge from the Yard to the metro stop that runs practically parallel to the Parkway. The Park Service has entered into an agreement under significant political pressure, and while fixing up Dangerfield Island is laudable, it is not part of the purpose of the George Washington Memorial Highway, and this in no way compensates for the degradation of the parkway that will transpire. Furthermore, the notion that option A is as visible and obtrusive to the parkway is absurd[...]

On a more general note, the studies did not incorporate any value for the loss of scenic vistas[...]

Finally, the more expensive, station will create a wholesale destruction of the view shed of the George Washington Memorial Parkway. The required longer bridge has minimum height requirements that (with its location and length) will make it a significant intrusion on scenic vistas from the George Washington Memorial Parkway.

**Response:** Regarding Build Alternative B's visual impacts to the GWMP compared to those of Build Alternative A, the Draft EIS Section 3.8 Visual Resources evaluates the impacts from six GWMP viewsheds as well as from the continuous GWMP corridor in the study area. The narrative and the visual quality ratings list different impacts for Build Alternative A (Section 3.8.3.2) and Build Alternative B (Section 3.8.3.3) at several of the GWMP viewsheds.

See Section 5.5.2.7 GW Parkway Aesthetics for responses to comments on Build Alternative B.

(1-1-10, 2)

### 5.5.1.5 Land Use

**(1-1-20-1-73, 1):** Alternative A, on the other hand, has several detractors. Because of its more southern location, it provides less readily available access to the commercial areas in Potomac Yard. In my view, it would also have a significant negative impact on the members of community, Potomac Greens.

It would take away a quaint and lovely park that is used continuously by family and others for an open green space for children and pets to play.

**Response:** Regarding the proximity of Build Alternative A to commercial areas of Potomac Yard and its impacts to the Potomac Greens community: The City of Alexandria adopted Build Alternative B as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors, including proximity to the North Potomac Yard commercial area, in selecting the preferred alternative. The Final EIS will specify mitigation measures for impacts to neighborhoods and parklands by Build Alternative B. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-1-20, 1)

### 5.5.1.6 Noise

**(1-1-4-8-98, 1):** However, I think recommendations and concerns voiced by residents of Potomac Greens, as they understand that space best and have made thoughtful suggestions, such as a noise wall, and better located pedestrian walkway.

**(1-1-4-7-143, 1):** Alternative A would impact quality of life for PG residents with noise/vibration and mammoth structure.

**Response:** Regarding potential noise effects by Build Alternative A: The City of Alexandria adopted Build Alternative B as the preferred alternative for the project on May 20, 2015. The Draft EIS, Section 3.12, Noise & Vibration discusses potential noise impacts of Build Alternative B, including proposed mitigation measures. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-5-4, 1)

### 5.5.1.7 Planning and Zoning Consistency

**(1-1-55-1-86, 1):** If there are short-term zoning issues, frankly, those are issues of the City's creation long since the Alternative A location was identified. So I would hope that the Potomac Greens folks would look past the next couple of years and hope that after that time we have a station there that will meet everybody's needs.

**Response:** With regard to planning and zoning consistency of Build Alternative A, the Draft EIS, Section 3.4 Land Use and Zoning, subsection 3.4.3.9 states that Build Alternative A would be inconsistent with the approved zoning for CDD #19. This zoning was adopted based on the City's most recent small area plan for the area, the North Potomac Yard Small Area Plan. (1-1-55, 1)

### 5.5.1.8 Potomac Greens Neighborhood

**(1-1-28-1-73, 1):** Alternative A, on the other hand, has several detractors. Because of its more southern location, it provides less readily available access to the commercial areas in Potomac Yard. In my view, it would also have a significant negative impact on the members of community, Potomac Greens.

It would take away a quaint and lovely park that is used continuously by family and others for an open green space for children and pets to play. [...]

**(1-2-28-1-90, 1):** Today, I can look out my kitchen window and see trees and parks and even some close neighbors across the way in the new developments. Alternative A means instead of sipping my morning coffee and looking out my window on an attractive vista, I will see thousands of my closest friends; conversely, they can see me, not something either of us want. [...]

**Response:** Regarding impacts to the Potomac Greens neighborhood and City parks by Build Alternative A: The City of Alexandria adopted Build Alternative B as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors, including impacts to neighborhoods, in selecting the preferred alternative. The Final EIS will describe impacts of the preferred alternative to neighborhoods in its vicinity, including the Potomac Greens neighborhood, and will specify mitigation measures. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-1-28, 1)

### 5.5.1.9 Shopping Center

**(1-1-36-2-12, 1):** Building along pre-existing track will save the taxpayers and WMATA a lot of money [...] The money saved from building on pre-existing tracks can be kept in a dedicated weekend shuttle between the Potomac Yard Metro stop and Potomac Yard. This option would also preserve the movie theater, a much-beloved local amenity.

**Response:** The Draft EIS, Section 3.4 Land Use and Zoning, states the impacts of the Build Alternatives on surrounding uses, including the shopping center. Neither Build Alternative A nor Build Alternative B would displace the existing shopping center or movie theater. Under Build Alternative B, the northern station entrance would touch down on a portion of the shopping center parking lot that, in the future, is planned for redevelopment and open space as part of a dense mixed-use development incorporating a Metrorail station entrance.

The Draft EIS, Section 2.1, Local Planning Process, summarizes City of Alexandria small area planning for North Potomac Yard, which includes the existing Potomac Yard Shopping Center. The City's adopted North Potomac Yard Small Area Plan envisions the replacement of the retail center with a high-density, transit-oriented neighborhood, including 7.525 million square feet of office, retail, residential, and hotel uses. (1-1-36, 1)

### 5.5.1.10 Support Build Alternative A

**(1-1-22-2-12, 1):** Building along pre-existing track will save the taxpayers and WMATA a lot of money. Bike/pedestrian trails from Potomac Green and Potomac Yards, in addition to a dedicated weekend shuttle going between the Metro and Potomac Yards, should solve all connectivity issues.

**(1-1-22-2-69, 1):** I strongly urge WMATA and the City of Alexandria to adopt Alternative A for the Potomac Yards station.

This option provides the most economic benefit to the city of Alexandria. The area along Slaters Lane, Potomac Greens, and Powhatan is strong and growing and a metro station that is walkable from this area - in addition to be walkable for residents of Potomac Yards - is clearly the smartest choice.

Just 20 years ago, the Slaters Lane corridor was home to a few struggling warehouse businesses and Potomac Greens was barely a glimmer in a developer's eye. Today, it's a revitalized section of town with great potential for further growth. Siting the metro between that area and Potomac Yards (Alternative A) makes the most sense for Alexandria taxpayers as a whole.

If the station is sited at one of the northern locations instead of Alternative A, much of the benefit will go to Arlington businesses and taxpayers - and it will be betting too strongly on infill development that could be many years away. The city of Alexandria has nearly 150,000 people and we only have 4 metro stations located inside the city, with two of those four (Eisenhower and Van Dorn) barely useful, being located just yards away from our border, hard up against a highway, and inaccessible from much foot traffic. That kind of location causes taxpayers to incur all of the cost of mass transit with only partial benefit. Given the difficult economic justification of transit in the first place, that kind of inefficiency is intolerable from a budgetary perspective. As a result, we should not make the same mistake with this new station.

Alternatives B, B-CSX, and D would all site the new station hard up against a highway (the GW Parkway) and near the border of a neighboring jurisdiction. They'd offer walking access (from a practical perspective) from only one direction. We should not waste this asset in that manner.

I realize that a few property owning residents in Potomac Greens oppose the "A" site at this time. However, those property owners bought into the neighborhood with a full understanding that a metro station was in the future plans - the signs were up from the very beginning and they were located at the proposed "A" alternative. Anyone who invested in Potomac Greens with that knowledge should not now be complaining about the potential of noise and light pollution from the same train station that was built into the assumptions for this neighborhood from the start. In fact, others of us invested in the neighborhood precisely BECAUSE we expected a walkable metro station to come one day.

If the city and WMATA does not choose Alternative A, my preference is for you to choose no station at all. The "B" and "D" options are bad deals for Alexandria's growth potential and remove the possibility of a wiser future decision that could locate a station within walking distance of the Route 1/Slaters Avenue intersection that is at the heart of this part of town.

**(1-1-22-1-81, 1):** For all intents and purposes, the only real options are A, B, and no-build [...]

But if the city feels it must have a Metro, A costs much less, and it's only, at most, three blocks away from B. And every one of those blocks is going to cost us a few million dollars. Is that really worth it?

**(1-2-22-1-86, 1):** I really think that Alternative A should be pursued. The problems with Alternative A are the result, frankly, of ill-advised history of planning decisions made by the City over the last 30 years. The Alternative A site was identified in the 1970s as the expected site for the station between Braddock Road and the airport. The buyers in Potomac Greens certainly, has been noted before, should've been fully aware that this was coming.

**(1-1-22-8-135, 1):** I support alternative A. Most practical, supported by large concentration of housing and less of an impact on Parkway. Most importantly it costs less, which translates to less taxes. Option A has been on the table 20+ years and has been studied long enough to show that it is supportable.

**(1-1-22-7-150, 1):** I support the A Alternative. Investment must be included for the continued improvement of the CCPY Transitway with higher frequency, single priority/pre-emption, and ultimately conversion to streetcar operation.

**(1-1-22-2-173, 1):** Alternative A is the best solution. During the thirty years that we have lived here, no access off the GWMP has been granted and for good reason.

**(4-1-22-1-243, 1):** Assuming, as I do, that the choice is between A and B, my preference is for A, not just because of the reduced impact to the Parkway but because of the savings and others will speak to that.

**(4-1-22-1-246, 2):** Now, we have Option A which is no more than three blocks south of Option B. The estimated price difference between the two stations is 209 million for A an 268 million for B. Even if that were the entire cost differential, Option B costs several million more dollars for each block of separation.

But those are not the only different costs. Debt service for Option B is 13.9 million annually. Debt service for Option A is 8.8 million annually. We have somehow persuaded the National Park Service to give us an easement over federal parkland degrading an important scenic route between Washington and Mount Vernon to create the tract

alignment for Option B. We will, however, have to compensate the Park Service with about 12 million in projects the Park Service would like. Option A does not degrade the Parkway and does not have any of that cost [...].

If we must have a Metro, let's have A. Better yet, let's have no build. We have a very fine BRT which Arlington will connect to now that it's given up on street cars. It's a very fine modern state-of-the-art what the future lies in BRT because it's so much less expensive and it can be built so much more quickly and for much less investment.

**(1-1-22-2-52, 1):** I would vote very strongly for Alternative A because there seems to be the least amount of present and future impact to the conservation area on the north side of the project.

**(1-5-22-2-59, 1):** The Potomac Yards Metro station should still be constructed, soon, where it was agreed to be sited in the 1970's Metro Plan [...] Build the station where it was planned in the 1970's, as soon as possible.

**(1-5-22-2-173, 1):** Second, Alternative A is the best solution. During the thirty years that we have lived here, no access off the GWMP has been granted and for good reason. While I understand that the City of Alexandria wants to develop the most that they can, I do not believe that the peace and tranquility of the GWMP experience should be denigrated so that the City of Alexandria can develop more. There is a very good reason for the GWMP land holdings as it provides visitors to Mount Vernon a journey that is close to what it was when George Washington road the farms. As soon as one chink is found in the GWMP scenic easement, it will be gone. Please protect the GWMP National Park for our children.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria. The City considered a range of factors in its selection, including those resource areas and factors listed in the comments received as well as all other resources and factors evaluated in the Draft EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-1-22, 1).

**(1-1-22-1-92, 1):** I think either the A or the B alternatives are great. My only objection to the D alternative is the cost, but I am definitely pro-build. I think there are benefits to property value.

**(1-1-22-8-98, 1):** I strongly support alternative A or B and strongly oppose a no-build option.

**(1-1-22-8-97, 1):** I support location/option A because of the southern access and lowest cost and lowest impact to existing infrastructure. Option B would be acceptable in my opinion as well.

Option B-CSX would cause too much disruption and should be eliminated.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria. The City considered a range of factors in its selection, including those resource areas and factors listed in the comments received as well as all other resources and factors evaluated in the Draft EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-1-22, 2)

### 5.5.1.11 Vibration

**(1-1-37-2-66, 1):** A primary concern for us is that our residence is shown as one of the residences that would be impacted by vibrations in build Alternative A. This is concerning to us because of its potential impact on our quality of life, the value of our residence, and our ability to sell the residence in the future. While it is anticipated that the vibrations would affect only a few homes, our homes are a significant financial and emotional investment for us.

Should Build Alternative A be chosen, we would strongly urge that mitigations be performed to eliminate the vibration impacts. We understand that one option might be to move the crossover north of the station, as the crossover is a primary source of the vibrations.

**(1-1-4-7-143, 1):** Alternative A would impact quality of life for PG residents with noise/vibration and mammoth structure.

**Response:** Regarding the potential vibration effects of Build Alternative A: The City of Alexandria adopted Build Alternative B as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. As evaluated in the Draft EIS, Section 3.12, Noise & Vibration, Build Alternative B would have no permanent vibration impacts.

The Draft EIS, Section 3.24.4 describes mitigation of potential vibration impacts due to construction activities. During construction, the project will implement vibration control measures as discussed in Section 3.24.4.1 of the Draft EIS. All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision. Further details of the mitigation measures will be developed during the final design phase of the project when the details of the project components and the construction scenarios are finalized. (1-1-37, 1)

## 5.5.2 Build Alternative B

### 5.5.2.1 Bicycle Access

**(1-2-19-1-77, 1):** First, remove the Potomac Greens drop-off point and covered walkway from the plan. Replace it with a planned pedestrian and bicycle bridge located at the traffic circle that sits on the boundary between Potomac Greens neighborhood and the Old Town Greens neighborhood. This would facilitate pedestrian and bicycle access to the Metrorail station while removing any need for any rail commuter to ever drive through that neighborhood.

**(1-2-19-2-176, 1):** [See figure provided in Exhibit 176]

**Response:** The proposed station designs included in the Draft EIS, Section 2.3, Build Alternatives, locate the Potomac Greens pedestrian/bicycle bridge close to the station to facilitate the ability of Metrorail passengers to access the station via walking and bicycle. A separate pedestrian bridge located at the south end of the Potomac Greens neighborhood would significantly lengthen the average walking distance to the station for Potomac Greens residents and would also require the construction of a third pedestrian bridge over the Metrorail and CSXT tracks (in addition to the two bridges providing pedestrian access to the Metrorail station from Potomac Yard). (1-2-19, 1)

**(1-2-19-2-15, 1):** I like Alternative B the most [...]

If Alternative A adopted, strongly recommend providing ample bike parking at the northern end of Potomac Green and bike facilities along Potomac Greens Drive, including a Capital Bikeshare station on both sides of the Metro station (note the existing bikeshare station on the south end of Potomac Greens (near Slaters). I presume that on-street parking in Potomac Greens will have to immediately become restricted due to proximity to Metro; perhaps fees from residential parking permits could be used to pay for new bike facilities/Capital Bikeshare expansion.

**(1-2-19-2-21, 1):** I am also writing to ask that the station be designed to allow 24-hour bicycle access between Potomac Yard and Potomac Greens.

I see more and more everyday biking in Alexandria. Surveys show that 70 percent of citizens are interested in bicycling to run errands and for fun. However, most are afraid to do so because social pressure (they don't want to yelled at or honked at) or perceived danger. As facilities for everyday biking improve, more and more of these folks get out and ride. Let's please have a forward-looking Metro Station design that accommodates this very real need.

**(1-2-19-7-145, 1):** Please ensure there is thought put into bicycle access to the station under whatever alternative gets selected.

**(4-2-19-1-231, 1):** My husband and I purchased our home in Potomac Greens about nine years ago and that was primarily based on a very promising outlook for a Metro station. In addition, there was a promise of a pedestrian bridge that would connect our end of the neighborhood over to all of the rapidly-planned development over in Potomac Yard. Now that that pedestrian bridge has been rolled into the plans for the Metro, we are very much awaiting the infrastructure of the station in order to connect the neighborhood over to all of that development [...]

One particular aspect of the design that I did want to address is the bike amenities. It's been mentioned the City -- I'm very proud that the City has demonstrated such a strong commitment to improved bike facilities over the last few years from the King Street bike lanes to Capital Bikeshare and even as recently as this week along Potomac Greens Drive which is great. It's imperative to me that the bike infrastructure be considered from day one in the design of the station, safe and comfortable routes to the station, ample and secure bike parking, and cabbie infrastructure. That will all ensure that the station is truly accessible to all and is part of a successful multi-modal transportation network.

**Response:** The Draft EIS, Section 2.4, Build Alternatives, notes that all station alternatives incorporate a pedestrian and bicycle bridge between the Potomac Yard and the Potomac Greens neighborhoods that will be open 24 hours a day. Bicycle parking facilities will be provided at each station entrance in accordance with Metro station access guidelines and design criteria. More detailed design of these facilities will be included in future project design phases after the conclusion of the NEPA review process. The City of Alexandria is responsible for planning bicycle access between the station and surrounding origins/destinations. All comments received on the Draft EIS have been reviewed by the City of Alexandria. (1-2-19, 2)

### 5.5.2.2 City Parks Impacts

**(2-2-66-5-137, 1):** Build Alternative B, though not the most intrusive of the build alternatives, will have temporary and permanent impacts on this park. The Draft Environmental Impact Statement indicates that one station exit will be located in the northern end of Potomac Yard Park. If it is not possible to move the station outside of the park during final station design, we ask that mitigation measures be taken to minimize the impact of this intrusion into the park.

**Response:** For the preferred alternative, the Final EIS will describe proposed mitigation measures for impacts to City parklands. (2-2-66, 1)

### 5.5.2.3 Construction Impact

**(1-2-29-1-88, 1):** I live on the northern-most block of Carpenter Road, near the City Park located in Potomac Greens [...] This area will feel the greatest effects from the Metro project with construction noise, pollution, both light and other forms, emissions, vibrations, the movement of heavy equipment, et cetera.

**(1-2-29-1-90, 1):** Mitigating constructing impact is extremely important.

**(1-2-29-7-144, 1):** If Alt B option 2 is selected - consideration must be given to the children in neighborhood, narrow roads, and speed of construction vehicles / impact to residents for parking (construction workers), environments (trash + restroom facilities - these can be an eye sore and impact the neighborhood appearance and safety).

**(1-2-29-8-129, 1):** As a homeowner who lives on Potomac Greens Drive in the Potomac Greens community, the only metro alternative that I support is B-CSX due to the serious and undesired negative impacts of Alternative A and B on my neighborhood and the value of my home. Most notably I oppose A because it will be in my front yard - literally, and I oppose A and B because of the construction traffic on my street.

**(1-2-29-2-160, 1):** If Potomac Greens Drive is the only viable construction route to the proposed station, how is construction noise/traffic going to be mitigated? How will affected residents be compensated for the next 2+ years of construction. Unannounced night time track work already keeps many neighbors awake. Increased construction traffic will also present safety issues for many neighbors, especially those with small children.

**Response:** The Draft EIS, Section 3.24, Construction Impacts, describes potential impacts and identifies broad minimization and mitigation measures for impacts such as those stated in the comments. All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision. At this stage of project design, further details regarding the levels, duration, and frequency of construction-related noise, vibration, and fugitive dusts are not available. Project development during the design phase will further define efforts to minimize construction impacts and, for unavoidable impacts, will define methods to restore resources to their prior condition.

Regarding construction traffic, further details of the mitigation measures will be developed during the final design phase of the project when details of the project components and the construction scenarios are finalized and a Transportation Management Plan (TMP) will be developed. The TMP will address construction activities related to the project as well as permanent station operations and will be prepared in coordination with VDOT, the City of Alexandria, and other agencies as applicable.

The City of Alexandria on May 20, 2015 adopted Build Alternative B with Construction Access Option 2 (no access from the GWMP roadway) as the preferred alternative for the project, which will be carried forward in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-2-29, 1)

**(2-2-29-5-137, 1):** The Commission strongly recommends that Construction Access Option 2 be selected in order to maintain the existing viewshed from the George Washington Memorial Parkway. The temporary convenience of construction access from the GWMP is far outweighed by the long-lasting degradation of the user experience.

**Response:** With regard to minimizing construction impacts to the George Washington Memorial Parkway: The City of Alexandria on May 20, 2015 adopted Build Alternative B with Construction Access Option 2 (no access from the GWMP roadway) as the preferred alternative for the project, which will be carried forward in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision. Project development during the design phase will further define efforts to minimize construction impacts and, for unavoidable impacts, will define methods to restore resources to their prior condition. (2-2-29, 1)

**(6-2-29-2-169, 1):** The construction access proposed for Site B includes the WMATA Access Road which is Old Town Greens Townhome Owners Association (OTGTOA) property. The WMATA easement over this OTGTOA property is "...solely for the purpose of providing WMATA's emergency, maintenance and transit police vehicles ingress and egress between the WMATA substation and Potomac Greens Drive." The easement does not include access for any other vehicles or for construction purposes. OTGTOA has not consented to construction access over the WMATA Access Road for construction of a Metro Station and WMATA does not have a valid easement.

**Response:** With regard to project construction access within the Old Town Greens neighborhood: Appropriate access arrangements will be obtained for all affected properties prior to construction. (6-2-29, 1)

### 5.5.2.4 Cultural Resources

**(1-2-12-1-78, 1):** Fixing up Dangerfield Island is laudable, but it's not part of the purpose of the George Washington Memorial Highway, and in no way compensates for the degradation of the parkway that will transpire.

Let me then go onto the meaning of the George Washington Memorial Parkway. It is in no small measure, thanks to George Washington, that one end, and the city the bears his name on the other, and his significance in the American culture that created the need for the George Washington Memorial Parkway. And when it was created, Alexandria lobbied hard to have it run through Alexandria and promised to maintain it in such a condition because Alexandria was in a most dilapidated form. It saved and created Alexandria that we know today.

As a matter of fact, the George Washington Memorial Parkway is not a neglected step, but rather the impetus, because the entire historic district was created to protect the George Washington Memorial Parkway. And that was Alexandria's promise because we had become so bad that the Federal Government threatened to move it. It is what puts us on the map.

**(1-2-12-1-81, 1):** It's a tragedy when we lose parkland. We don't have enough anywhere in the city, but Option B impinges on the parkway. So much so that we will have to add to its cost, the millions of dollars that we will have to pay the Park Service to compensate for the damage we are doing to the George Washington Parkway.

Even if you don't care at all about American history, and I do, it's a wonderful drive, the nicest one in the city. Everyone in the city who travels it enjoys it and we should not even consider impinging upon it.

**(1-2-12-1-82, 1):** Site B, though, does work for the economics of the vision for the city. And while I appreciate that it impinges into the parkland, and there are historic reasons not to do that, but I would say that if you build at Site B, then it is incumbent upon you to fully restore the wetlands and the land around it. And that's going to cost money, so plan on it. And what you build there should not look modern, it should be maybe something if you were going down a country road in George Washington's time, this is the kind of building you might see. So that you don't actually perceive that there's a Metro; there's just a building there that is, perhaps, more historically appropriate. It may cost more to build. If it's made out of stone, it would provide that wall that was being requested by the earlier speaker. So I think that if you're going to make a commitment to Option B, Mayor Euille and the City Council, then you also need to really stand up and commit that you're going to spend the money to restore the lands, to build the appropriate historical building effectively so that when it's all done, it looks right.

This is very similar to -- I mean, when things are rebuilt in the historic district, we don't require them to be historic through the entire construction process. They have to be historic when it's done. And so I think we should take the same approach with Option B.

**(1-2-12-8-218, 1):** George Washington's residence at Mount Vernon and the city that bore his name could be dismissed as cultural icons, if it were not for his importance to the American heritage. The two became intertwined through not only George Washington, but also by the road connecting the two. This connection was so great, that early writers described how "every patriotic American who visits Washington makes a pious pilgrimage to the home and tomb of the Father of his Country. The road, however was at some spots little more than wooded trails.

Consequently, in 1887 Edward Fox came up with the idea to create a National Highway from Washington DC to Mount Vernon, which was finished in 1932 to mark George Washington's Bicentennial. Congress envisioned that the Parkway (or ways through or between parks) would be distinguished from highways or ordinary streets by the dominant purpose of recreation rather than movement; restricted to pleasure vehicles, and arranged with regard for scenery, topography and similar features rather than for directness.

In order to get the Parkway to go through Alexandria, they entered into a 1929 agreement with the Federal Government promising to keep the memorial character of the Parkway. However, by 1946, Alexandria had fallen off the memorial wagon (so to speak), so the Federal Government indicated that the Parkway was to be moved away from Alexandria. At this point, the City of Alexandria offered to create a historic district to protect the Parkway, which would then continue to traverse through Alexandria.

The George Washington Memorial Parkway is one of the finest federal parks in the United States, it uniquely incorporates the beauty of the District of Columbia with the marvels of nature. It is also the reason that the City of Alexandria has a historic district, which was created in 1946 to protect the integrity and purpose of the parkway. Furthermore, the designers wanted to create a magnificent entranceway into the City and put in easements to achieve it. Every guest who has visited us has remarked on the beauty of this entranceway into the City of Alexandria.

Option B is clearly visible from the Parkway, and it will largely extinguish the special entrance, especially with the 500 ft. long and very high bridge from the Yard to the metro stop that runs practically parallel to the Parkway. The Park Service has entered into an agreement under significant political pressure, and while fixing up Dangerfield Island is laudable, it is not part of the purpose of the George Washington Memorial Highway, and this in no way compensates for the degradation of the parkway that will transpire. Furthermore, the notion that option A is as visible and obtrusive to the parkway is absurd.

The George Washington Memorial Parkway is not a neglected stepchild, but rather the impetus for the entire Historic District, and by inference, it is responsible for Alexandria's place on the tourist maps. It inculcates a heritage that warrants sharing with the world, as people from all over the globe make a pilgrimage from Washington D.C. to Mount Vernon to pay their respects to the Father of this Country. The Parkway also represents a trust placed on the City by the Federal Government that it would maintain the highway for the purpose and dignity it was envisioned to convey.

So, does it make sense for Alexandria to incur greater risk, pay higher debt servicing costs, and destroy its cultural and scenic heritage for the equivalent of less than the distance of three City blocks in Old Town? Does it make sense for the rest of us to surrender and diminish the purpose of federal parkland in the form of the George Washington Memorial Parkway because the City of Alexandria decided it wants to use the "wasted space"?

And, did it make sense for our Federal Delegation to put so much pressure on the National Park Service to give up this Historic and cultural heritage (not to mention parkland) in order to move the Metro station less than distance of three City blocks in Old Town?

**(1-2-12-8-220, 1):** History of the George Washington Memorial Parkway

No words can adequately express just how important the first president was in uniting a young nation. George Washington's residence at Mount Vernon and the city that bore his name could be dismissed as cultural icons, if it were not for his importance to the American heritage. The two became intertwined through not only George Washington, but also by the road connecting the two. This connection was so great, that in "Historic Buildings of America as Seen and Described by Famous Writers", Arthur Shadwell Martin relates how "every patriotic American who visits Washington makes a pious pilgrimage to the home and tomb of the Father of his Country. "But, haste was out of the question," the Family Magazine related in 1837, "for never was worse road extant than that to Mount Vernon." Departing from Alexandria, the road to Mount Vernon went inland, rather than along the river as it does today. There was scarcely a glimpse of the scenic Potomac. Instead, one was required to traverse two large hills on an inland road in various state of disrepair that sometimes was more like a wooded trail.

Caroline Gilman described it in her book, "the Poetry of Travelling" as being "intolerably bad," and that "no one probably passes it without thinking before he arrives at Mount Vernon, that he has paid too dear for his whistle." The City of Alexandria fared no better than the road, having also fallen on hard times. Many authors described it as a dilapidated little town where "no one wishes to linger." Nevertheless, the importance of Mount Vernon was growing in the national conscience, even bringing forth calls for the government to take it over. While the family of George Washington had graciously accepted visitors for many years, they eventually could not manage the upkeep of the Mansion.

To save this landmark, the Mount Vernon Ladies Association was created in 1856 as the first historic preservation effort in America. It raised enough money to purchase the property two years later. Although, roads existed to Mount Vernon, they were neither the original one, nor ones that lent themselves to contemplative or pleasurable drives. Consequently, in 1887, in an article he wrote for the National Republican (a DC paper), Edward Fox came up with the idea to create a National Highway from Washington DC to Mount Vernon. Fox called for the "making of a splendid drive, a grand avenue and 100 feet wide that was properly graded and shaded between the capital city of the nation and the tomb of its great founder."

Building on the enthusiasm of the Fox article, in 1888, Mayor John B. Smoot of Alexandria founded the Mount Vernon Avenue Association in Alexandria to promulgate the creation of a national road to George Washington's home. The road would travel through Alexandria on the basis that many existing establishments were there when George Washington walked these streets. Since fortune had bypassed Alexandria, the buildings were still there. The Mount Vernon Avenue Association appealed to Congress the following year, which then really got started with trying to design this. They appropriated money for a Colonel Haines to come up with three routes (one of which came through Alexandria). No matter which route was selected along the Potomac, Haines intended it always to be in the process of development and embellishment. Envisioned as having a monumental character, the proposed "National Road", was a symbolic link between Mount Vernon Estate, the site so closely associated with George Washington, and the city that bore his name. Congress, unfortunately allocated no further money.

By 1898, the Centennial of the Nation's Capital was impending, so a group of citizens approached President McKinley about a plan for celebrating the event. This eventually resulted in the creation of the McMillan Senate Park Committee in 1901-1902, which was one of the most important committees in the nation's history, and which was named for Senator James McMillan of Michigan, Chairman of the Senate Committee on the District of Columbia. Park enthusiasts, historians, and planners in Washington, DC, often invoke the great and expansive vision of the McMillan Plan as the conceptual underpinnings of today's National Mall and Washington, D.C.'s Park System.

Although the McMillan Commission did not directly deal with it, they very specifically addressed the need for and importance of having a road leading to the home of the father of our nation. The McMillan Senate Park Committee had clearly been influenced by landscape architect pioneers Olmstead, Vaux, Cleveland, and Eliot, who are credited with creating the term "Parkway." The McMillan Committee envisioned that "these drives had certain definitions: Parkways or ways through or between parks; distinguished from highways or ordinary streets by the dominant purpose of recreation rather than movement; restricted to pleasure vehicles, and arranged with regard for scenery, topography and similar features rather than for directness".

Although WWI had taken its toll, interest in history (particularly Colonial and early American history) remained strong. The Bicentennial of George Washington's birth was the impetus for a 1924 committee formed by Congress, and in 1932, the road was constructed. The road did travel through Alexandria on what is now known as "Washington Street." In doing so, the City of Alexandria entered into a 1929 agreement with the Federal Government promising to keep the memorial character of the Parkway. However, by 1946, Alexandria had fallen off the memorial wagon (so to speak), so the Federal Government indicated that the Parkway was to be moved away from Alexandria. At this point, the City of Alexandria offered to create a historic district to protect the Parkway, which would then remain in Alexandria. That is the genesis of Alexandria's historic district. Over the years, there have been numerous battles back and forth between Alexandria and the Federal Government.

In 1999, Alexandria requested that the National Park Service provide a clarification as to the memorial nature of the Parkway. Many of the features from the National Park Service's response to the City of Alexandria were incorporated into the Washington Street Standards as we know them today. The George Washington Memorial Parkway is therefore the genesis of the Alexandria Historic District, which, in turn, has generated a significant tourism response. The George Washington Memorial Parkway (and the City of Alexandria) thus shares this heritage with the world, as people from all nations and walks of life pass through Alexandria to make a pilgrimage to Mount Vernon to pay their respects to the "Father of Our Country." The George Washington Memorial Parkway also represents a trust placed on the City by the Federal Government that Alexandria would maintain the highway for the purpose and dignity it that was envisioned to convey, and that the Historic District created as a quid pro quo would continue to protect this singular heritage.

To conclude, the George Washington Memorial Parkway, is not a neglected stepchild, but rather the impetus for the entire Historic District, and by inference, it is responsible for Alexandria's place on the tourist maps. It inculcates a heritage that warrants sharing with the world, as people from all over the globe make a pilgrimage from Washington D.C. to Mount Vernon to pay their respects to the Father of this Country. The Parkway also represents a trust placed on the City by the Federal Government that it would maintain the highway for the purpose and dignity it that was envisioned to convey. No person states this as well as did Caroline Oilman in 1838: "indeed, it is a curious step from Alexandria to Mount Vernon; the one teeming with the most worldly associations, and the other sacred to the highest feelings of our nature."

**Response:** Regarding impacts to historic resources: The Draft EIS, Section 3.9 Cultural Resources describes potential impacts to historic resources, such as the George Washington Memorial Parkway. Section 106 of the National Historic Preservation Act requires the Federal Transit Administration (FTA) to consider the effects of its actions on historic properties. FTA is responsible for compliance with Section 106 and initiated the review process with the Virginia Department of Historic Resources (VDHR). In addition to seeking the views of VDHR, FTA has invited certain organizations and individuals who have a demonstrated interest in the project, such as the National Park Service, to participate in the process. These organizations and individuals are referred to as Section 106 consulting parties, and review information relevant to the identification, evaluation and assessment of effects to historic properties that could result from the project. FTA and VDHR work with each other and the consulting parties to resolve project-related adverse effects to historic properties through a Memorandum of Agreement (MOA). The Final EIS will include details on proposed mitigation measures to address impacts to historic resources.

The Draft EIS, Section 3.8, Visual Resources, evaluates potential impacts to study area visual resources, including GWMP viewsheds. Build Alternative B would diminish visual quality within several GWMP viewsheds but this diminishment would lessen over time as replanted vegetation matures. Under the No Build Alternative, the continuous GWMP Corridor within the study area has a visual quality rating of Very High in 2016 and High in 2040 (due to the base level of new development planned within Potomac Yard regardless of the project). Under Build Alternative B, the continuous GWMP Corridor within the study area has a visual quality rating of High in 2016 (due to the encroachment of the station and track into some viewsheds) and High in 2040 (vegetation has matured within affected viewsheds).

The pedestrian bridges for all alternatives have been designed based on the minimum vertical clearance requirements above the CSXT railroad tracks. The Draft EIS, Section 3.8.4, Mitigation, states that station building design and materials will be refined during later project phases to mitigate impacts on visual resources.

Regarding Build Alternative B's visual impacts to the George Washington Memorial Parkway (GWMP) compared to those of Build Alternative A, the Draft EIS Section 3.8 Visual Resources evaluates the impacts from six GWMP viewsheds as well as from the continuous GWMP corridor in the study area. The narrative and the visual quality ratings list different impacts for Build Alternative A (Section 3.8.3.2) and Build Alternative B (Section 3.8.3.3) at several of the GWMP viewsheds.

As stated in the DEIS, Section 3.8.1, the Final EIS will incorporate additional visual analysis, including both summer (with foliage) and winter/fall (without foliage) photo renderings for all viewsheds, including new development constructed in Potomac Yard since the original analysis completed in 2012. This updated analysis will use the same viewshed locations as in the Draft EIS. (1-2-12, 1)

### 5.5.2.5 Financial Resources

**(1-2-9-1-83, 1):** Metro has endorsed the ideas of a new metro station on the system. How does this new asset factor into the long-term maintenance and funding for a station when Metro is faced with over 10,000 in maintenance backlog, the need to enhance an improve safety within the system; the second phase of the silver line Metro extension being 13 months behind schedule, and not expected to begin service until 2020; and Phase 1 of the silver line, now pegged at \$2.9 billion and continued replacement of older Metro cars with a new 7000 series? [...]

Also, what is the yearly tax revenue that the city receives from the shopping center and the movie theatre? What will the city do to make up for that lost revenue when the shopping center disappears? [...]

And on my personal view, it's either that or else, please put the monies into a more efficient bus system that's already available, which if it needed changes with the development of that area, would be much easier to change.

**(1-2-9-1-86, 1):** Alternative B faces a number of risks and problems, legal and financial, that are not fully identified. Others have spoken to that, but I think the point that's been made that for the EIS to be released and then shortly afterward for city staff to release a separate document that includes a very sketchy outline of a deal with the Park Service means that the EIS is not complete, and frankly, actually, one might say pointedly, bypasses some important information that should be included.

If I were the National Park Service, before I agreed to give up land that is theirs now, in return for promises from the City, I would want some commitment or some sense that I could rely on those promises, unlike, for example, the Eisenhower Connector. The City has some history of making promises to other agencies and then not coming through. In this case, it shouldn't happen.

I think the City does have a moral debt to the parkway and we should fulfill it. There's no need to take parkland for this to deal with the problems the city planning decisions have created. Over time, the problems that people anticipate with Alternative A will settle out. The revenues to the city will level out over time. The highest and best use for the areas immediately around, whichever location is selected will be built out and the City tax revenues will work out.

**(1-1-9-8-219, 1):** Option B is currently expected to cost the City \$13.9 million a year, or \$5.1 million more than option A.

On a more general note, the studies did not incorporate any value for the loss of scenic vistas. Also, and more acutely, the EIS should have specified the cost that the city will incur by losing the Potomac Yard Shopping Center, which is approximately \$14 million in sales revenue every year. Adding this cost raises the annual costs (not including the operational costs) of option B to over \$28 million per year.

Finally, the developer has expressed not only the desire to redo the whole plan, but also to pay a lot less than expected if he does get option B [...]

So, does it make sense for Alexandria to incur greater risk, pay higher debt servicing costs, and destroy its cultural and scenic heritage for less than the distance to the Alexandria Courthouse from City Hall....no

**(1-2-9-1-250, 1):** Option B's servicing cost is expected to be 5.1 million more than A.

On a more general note, the studies did not include any value for the loss of scenic vistas. More acutely, the EIS should have specified the cost that the City will incur by losing the Potomac Yard Shopping Center which is approximately \$14 million in sales revenue every year. These costs raise the annual expense of Option B above 28 million.

Finally, the developer has expressed not only the desire to redo the whole plan but also to pay a lot less than expected if he does get Option B.

**(1-2-9-8-221, 1):** The City of Alexandria is going to choose its newest "potential income generator," the Potomac Yard Metro Station. Just two choices merit consideration if the City chooses to continue with the Metro Station proposal. The "preferred site" lies on a scenic easement and government parkland (both of which were created to secure the picturesque perspective shed of the George Washington Memorial Parkway), while the alternate is situated on the site that was initially proposed for it more than 20 years back. However, there are three main issues with the "preferred site", since it is more distant than people think, more costly, and more destructive than the alternate [...]

This is a significant issue, since the expenses of building the stations are not equivalent. Even with a good deal of optimism, the annual debt servicing cost for option B the "preferred one", will be almost \$14 million or over \$5 million more expensive than the other. So, in order to present the more costly station as being more alluring, the study expects that it will create more density than the less expensive one (without any real basis to do so), and that the developer will pay more for that site, but the developer is now pulling back from this aspect of the "expensive" proposal.

Furthermore, the EIS should have specified the cost that the city will incur by losing the Potomac Yard Shopping Center, which is approximately \$14 Million in sales revenue every year. This cost should have been included in the analysis. Doing so raises the annual costs (not including the operational costs) of option B to over \$28 million annually.

**(4-1-9-1-243, 1):** In that capacity, I have sat through no fewer than three briefings of the same charts that you see in the staff report. My concern is that they lack the clear figures on how the station -- how much the station will cost the City's taxpayers and the assumptions that are the basis for this staff cost benefit analysis. Assuming, as I do, that the choice is between A and B, my preference is for A, not just because of the reduced impact to the Parkway but because of the savings and others will speak to that.

My major concern, however, is the approach that the owner of the North Potomac Yard has made to the City asking to reduce substantially its contribution from its agreed 49 million and to cut basically in half its upfront contribution. The developer also wants to redo the plan increasing the residential component presumably while reducing the commercial. The staff report blindly dropkicks that issue into next year after the Metro's decision is made.

The staff report claims the financing plan does not require the previously agreed contribution level to remain financially feasible. But again, it's short on specifics and I would recall that Ms. Pepper and I served for seven years on a committee that turned Cameron Station from a military base into the residential area that you see now. However, it was to be mixed use. There was to be a commercial retail and residential. When it came down -- push came to shove, it has been almost entirely residential with a little retail and no commercial. All of that meant net loss of revenues to the City. And if you look at all of the -- many of the developments that have occurred since then, for example, the Beauregard Plan is already beginning to unravel, home properties will not redevelop the seminary apartments and its \$10 million in amenities for the community. Hakimian has threatened to pull out of its property there. The hotel at Alexandria Gateway has been dropped reducing the benefit of that development to the City. What Euille seeks to build at Landmark significantly diminishes the tax prospects there.

Without knowing the current offer by the developer and his plans for North Potomac Yard, you cannot take an intelligent vote on the Metro site. Insist on knowing what the staff has been told about the -- what's been offered by the developer before you vote next Wednesday. Otherwise, you are buying the proverbial pig in a poke. This is possibly the most important decision the Council will make in this decade. You must make it on hard facts, not rosy scenarios and vague assurances.

**(1-1-9-1-246, 1):** Now, we have Option A which is no more than three blocks south of Option B. The estimated price difference between the two stations is 209 million for A and 268 million for B. Even if that were the entire cost differential, Option B costs several million more dollars for each block of separation. But those are not the only different costs. Debt service for Option B is 13.9 million annually. Debt service for Option A is 8.8 million annually. We have somehow persuaded the National Park Service to give us an easement over federal parkland degrading an important scenic route between Washington and Mount Vernon to create the tract alignment for Option B. We will, however, have to compensate the Park Service with about 12 million in projects the Park Service would like. Option A does not degrade the Parkway and does not have any of that cost.

... We are told that the build out of the shopping center will bring all the revenue needed to pay for our wealthy infrastructure debt. I think that is unlikely but even if it were true, the debt is the debt of our city and the debt of all its taxpayers. Owing such a big debt will limit our ability to borrow for other things that will become necessary, another public school, another fire station, maybe even some more parkland.

But the biggest warning sign about Option B, the fact that cries out to me "stop this before it's too late," is the unenthusiastic attitude of the landowners of the shopping center. They have no plan to terminate any of their leases on the Yard early. They are attempting now to renegotiate their contribution to initial infrastructure costs. They even want to revise the Small Area Plan adopted in 2010. If these investors really believed, as the proponents of Option B claim, that it will generate vast tax revenue for the City, would they not be hurrying to get the station built to rake in that money? This is like the canary in the coal mine. Why don't these people hanker for these billions -- millions that we're supposed to get with this build out? It's very frightening.

...And by the way, I know because she told me so one day in the work room. Vola Lawson (ph) hated tax increment financing. She told me that in 1997 with such vehemence that I have always remembered it. As we know -- -- Vola was as good as it gets as budget.

**Response:** Regarding financing for the project: The Draft EIS, Chapter 5, discusses project costs and funding, based on information current as of March 2015. The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria. As discussed in Chapter 5 of the Draft EIS, the project would be financed by a variety of funding sources through a Potomac Yard Metrorail Station Fund, which includes net new tax revenues and developer contributions as well as special tax district funding. The potential funding sources do not include tax increment financing. In addition, the City continues to evaluate opportunities for Federal and state funds. The Station Fund revenues will be accounted for separately from other City general revenues. The City of Alexandria's detailed financial feasibility analysis for Build Alternative B and factors for the selection of Build Alternative B as the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)).

With regard to other major capital needs of the Metrorail system, including addressing deferred maintenance, Metro's Momentum strategic plan lays out recommendations and funding needs to address them through the year 2025. As described in the Draft EIS, Section 5.2.1, the new station would add system-wide operating costs to Metrorail. The majority of the operating funds come from the annual operating subsidy provided by member jurisdictions of the WMATA Compact.

With regard to the existing shopping center, the Draft EIS, Section 3.4 Land Use and Zoning, states the impacts of the Build Alternatives on surrounding uses. Neither Build Alternative A nor Build Alternative B would displace the existing shopping center or movie theater. Under Build Alternative B, the northern station entrance would touch down on a portion of the shopping center parking lot that, in the future, is planned for redevelopment and open space as part of a dense mixed-use development incorporating a Metrorail station entrance. The Draft EIS, Section 2.1, Local Planning Process, summarizes City of Alexandria small area planning for North Potomac Yard, which includes the existing Potomac Yard Shopping Center. The City's adopted North Potomac Yard Small Area Plan envisions the replacement of the retail center with a high-density, transit-oriented neighborhood, including 7.525 million square feet of office, retail, residential, and hotel uses. (1-1-9, 1)

**(1-2-9-1-81, 1):** It's a tragedy when we lose parkland. We don't have enough anywhere in the city, but Option B impinges on the parkway. So much so that we will have to add to its cost, the millions of dollars that we will have to pay the Park Service to compensate for the damage we are doing to the George Washington Parkway.

**(1-2-9-1-82, 1):** Site B, though, does work for the economics of the vision for the city. And while I appreciate that it impinges into the parkland, and there are historic reasons not to do that, but I would say that if you build at Site B, then it is incumbent upon you to fully restore the wetlands and the land around it. And that's going to cost money, so plan on it.

**Response:** The Draft EIS, Section 5.1.1, Capital Cost Estimate, provides preliminary cost estimates for the Build Alternatives. The cost of mitigation, including wetlands replacement and soil mitigation, is included in the cost estimates. Refined cost estimates will be developed as the project advances into the implementation phase. The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria. The City of Alexandria's financial feasibility analysis for Build Alternative B and factors for the selection of Build Alternative B as the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). (1-2-9, 1)

**(1-2-9-1-88, 1):** My Association covenants also indicate that the residents of Potomac Greens will be responsible for 50 percent of the maintenance and upkeep of the bridge when it is complete. So what will be the cost of the bridge to construct? What will be the annual maintenance cost since the bridge will have both escalators and elevators, according to renderings?

**Response:** The Draft EIS, Chapter 5, discusses project costs and funding. Neither the cost to construct the individual pedestrian bridge nor the cost of maintenance of the bridge, as stand-alone charges, has been estimated. The City of Alexandria, as the project sponsor, is aware of your concern and has met with the homeowners association to discuss this matter further. (1-2-9, 2)

### 5.5.2.6 Flooding and Stormwater Management

**(2-2-34-5-137, 1):** Lastly, the Commission is concerned about the increase in impermeable surfaces in the Potomac Yard area with the addition of the proposed Metrorail Station. Impermeable surfaces contribute to the pollution of surface water and do not permit the water table to be naturally recharged, among other ill effects. True beautification of the City requires careful consideration of the environmental impact of the new development, and we request that the final design of the Metrorail Station incorporate permeable surfaces to the greatest extent possible.

**Response:** The Draft EIS, Section 3.13, Water Quality, states that although additional impervious surface and runoff would result from Build Alternative B, the project would adhere to water quality performance management criteria set by the City of Alexandria in accordance with Sec. 13-109 § (5) of the City Zoning Ordinance, which control the rate and water quality of stormwater runoff. These existing stormwater management plans and practices in the City of Alexandria would minimize potential impacts from increases in impervious surface. The project will comply with Executive Order 11990, which addresses the no net loss of wetlands in reference to their flooding and stormwater management benefits, and with Executive Order 13690, which contains a new Federal Flood Risk Management Standard.

In addition, Draft EIS, Section 3.19, Sustainability, states that Build Alternative B will be designed consistent with the local sustainability requirements. Station design features that comply with green building policies and objectives, such as LEED Silver Certification, would be developed during detailed design phases of the project. A commitment to incorporate resiliency measures for foreseeable cumulative climate change impacts, in particular flooding, will be added to the Final EIS, including elevation of structures above the 500-foot floodplain. (2-2-34, 1)

### 5.5.2.7 GW Parkway Aesthetics

**(1-2-10-1-78, 1):** The construction of the George Washington Memorial Parkway included easements to obscure the railroad yard to ensure the creation of a beautiful vista as one entered the City of Alexandria. The current arrangement is not included in the EIS, except for a monetary amount devoted to the trail and Dangerfield Island. Fixing up Dangerfield Island is laudable, but it's not part of the purpose of the George Washington Memorial Highway, and in no way compensates for the degradation of the parkway that will transpire.

**(1-2-10-1-82, 1):** And what you build there should not look modern, it should be maybe something if you were going down a country road in George Washington's time, this is the kind of building you might see. So that you don't actually perceive that there's a Metro; there's just a building there that is, perhaps, more historically appropriate. It may cost more to build.

So I think that if you're going to make a commitment to Option B, Mayor Euille and the City Council, then you also need to really stand up and commit that you're going to spend the money to restore the lands, to build the appropriate historical building effectively so that when it's all done, it looks right.

**(1-2-10-8-136, 1):** Option B is clearly visible from the Parkway, and it will largely extinguish the special entrance, especially with the 500 ft. long and very high bridge from the Yard to the metro stop that runs practically parallel to the Parkway. The Park Service has entered into an agreement under significant political pressure, and while fixing up Dangerfield Island is laudable, it is not part of the purpose of the George Washington Memorial Highway, and this in no way compensates for the degradation of the parkway that will transpire. Furthermore, the notion that option A is as visible and obtrusive to the parkway is absurd.

On a more general note, the studies did not incorporate any value for the loss of scenic vistas.

Finally, the more expensive, station will create a wholesale destruction of the view shed of the George Washington Memorial Parkway. The required longer bridge has minimum height requirements that (with its location and length) will make it a significant intrusion on scenic vistas from the George Washington Memorial Parkway.

**(1-2-10-1-250, 1):** The George Washington Memorial Parkway is one of the finest federal parks in the United States that uniquely incorporates the beauty of DC with the marvels of nature. It is also the reason we have the historic district which was created in 1946 to protect the integrity and purpose of the parkway.

Furthermore, the designers wanted to create a magnificent entranceway into the City and exerted great effort into achieving it. Every guest who has visited us has remarked on the beauty of this entranceway.

Option B is clearly visible from the Parkway and will largely extinguish the special interest, especially with the 500-foot very high bridge that almost parallels the Parkway. The National Park Service entered into an agreement under significant political pressure and while fixing up Dangerfield Island is laudable, it is not a part and purpose of the Memorial Parkway and in no way compensates for the degradation of the Parkway that will transpire [...]

On a more general note, the studies did not include any value for the loss of scenic vistas [...]

The George Washington Memorial Parkway is the impetus for the entire historic district and by inference, the response -- is responsible for Alexandria's place on the tourist maps. It inculcates the heritage that warrants sharing with the world as people from all over the globe make a pilgrimage from Washington, DC to Mount Vernon today their respects to the father of this country. The Parkway also represents a trust placed on the City by the federal government that it would maintain the highway for the purpose and dignity it was envisioned to convey.

Option B also sets a dangerous precedent for diminishing the support and protection of federal parks, so it doesn't make sense for Alexandria to incur greater risks, pay higher debt servicing costs, and destroy its culture and scenic heritage for less than the distance to the Alexandria Courthouse from here. No.

And I would just add if someone in the West was using federal park land, came in with a suggestion that we want to put railroad tracks on federal park land and we want to build something on a scenic easement and then we'll give you money to run your operating budget -- the person that came up with that idea many years ago was James Watt -- and I think it's a darn shame that the Park service went along with this. Thank you.

**Response:** The Draft EIS, Section 3.8, Visual Resources, evaluates potential impacts to study area visual resources, including GWMP viewsheds. Build Alternative B would diminish visual quality within several GWMP viewsheds but this diminishment would lessen over time as replanted vegetation matures. Under the No Build Alternative, the continuous GWMP Corridor within the study area has a visual quality rating of Very High in 2016 and High in 2040 (due to the base level of new development planned within Potomac Yard regardless of the project). Under Build Alternative B, the continuous GWMP Corridor within the study area has a visual quality rating of High in 2016 (due to the encroachment of the station and track into some viewsheds) and High in 2040 (vegetation has matured within affected viewsheds).

The pedestrian bridges for all alternatives have been designed based on the minimum vertical clearance requirements above the CSXT railroad tracks. Build Alternative B also has a long retaining wall along the eastern side of the station and realigned track; this retaining wall was included in the original visual resources analysis but will be more clearly indicated in the Final EIS.

Regarding Build Alternative B's visual impacts to the George Washington Memorial Parkway (GWMP) compared to those of Build Alternative A, the Draft EIS Section 3.8 Visual Resources evaluates the impacts from six GWMP viewsheds as well as from the continuous GWMP corridor in the study area. The narrative and the visual quality ratings list different impacts for Build Alternative A (Section 3.8.3.2) and Build Alternative B (Section 3.8.3.3) at several of the GWMP viewsheds.

As stated in the Draft EIS, Section 3.8 Visual Resources and Section 3.9 Cultural Resources, measures to minimize and mitigate the project's visual impacts to the George Washington Memorial Parkway will be developed in coordination with the National Park Service, City of Alexandria, Virginia Department of Historic Resources, and other consulting parties for the review of the project for consistency with Section 106 of the National Historic Preservation Act. These measures will be described in the Final EIS and implemented through a Memorandum of Agreement as part of the NEPA and Section 106 processes.

As stated in the DEIS, Section 3.8.1, page 3-53, Lines 1371 through 1321, additional visual analysis to use a single source of renderings will be completed as part of the Final EIS. The Final EIS analysis will use the same photograph digital renderings for the No Build Alternative and for the preferred alternative, including both summer (with foliage) and winter/fall (without foliage) renderings for all viewsheds. The Final EIS analysis will be updated to include new development constructed in Potomac Yard since the original analysis completed in 2012. This updated analysis will use the same viewshed locations as in the Draft EIS.

The Final EIS will include additional information on the value of scenic vistas and additional measures to mitigate impacts to viewsheds. Key architectural design refinements, such as modifications to the retaining wall, fill areas around the station, and resulting station height relative to grade level, will be included in the FEIS and its impact evaluations. Additional minor refinements will be specified in the Record of Decision.

(1-1-10, 1)

### 5.5.2.8 GW Parkway Environmental Mitigation

**(1-2-11-1-85, 1):** The DEIS and the alternative proposals have significantly changed since it was released for public comment on April 3. City and federal officials have mutually agreed that only Alternatives A and B are financially feasible. In addition, the National Park Service has given notice it would not object to the City's preferred Alternative B and they have reached an agreement on a package of land trades to help mitigate some of the damage to the parkway.

In effect, the recent announced agreements have negated the DEIS that's currently out for public comment. I ask that the following steps be taken:

- 1) The DEIS be amended to incorporate the new information dramatically changing the alternatives being considered and measures for mitigating impacts to the parkway.
- 2) The mayor or city manager make a public announcements on terms of a proposed agreement with the National Park Service and other cooperating federal agencies.

3) The city staff should delay announcing their preferred alternative until they have considered comments from citizens.

4) The city should provide more detailed information on the proposed agreement with the National Park Service and the commitment of \$12 million for improvement of the Mount Vernon Trail and Dangerfield Island.

**Response:** Regarding potential impacts to natural resources within the George Washington Memorial Parkway, as described in the Draft EIS: The Final EIS will provide additional details on proposed mitigation measures for impacts to the George Washington Memorial Parkway, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsible agencies, such as the Virginia Department of Historic Resources. Key architectural design refinements, such as modifications to the retaining wall, fill areas around the station, and resulting station height relative to grade level, will be included in the FEIS and its impact evaluations. Additional minor refinements proposed for mitigation of project impacts will be specified in the Record of Decision.

For responses regarding comments on general NEPA Process and Methodology, see Section 5.5.5.24. (1-2-11, 1)

### 5.5.2.9 Land Use

**(1-2-20-1-78, 1):** And then let me go to the -- on the analysis portions between Option A and Option B. When you look at it, we're really talking 500 feet. In Option B, it not within a quarter-mile radius, not even close. The landing pad is barely within a quarter-mile, but yet the report keeps maintaining falsehood. And not only that, the report does not include the 28 -- the \$14 million that will be lost from the revenue that is currently generated from the sales taxes over at the Potomac Yard Shopping Center.

**Response:** With regard to land use in proximity to the alternative station locations, the Draft EIS, Section 2.5.3, Support for Project Purpose and Need, assessed the number of residents within 1/2 mile and number of employees within 1/4 mile of the proposed station entrances in 2040 based on approved development plans. In addition to the stations' proximity to planned development blocks, the estimates also account for the different levels of development permitted under each alternative based on approved plans and the resulting differing densities of development blocks within North Potomac Yard under each of the alternatives.

Regarding the difference in location of Build Alternatives A and B with respect to the high-density development in North Potomac Yard: when measured using walking distances (along pedestrian bridges and sidewalks) from the station faregates (inside the northern end of each station building) to the center of the planned high-density office/retail area (near the northeast corner of the current Target store), Build Alternative B is 800 feet away while Build Alternative A is 1,650 feet away, a difference of 850 feet.

With regard to planned density and zoning regulations, the Draft EIS, Section 2.1, Local Planning Process, and Section 3.5, Consistency with Local Plans, describe the City of Alexandria's plans for the Potomac Yard area, including the types and intensities of development and open space recommended in adopted plans. Section 3.4.3.7, Zoning, describes the amount of development allowed under each Build Alternative based on adopted regulations.

The City of Alexandria's factors for the selection of Build Alternative B as the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). (1-1-20, 2)

### 5.5.2.10 Metroway and Other Bus Services

**(1-2-31-1-245, 1):** I am speaking in favor of the no build option. This Metro Station Plan B is a Metro Station built on hope, and hope is an iridescent phantom that flies through the night but disappears with the dawn, with the first ray of sun. The Metroway Bus Rapid Transit is a first class service. When the full infrastructure is built in Arlington County, this service, over time, will come to be recognized as the high-quality bus rapid transit that it is and it obviates the need for a Metro station. This -- you are paying a penny for this Bus Rapid Transit and it will, over time, give you a dollar of value. Don't throw away this wise investment that you have made to chase the foolish idea of a Metro Station.

**Response:** The Draft EIS Section 1.3, Project Purpose and Need, describes the role of Metroway in the project study area and the need for new transit services, in addition to Metroway, to accommodate the area's forecast increase in travel demand and to provide a direct access point to the regional transit system within Potomac Yard. (1-5-31, 1)

#### 5.5.2.11 NEPA Process and Methodology

**(1-2-33-1-78, 1):** Let me start with what some of the deficiencies I think are in the EIS. It does not include the agreement between the City of Alexandria and the Park Services regarding compensation for using scenic easement and federal parkland to build on Option B [...] The construction of the George Washington Memorial Parkway included easements to obscure the railroad yard to ensure the creation of a beautiful vista as one entered the City of Alexandria. The current arrangement is not included in the EIS, except for a monetary amount devoted to the trail and Dangerfield Island.

**(1-2-33-1-86, 1):** Alternative B faces a number of risks and problems, legal and financial, that are not fully identified. Others have spoken to that, but I think the point that's been made that for the EIS to be released and then shortly afterward for city staff to release a separate document that includes a very sketchy outline of a deal with the Park Service means that the EIS is not complete, and frankly, actually, one might say pointedly, bypasses some important information that should be included.

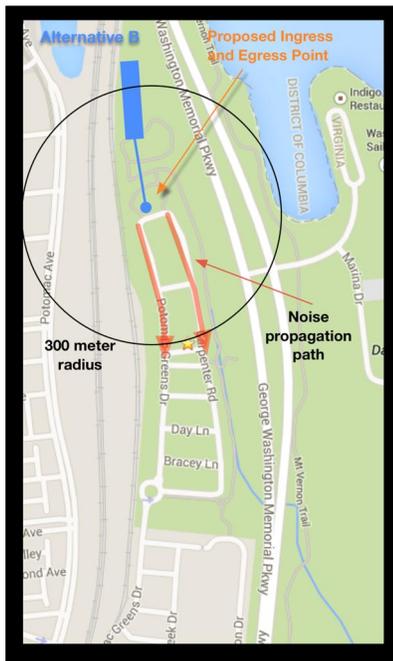
**Response:** The Final EIS will incorporate any new information affecting the project since the publication of the Draft EIS and will be released for public review. Any additional agreements made between the cooperating agencies will be included in the Final EIS and is required as part of the Record of Decision (ROD). (1-1-17, 1)

#### 5.5.2.12 Noise

**(1-2-4-2-23, 1):** Of equal concern, a preliminary audio analysis shows that the "loudness" level of noise from traffic alone could increase by 8 times, resulting in a greatly diminished quality of life, potentially property values as well, and possible health hazards [...]

The following graphic illustrates how this noise could propagate throughout the neighborhood. There are some architectural features of the neighborhood that influence noise propagation:

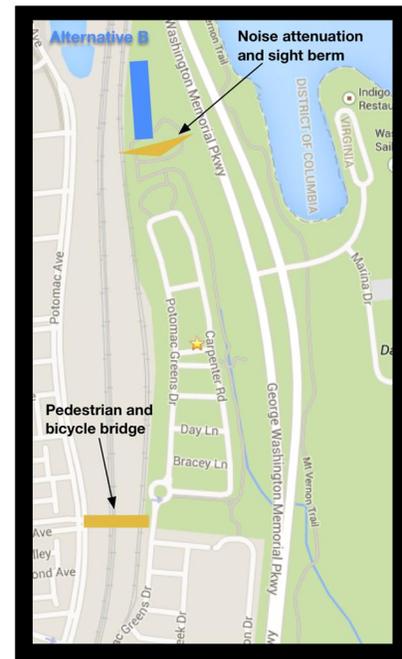
1. The near seamless, connected front elevations of town homes on each side of Potomac Greens Drive form a sort of "audio hallway" in which sound can travel. Because the exterior surfaces of the homes are either brick or wood, sound waves are easily reflected.
2. Streets that run perpendicular to Potomac Greens can also experience noise as it can be reflected from the Potomac Greens "audio hallway" at some level down these streets.
3. Depending on how the Potomac Yard station is constructed, unless there is an effective audio barrier between the station and the neighborhood, sound can travel unimpeded from the station down a near straight sight--line on to Potomac Greens Drive.



There are two courses of action that can be taken *with Alternative B* that would mitigate the tremendous noise problem, reduce potential health problems, as well as keep the traffic in the Potomac Greens neighborhood at current levels:

*Eliminate the Potomac Greens ingress/egress and walkway planned for Potomac Greens Drive. Instead, as required by an agreement between the developers of the neighborhood and the city, build a pedestrian/bicycle bridge across the rail lines near the point of the Potomac Greens traffic circle.*

Build a noise attenuation berm between the station and the neighborhood. The south facing berm would be a hill, planted with native shrubbery and a tree line across the top. The north side of the berm (facing the station) would be a hard concrete wall that would serve to reflect station noise *northward and away from the neighborhood.*



These proposed changes would be located as shown in the graphic below:

This proposed approach has the following benefits:

1. It eliminates any reason for a commuter to drive through the Old Town Greens or Potomac Greens neighborhood to enter or depart the Potomac Yards Metrorail station. *This keeps traffic in the neighborhoods at their current level.*
2. By eliminating this increase in traffic, the city does not impose an unacceptable noise burden on the residents of Potomac Greens, as the noise analysis shows would occur. *This helps preserve property values and avoid noise related health issues.*
3. Constructing the promised pedestrian and bicycle bridge provides the residents of Potomac Greens and Old Town Greens access to the Potomac Yards Metrorail station. As a point of reference, it should be noted that the *free* shuttle service to and from Braddock Metro Station being provided by the Potomac Greens HOA is transporting an average of about 35 people *per day*.
4. By constructing a noise and sight berm on the south boundary of the Alternative B location of the Potomac Yards Metrorail station, the city is preventing problematic noise propagation into the neighborhood as well as blocking the *current clearline---of---sight view* of the proposed Potomac Yard Metrorail station from along Potomac Greens Drive.

**(1-2-4-1-77, 1):** I'd like to confine my remarks this evening to the issue of noise relating to traffic that would travel to and from the proposed site through my neighborhood, Potomac Greens, under Alternative B. To keep my remarks focused on facts, based on the suggestions of city planners who have commented that the traffic and activity of the proposed Potomac Yard site would be equivalent to the existing Braddock Metro rail site, I elected to perform an audio site survey, a practice common to your own engineers, and compared the traffic noise pattern of Braddock station with the current noise levels of the Potomac Greens neighborhood.

I documented the instrumentation I used for the audio site survey, the methodology, the interpretation of the assessed results and a 13-page White Paper that I have submitted to the City, and have available tonight for those who might be interested. Here are the key findings.

- 1) Alternative B proposes building a covered walkway and a drop-off/pickup point at the northern-most end of our currently lightly traveled neighborhood. This drop-off/pickup point would generate significant increased traffic in our neighborhood. How much? Between one and-a-half and eight times the current level of noise.
- 2) The level of noise would adversely impact the quality of life of our neighborhood and potentially impact the value of our homes.

- 3) I measured noise from traffic, not trains, that exceeded 80 decibels. This presents an immediate health hazard to residents of the neighborhood. Neurologists have studies and documented the impact of noise levels that exceed 80 decibels on humans. It stimulates what is known as an auditory startle reflex, which includes increased heart rate, flow of adrenaline, and tightening of muscles. Repeated exposures to those noise levels produce stress and anxiety and other mental health problems, which our neighborhood does not need.

**Response:** Regarding potential noise effects of Build Alternative B: The Draft EIS, Section 3.12 discusses the noise assessment, which was prepared in accordance with FTA and WMATA criteria for assessing noise impacts from mass transit facilities and vehicles. For Build Alternative B, no noise impacts based on FTA and WMATA criteria are predicted at any sensitive receptors. However, other ancillary noise sources associated with the proposed station, such as Metrorail door chimes, train conductor announcements, station public address announcements, and brake noise, may be audible in the community as a new noise source but are not expected to contribute to any exceedance or noise impact, as the ambient noise levels are significantly higher. As a result, these ancillary sources were not included in the noise assessment but would be evaluated more closely during final design when the station features are finalized, and would be mitigated, as appropriate. Proposed mitigation measures include solid platform windscreens that would mostly enclose the platform area and help screen internal noise from the outside, and design of the station public address system with speakers at relatively close spacing, permitting lower audio volumes. All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision.

As noted in your comment, some additional vehicular trips may use local neighborhood streets to access the station for passenger drop-offs and pick-ups. Although these additional trips are not expected to degrade traffic conditions, they may be noticeable on streets that currently have very low traffic volumes. The noise assessment prepared for the Draft EIS concluded that vehicular traffic in the Potomac Greens neighborhood would not result in noise impacts to residences. The Final EIS will discuss potential measures, such as traffic calming, that the City of Alexandria may implement in coordination with local neighborhoods to address any localized increases in cut-through traffic that occur on local residential streets.

With regard to the findings of the audio site survey that the project would generate significant and potentially harmful levels of noise in the neighborhood, the Project Team is unable to assess the accuracy of the independent noise analysis due to the lack of supporting technical information provided in the comment and the analysis's use of different measurement types than those used by FTA and WMATA criteria, specifically:

- Neither calibration data nor field calibration verification data are provided;
- Data are presented in dB form rather than dBA;
- FTA criteria use Ldn (and occasionally Leq) measurements;
- Reponse protocol (fast versus slow) is unspecified;
- Reference pressure level is not provided; and
- FTA and WMATA criteria require the use of an ANSI sound meter.

The potential for an "audio hallway" that channels station noise south into the neighborhood along Potomac Greens Drive will be reviewed in the Final EIS.

With regard to the recommendation for constructing a landscaped earthen berm and retaining wall to reduce station noise impacts (as well as visual impacts) to the Potomac Greens neighborhood:

- For the proposed berm to be effective, it would need to be more than 50 feet in height to block station mezzanine noise and the view of the station. Such a structure would have a noticeable impact on the community aesthetics at the northern end of the neighborhood and would probably eliminate the existing park.

(1-2-4, 1)

**(1-2-4-8-98, 1):** However, I think recommendations and concerns voiced by residents of Potomac Greens, as they understand that space best and have made thoughtful suggestions, such as a noise wall, and better located pedestrian walkway.

**(1-2-4-7-143, 1):** Proponent for the Metro and highly encourage consideration/ selection of Alternative B – in addition – mitigate the existing noise impacts.

**Response:** Regarding potential noise effects of the project: The City of Alexandria adopted Build Alternative B as the preferred alternative for the project on May 20, 2015. Noise mitigation measures are discussed in Section 3.12.4 of the Draft EIS. For Build Alternative B, no noise impacts based on FTA and WMATA criteria are predicted at any sensitive receptors. However, other ancillary noise sources associated with the proposed station, such as Metrorail door chimes, train conductor announcements, station public address announcements, and brake noise, may be audible in the community as a new noise source but are not expected to contribute to any exceedance or noise impact, as the ambient noise levels are significantly higher. As a result, these ancillary sources were not included in the noise assessment but would be evaluated more closely during final design when the station features are finalized, and would be mitigated, as appropriate. Proposed mitigation measures include solid platform windscreens that would mostly enclose the platform area and help screen internal noise from the outside, and design of the station public address system with speakers at relatively close spacing, permitting lower audio volumes. All mitigation measures for the preferred alternative will be specified in the Final EIS and Record of Decision. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

With regard to the recommendation in one the comments by a Potomac Greens resident for constructing a landscaped earthen berm and retaining wall to reduce station noise impacts (as well as visual impacts) to the Potomac Greens neighborhood: For the proposed berm to be effective, it would need to be more than 50 feet in height to block station mezzanine noise and the view of the station. Such a structure would have a noticeable impact on the community aesthetics at the northern end of the neighborhood and would probably eliminate the existing park.

(1-5-4, 1)

### 5.5.2.13 NPS Land Impacts

**(1-2-15-1-78, 1):** Fixing up Dangerfield Island is laudable, but it's not part of the purpose of the George Washington Memorial Highway, and in no way compensates for the degradation of the parkway that will transpire.

**(1-2-15-1-86, 1):** I think the City does have a moral debt to the parkway and we should fulfill it. There's no need to take parkland for this to deal with the problems the city planning decisions have created.

**(1-1-15-8-222, 1):** The EIS Does Not Include:

- An agreement between the City of Alexandria and Park Services regarding compensation for a using scenic easement and federal parkland to build to option B.

The construction of the George Washington Memorial Parkway included easements to obscure the railroad yard to insure the creation of a beautiful vista as one entered the City of Alexandria. The current arrangement is not included in the EIS, except for a monetary amount devoted to the trail and Dangerfield Island. Fixing up Dangerfield Island is laudable, but is not part of the purpose of the George Washington Memorial Highway and in no way compensates for the degradation of the parkway that will transpire. It also sets a dangerous precedence for diminishing the support and protection of federal parks.

**(1-2-15-1-250, 1):** Option B is clearly visible from the Parkway and will largely extinguish the special interest, especially with the 500-foot very high bridge that almost parallels the Parkway. The National Park Service entered into an agreement under significant political pressure and while fixing up Dangerfield Island is laudable, it is not a part and purpose of the Memorial Parkway and in no way compensates for the degradation of the Parkway that will transpire.

Furthermore, the notion that Option A is as visible and unobtrusive to the Parkway is absurd. The argument that enhanced proximity of Option B will create greater densities topological since the density is allowed only if they get Option B. From the Target store, the difference between Stations A and B is 500 feet. Option B is actually more than half a mile from the center area of the additional density provided by Option B. Suddenly, the quarter mile rule is no longer as weighty

Option B's servicing cost is expected to be 5.1 million more than A [...]

Option B also sets a dangerous precedent for diminishing the support and protection of federal parks, so it doesn't make sense for Alexandria to incur greater risks, pay higher debt servicing costs, and destroy its culture and scenic heritage for less than the distance to the Alexandria Courthouse from here. No.

And I would just add if someone in the West was using federal park land, came in with a suggestion that we want to put railroad tracks on federal park land and we want to build something on a scenic easement and then we'll give you money to run your operating budget -- the person that came up with that idea many years ago was James Watt -- and I think it's a darn shame that the Park service went along with this. Thank you.

**Response:** Any action taken by NPS in conjunction with this project must be consistent with the National Park Service Organic Act, which directs NPS to "conserve the scenery and the natural and historic objects and wild life therein" (16 U.S.C. 1). NPS and the City of Alexandria would need to agree on a package of mitigations that would ensure a net benefit to the George Washington Memorial Parkway under the project.

In addition, the project must comply with Section 106 of the National Historic Preservation Act, which requires federal agencies to consider the effects of their actions on historic properties, and with Section 4(f) of the U.S. Department of Transportation Act, which protects public parks and recreational lands, wildlife refuges, and historic sites. Review of the project under these acts is being conducted in parallel with the NEPA process, as described in Section 3.9, Section 3.10, Appendix D, and Appendix F of the Draft EIS.

The Draft EIS, Section 3.3, Land Acquisitions and Displacements, subsection 3.3.3.2, Build Alternatives, Property Impacts, discusses potential impacts to NPS property and interests in property, including the Greens Scenic Area easement, by the project alternatives and the requirements for approval by NPS and a land exchange process.

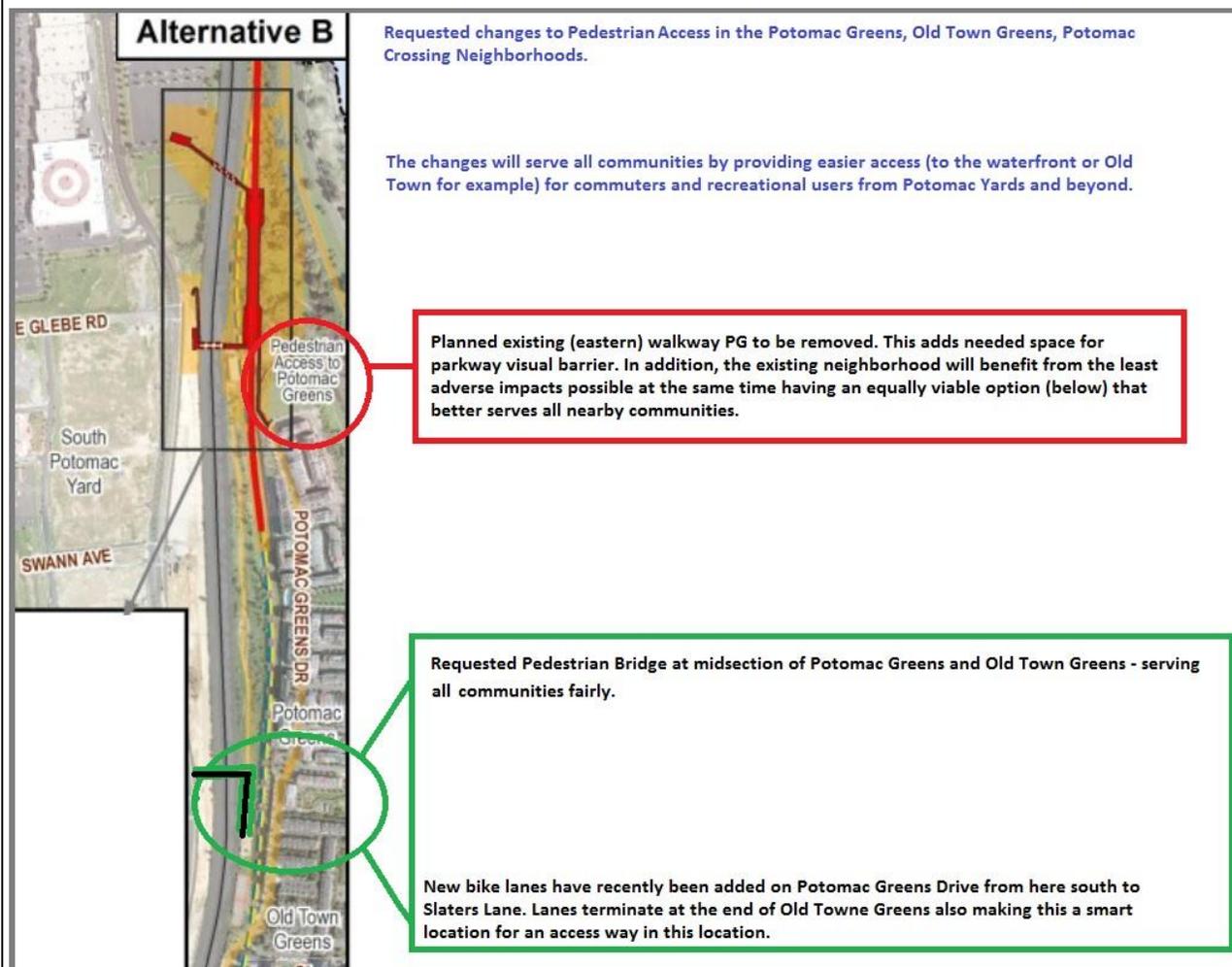
On May 20, 2015 the City of Alexandria City Council voted unanimously in selecting Build Alternative B as the locally preferred alternative. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors including community impacts and benefits as well as impacts to NPS parkland in selecting the preferred alternative. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

The Final EIS will provide additional details on proposed mitigation measures for impacts to the George Washington Memorial Parkway, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsible agencies, such as the Virginia Department of Historic Resources. The Final EIS will be updated to incorporate details of the Net Benefit Agreement between the City of Alexandria and NPS. The Final EIS will also include information on the City's selection of the preferred alternative. (4-2-15, 1)

### 5.5.2.14 Pedestrian Access

**(1-2-0-2-160, 1):** If a “B” option is chosen, please do not build a pedestrian access walkway from the north-end of Potomac Greens Drive directly to the east side of the station in the “Greens Scenic Area”. The Potomac Crossing, Potomac Greens, and Old town Greens (among other) communities would actually benefit from a walkway over the tracks terminating near the traffic circle on Potomac Greens Drive located between Potomac Greens and Old Town Greens neighborhoods, thus enhancing Metro access for all of our neighbors while also reducing through traffic, noise, and the real likelihood of permit parking requirements due to station proximity. The pedestrian access way (if placed near the traffic circle) would also reduce the number of ‘Kiss and Rides’ circling through the neighborhood daily. Furthermore, If a walkway is placed near the circle as opposed to the north-end of Potomac Greens Drive, the new station would encroach less on parkland property – providing more room for a visual barrier helping to enhance the stations appearance from the GW Parkway.

**(1-2-0-2-176, 1):** I have added an attachment to better illustrate the comments regarding pedestrian access below:



**Response:** The proposed station designs included in the Draft EIS, Section 2.3, Build Alternatives, locate the Potomac Greens pedestrian/bicycle bridge close to the station to facilitate the ability of Metrorail passengers to access the station via walking and bicycle.

A separate pedestrian bridge located at the south end of the Potomac Greens neighborhood would significantly lengthen the average walking distance to the station for Potomac Greens residents. As proposed in the Draft EIS, the walking distance for residents of Potomac Greens to access the Potomac Yard station (from the bridge touchdown to faregates) is around 500 feet. If the pedestrian bridge was located at the traffic circle of Potomac Greens Drive and Carpenter Road, the walking distance for residents of Potomac Greens to access the station would be around 2,800 feet (over 1/2 mile). Moving the bridge would also require the construction of a third pedestrian bridge over the Metrorail and CSXT tracks (in addition to the two bridges providing pedestrian access to the Metrorail station from Potomac Yard).

See Section 5.5.2.23 for comments and responses regarding vehicle traffic related to Build Alternative B. (1-2-19, 1)

### 5.5.2.15 Potomac Greens Neighborhood

**(1-2-28-2-15, 1):** While Alternative A would be most accessible to residents of Potomac Greens, B will still provide them access across the tracks to the Potomac Yard area[...]. I presume that on-street parking in Potomac Greens will have to immediately become restricted due to proximity to Metro.

**(1-2-28-2-23, 1):** Section 4 of the City Staff recommendation document acknowledges some of the concerns that the residents of Potomac Greens have expressed regarding a number of issues including traffic resulting from "park and ride" activity and the City Staff pledge to address these concerns.

Because Alternative B includes ingress and egress to the station from Potomac Greens Drive/Carpenter Drive, and because there are no laws regarding the use of these streets for any form of legal transportation, unless the station is designed to discourage access to the Metrorail station from these two streets, when congestion chokes the Route 1 access to Alternative B, Metrorail riders will use this ingress/egress point. The resulting increase in traffic through the Potomac Greens neighborhood will present noise, safety, and health issues for residents.

**(1-2-28-1-77, 1):** I'd like to confine my remarks this evening to the issue of noise relating to traffic that would travel to and from the proposed site through my neighborhood, Potomac Greens, under Alternative B[...]

These problems can be remedied with two simple courses of action. First, remove the Potomac Greens drop-off point and covered walkway from the plan. Replace it with a planned pedestrian and bicycle bridge located at the traffic circle that sits on the boundary between Potomac Greens neighborhood and the Old Town Greens neighborhood. This would facilitate pedestrian and bicycle access to the Metrorail station while removing any need for any rail commuter to ever drive through that neighborhood.

Second, build a visual and audio berm north of Potomac Greens neighborhood and south of the planned Alternative B site. The neighborhood-facing side would be a gently sloping hill, planted with native shrubbery and topped with a tree line. The station-facing side would be a concrete wall, perpendicular to the ground, which would act as an audio reflector to bounce audio waves generated by the station, away from the neighborhood.

This barrier would provide two forms of relief: an effective audio barrier to preserve the current 50 dB audio sound level of the neighborhood and an effective visual barrier so that when residents standing on Potomac Greens look north, they see Virginia hillside and not an alien ship that has landed in a colonial neighborhood. Thank you.

**(1-2-28-1-88, 1):** Some of you may not be aware that the Potomac Greens neighborhood is a horseshoe, there's only one entrance, in and out, at Slater's Lane. So what has concerned me most about this project from the beginning are issues of safety and crime[...]

Now, the new proposed location of the bridge and its connection with the Metro station will give individuals open access, 24 hours a day. Our neighborhood will now have a means for criminals, and other people, to enter and exit our neighborhood from the north, something they do not have right now. In the event of a crime, emergency personnel would have to drive to the northern end of the community, and quite literally run after a perpetrator.

I work at home and when I venture out in the daytime, either by myself or with my two girls, who are three and-a-half and 14 months old, I'm lucky that I get to do it in my community. During the day, there is almost no one around. Those who are out are parents and/or childcare providers and dog walkers. It's a quiet, isolated neighborhood and there is often no one around my children and me as we play outside. If somebody wanted to commit a crime, it would be easy.

With easy access from a Metro stop and a bridge, it's not a stretch to think that crime will become a persistent problem. It would be great to believe that nothing nefarious will occur, but that's not realistic. Historically, where there is a Metro stop, there is an increase in crime. My Association covenants also indicate that the residents of Potomac Greens will be responsible for 50 percent of the maintenance and upkeep of the bridge when it is complete.

**(1-2-28-1-90, 1):** Today, I can look out my kitchen window and see trees and parks and even some close neighbors across the way in the new developments. Alternative A means instead of sipping my morning coffee and looking out my window on an attractive vista, I will see thousands of my closest friends; conversely, they can see me, not something either of us want.

Alternative B is the answer if there is truly a compelling need and believable business case to grow our city. Mitigating constructing impact is extremely important. Beyond the traffic and noise of construction, Potomac Greens Drive is a single access road and any drop-off or Kiss and Ride is ill advised. The notion that the station is good for the neighborhood is certainly suspect, but any access from Potomac Greens should be strictly limited to residents. We believe that we would use a Metro station if it were there, but the impact on the neighborhood is vastly overstated and has very little impact on me.

**(1-2-28-8-98, 1):** However, I think recommendations and concerns voiced by residents of Potomac Greens, as they understand that space best and have made thoughtful suggestions, such as a noise wall, and better located pedestrian walkway.

**Response:** Regarding potential effects of the project on the Potomac Greens neighborhood:

As noted in the comments, some of these additional vehicular trips may use local neighborhood streets to access the station for passenger drop-offs and pick-ups. Although these additional trips are not expected to degrade overall roadway and intersection LOS, they may be noticeable on streets that currently have very low traffic volumes. The introduction and enforcement of parking restrictions, including time limits and residential permitting, would largely avoid and minimize the impacts of Metrorail patrons attempting to park along public streets in adjoining neighborhoods. Additional traffic calming measures may be considered during later project phases.

The Draft EIS, Section 3.24, Construction Impacts, describes potential impacts and identifies broad minimization and mitigation measures for impacts such as those stated in the comments. All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision. Project development during the design phase will further define efforts to minimize construction impacts and, for unavoidable impacts, will define methods to restore resources to their prior condition. During these later design phases, a Transportation Management Plan (TMP) will be developed. The TMP will address construction activities related to the project as well as permanent station operations and will be prepared in coordination with VDOT, the City of Alexandria, and other agencies as applicable.

For construction of the City's preferred alternative, Build Alternative B, significant excavation activities with the potential to affect adjacent building foundations are not likely to occur near residences. Plans for construction excavation activities and measures to prevent settling impacts to adjacent structures will be confirmed during the final design phase of the project when details of the project components and the construction scenarios are finalized.

Regarding security in the vicinity of the station, the Draft EIS, Section 3.21, Safety and Security, describes measures used at Metrorail stations to create a secure environment for patrons. WMATA's Metro Transit Police Department will perform law enforcement and public safety services at the station, and the City of Alexandria Police Department will perform these services in the station vicinity.

The Final EIS will also include a description of future public outreach, including how information will be disseminated to affected parties regarding project effects, and proposed mitigation measures for them.

With regard to the cost to construct the pedestrian bridge to Potomac Yard and agreements regarding maintenance: Neither the cost to construct the individual pedestrian bridge nor the cost of maintenance of the bridge, as stand-alone charges, has been estimated. The City of Alexandria, as the project sponsor, is aware of your concern and has met with the homeowners association to discuss this matter further.

See responses elsewhere in this section to specific topics of concern –comments and responses related to City Parks Impacts (Section 5.5.2.2), Construction Impact (Section 5.5.2.3), Noise (5.5.2.12), Safety and Security (Section 5.5.2.16), and Vehicular Traffic (Section 5.5.2.23).

(1-1-28, 1)

### 5.5.2.16 Safety and Security

**(1-2-5-1-73, 1):** Further, it would bring the potential of dumping a large, non-resident population directly into an otherwise quiet, peaceful, and safe community.

**(1-2-5-1-88, 1):** So what has concerned me most about this project from the beginning are issues of safety and crime [...]

I am worried for the safety of all the children in the neighborhood, and especially the 25. There are more on the west side of Potomac Greens Drive who will be closest to the construction for the next two years -- bless you -- as well as when the Metro station is completed.

Another issue of concern is the pedestrian bridge in its current location, connected to Alternative B. Originally, as required by an agreement between the developers of the neighborhood and the city, the pedestrian bridge was to be located more towards the entrance of Potomac Greens near the traffic circle and was never to be part of the Metro station. It was intended to connect Potomac Greens with Potomac Yards, as has been stated many times.

Now, the new proposed location of the bridge and its connection with the Metro station will give individuals open access, 24 hours a day. Our neighborhood will now have a means for criminals, and other people, to enter and exit our neighborhood from the north, something they do not have right now. In the event of a crime, emergency personnel would have to drive to the northern end of the community, and quite literally run after a perpetrator.

It's a quiet, isolated neighborhood and there is often no one around my children and me as we play outside. If somebody wanted to commit a crime, it would be easy. With easy access from a Metro stop and a bridge, it's not a stretch to think that crime will become a persistent problem. It would be great to believe that nothing nefarious will occur, but that's not realistic. Historically, where there is a Metro stop, there is an increase in crime.

Will it be possible to make the bridge secure by using a keypad or a fob access? What are the plans to keep the neighborhood and the children safe?

**(1-2-5-8-135, 1):** Option "B" will be a "hang out" after businesses close.

**Response:** Regarding safety and security: The Draft EIS, Section 3.21, Safety and Security, describes measures used at Metrorail stations to create a secure environment for patrons. WMATA's Metro Transit Police Department will perform law enforcement and public safety services at the station, and the City of Alexandria Police Department will perform these services in the station vicinity. All comments received on the Draft EIS have been reviewed by WMATA and the City of Alexandria.

The proposed station designs included in the Draft EIS, Section 2.3, Build Alternatives, locate the Potomac Greens pedestrian/bicycle bridge close to the station to facilitate the ability of all Metrorail passengers to access the station via walking and bicycle. See Section 5.5.2.14 for comments and responses regarding pedestrian access for Build Alternative B. (1-2-5, 1)

### 5.5.2.17 Shopping Center

**(1-2-36-1-250, 1):** More acutely, the EIS should have specified the cost that the City will incur by losing the Potomac Yard Shopping Center which is approximately \$14 million in sales revenue every year. These costs raise the annual expense of Option B above 28 million.

Finally, the developer has expressed not only the desire to redo the whole plan but also to pay a lot less than expected if he does get Option B.

**Response:** The Draft EIS, Section 3.4 Land Use and Zoning, states the impacts of the Build Alternatives on surrounding uses, including the shopping center. Neither Build Alternative A nor Build Alternative B would displace the existing shopping center or movie theater. Under Build Alternative B, the northern station entrance would touch down on a portion of the shopping center parking lot that, in the future, is planned for redevelopment and open space as part of a dense mixed-use development incorporating a Metrorail station entrance.

The Draft EIS, Section 2.1, Local Planning Process, summarizes City of Alexandria small area planning for North Potomac Yard, which includes the existing Potomac Yard Shopping Center. The City's adopted North Potomac Yard Small Area Plan envisions the replacement of the retail center with a high-density, transit-oriented neighborhood, including 7.525 million square feet of office, retail, residential, and hotel uses.

See Section 5.5.2.5 for comments and responses regarding financial resources for Build Alternative B. (1-1-36, 1)

### 5.5.2.18 Station Necessity

**(1-2-14-1-84, 1):** And I had thought about Plan B, but after I'm hearing other people speak, I'm beginning to ask is this really needed?

And the expense that is one thing that has a lot to be concerned with and it seems to be what we're really more concerned about, like people, say, from Potomac Greens wanting to Potomac Yards. So why don't we just go to a much cheaper plan and build an over-the-street walkway for people coming from Potomac Greens into Potomac Yard area?

It just would make it easier for a lot of people to walk over these tracks and that would save a lot of money, I think, wouldn't it?

**Response:** The Draft EIS, Section 1.3, describes the project purpose and need, part of which is to provide a direct access point to the regional transit system within Potomac Yard. (1-2-14, 1)

### 5.5.2.19 Support Build Alternative B

**(6-2-23-1-76, 1):** The Coalition for Smarter Growth supports Alternative B as the best alternative from a smart growth transportation, economic development, and environmental perspective.

Alternative B will be located closer to planned mixed-use redevelopment than Alternative A and is less costly and with fewer engineering and third party challenges than the other alternatives. Alternative B is critical to supporting over 7 million square feet of planned transit-oriented development at the old Potomac Rail Yard. That will maximize transit, walking and bicycling trips and reduce regional auto trips.

This will not only help address regional and Alexandria transportation challenges, but will also help reduce air pollution and greenhouse gas emissions. Climate changes are the greatest environmental, human health, economic and national security challenge over the next decades and we need to do everything we can to reduce emissions, including those from transportation.

Alternative B is also critical to supporting economic development in Alexandria and increasing the commercial tax base, reducing pressure on residential property taxes. Studies have shown that compact redevelopment is more efficient, yielding more taxes per unit of development. It also supports market trend Right now, 84 percent of office development in the pipeline is within one-quarter mile of Metro stations in our region. And so far, in 2015, 92 percent of office leases over 20,000 square feet have been within one-half mile of Metro.

You may have read recently that the CEO of Marriott announced the company's intention to move its headquarters from a suburban office park in the next five years. They'll be going to a Metro station. This new Metro station is a wise investment. The NoMa in-fill station in D.C. cost just over \$103 million in 2004 and has sparked 3.8 million square feet of development, 183 million square feet of retail, and over 3,000 residential units and 622 hotel rooms, collectively valued at \$4.7 billion.

Alternative B will do the most for Potomac Yard as a walkable transit-oriented hub and will maximize transportation and environmental benefits.

**(6-2-23-1-89, 1):** We formally endorse the City's professional staff recommended position of locating the new Potomac Yard Metro at Alternative B, as soon as possible. If Alexandria is to make itself competitive in a significant future commercial real estate, opportunities of building the Potomac Yard Metro and selecting Alternative B is the most critical course of action.

**(6-2-23-2-174, 1):** We urge the selection of proposed Alternative B as the Locally Preferred Alternative for construction of the new station. The Sierra Club has long promoted denser, mixed-use, transit oriented development within urban and suburban regions as a means to provide for more walkable, bikeable, and livable communities. Such development, with supporting transit, reduces the need for residents to rely on automobiles as a principle means of transportation. Less reliance on automobiles leads to reductions of vehicle miles traveled and therefore, very importantly, reductions of mobile source emissions of unhealthy pollutants. Because of this work that we strongly support implementation of Alexandria E2s North Potomac Yard Small Area Plan and Alternative B as a means to meet its objectives.

The Plan envisions replacing the massive, auto-centric Potomac Yard Shopping Mall with high density mixed use, transit oriented development. The Metrorail station at Potomac Yard will provide additional Metrorail access for thousands of Alexandria residents, employees, and visitors. Along with the planned high-density development it would result in 10,000- 11,300 daily boardings, 34% of dailytrips in the area taken by transit, walking, or bike and the removal of 5,000 daily auto trips from the road.

Of the five alternatives considered, including the No Build alternative, Build Alternative B does the most to benefit Alexandria, its residents and the regional transportation network. Alternative B does the most to facilitate a compact urban community as envisioned in North Potomac Yard Small Area Plan. Because it will serve the largest number of potential Metrorail riders, Alternative B will remove the most cars from the increasingly congested Route 1 corridor, and do the most to reduce the growth in mobile source air pollution and green house gas emissions.

However Alternative B will also have a greater impact on the natural environment than of any the other three build alternatives, including 1.22 acres and 1.28 acres of Army Corps of Engineers and National Park Service regulated wetlands respectively. It will also have an impact 3.36 Resource Protection Area acres and adverse viewshed impacts from the George Washington Memorial Parkway. We therefore urge the City of Alexandria to work closely with the Army Corp of Engineers and the National Park Service to ensure the strongest possible mitigation measures, which provide the most benefits to the area, be adopted and implemented. We further recommend that these measures be included as conditions in the Record of Decision for the Final Environmental Impact Statement to be issued by the Federal Transit Authority and the National Park Service.

**(4-2-23-6-247, 1):** We urge you to act favorably on the recommendation -- the staff recommendation and adopt Alternative B as the locally preferred alternative for a Metrorail Station at Potomac Yard. And I'm going to take an aside here and tell you I'm going to go home and remove the "s" from comments that are going in on the draft EIS.

Because -- by the way, all the reasons for supporting Alternative B are in the report from your staff and were -- many of them were presented in the excellent presentation you just received, so I won't dwell on that so much as to say simply that Alternative B does the most to promote denser transit-oriented mixed-use development as envisioned in your Small Area Plan, and it will do the most to attract more riders to Metrorail than any of the other build alternatives. And for that reason, it will also do the most to remove cars from the congested Route 1 corridor and help reduce the growth presumably in the emissions of unhealthy criteria air pollutants and the growth in mobile source emissions of greenhouse gases.

We do note, however, that Alternative B does have natural resource impacts and urge that as the process for the final EIS and planning goes forward that those impacts be mitigated with measures that will benefit the community and the area and that those measures be included in the record of decision to be put out by the National Park Service and the Federal Transit Administration at the end of the EIS process.

**(4-2-23-6-248, 1):** Good afternoon, Mr. Mayor, Ms. -- Madam Vice Mayor, Members of City Council. My name is Steve Malone. I'm the Environmental Policy Commission representative on the Potomac Yard Metrorail Station Implementation Workgroup and speaking to you on behalf of the Environmental Policy Commission, which urges your approval of the City staff's recommendation including selection of Alternative B for the location of the future Metrorail Station.

The EPC believes the proposed station provides much needed increased access to public transportation along the rapidly-growing corridor in the City of Alexandria. The new station supports the overall intent of Alexandria's Environmental Action Plan and several key goals within it where the focus on climate change and sustainability of the Environmental Action Plan calls for substantial reductions in admissions from daily vehicle miles traveled and increased access to integrated transit.

The AP sets a target by 2020 of increasing the number of commuters who use public transit by 25 percent over 2000 census data. It also specifically calls for the Potomac Yard Metrorail station to be operational before occupancy rate of Potomac Yard Development reaches 70 percent.

In addition to meeting specific goals of the EAP under Transportation, the new station will also support objectives under air quality improvement, energy conservation and climate change mitigation. Proposed Alternative B, as presented to the EPC, supports the goals of the EAP by maximizing service to residents within a critical walking distance of the Metro Station.

Alternative B will result in a net loss of wetlands. While the EPC is reluctant to reduce any wetlands acreage, the mitigation framework drafted with the National Park Service will result in higher quality wetlands and improved storm water management along a crucial repairing corridor in Alexandria. We understand there will also be opportunities for improvements to Dangerfield Island and how they will use Mount Vernon Trail. Additionally, we note that high density development at public transit sites has much less aggregate impact on wetlands and other natural resources areas than low-density, single- occupancy vehicle-oriented developments in our suburbs.

The EPC looks forward to working with the Council and the staff as the City develops, designs for the new station and begins making detailed planning decisions. To cite one important decision component for which the EPC will advocate is to incorporate bike share stations, bicycle parking facilities, and bicycle and bicycle trail access to create a truly multi-modal transportation hub.

For these reasons, the EPC urges your selection of preferred Alternative B, for no construction access from the George Washington Parkway and continue to work a mitigation plan between the City, WMATA, and the National Park Service. Thank you.

**(2-2-23-5-137, 2):** The Beautification Commission supports the City staff endorsement of Build Alternative B, provided suitable efforts are taken to maintain the existing viewshed from the George Washington Memorial Parkway (GWMP), mitigate impacts on existing wetlands and the scenic easement, minimize alterations to the Potomac Yard Park, and minimize the increase in impermeable surfaces in the station design.

**(1-2-23-2-15, 1):** I like Alternative B the most. While Alternative A would be most accessible to residents of Potomac Greens, B will still provide them access across the tracks to the Potomac Yard area. Additionally, Alternative B will provide more equitable access to the planned development on both the north side (North Potomac Yard) and south side (Landbay G) of South Glebe Road.

**(1-2-23-2-21, 1):** I am writing to support the Potomac Yard Metro Station, with option B being my preference.

**(1-2-23-2-29, 1):** We support the build option for the Potomac Yard Metro Station and believe alternative B should be the City preferred alternative [...]

We are in favor of a metro 'Build E2 option, preferably alternative B.

**(1-2-23-5-31, 1):** I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B.

Alternative B will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impacted wetlands are mitigated and agreements with the National Park Service are worked out well more than pay off. Alternative B will maximize the transportation, economic and environmental benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B as the final site for the station.

**(1-2-23-5-32, 1):** I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B.

Alternative B will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impacted wetlands are mitigated and agreements with the National Park Service are worked out well more than pay off. Alternative B will maximize the transportation, economic and environmental benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B as the final site for the station.

**(1-2-23-2-33, 1):** I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B.

Alternative B will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impacted wetlands are mitigated and agreements with the National Park Service are worked out well more than pay off. Alternative B will maximize the transportation, economic and environmental benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B as the final site for the station.

**(1-2-23-2-34, 1):** I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B.

Alternative B will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impeacted wetlands are mitigated and agreements with the National Park Service are worked out well more than pay off. Alternative B will maximize the transportation, economic and environmnetal benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B as the final site for the station.

**(1-2-23-2-35, 1):** I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B.

Alternative B will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impeacted wetlands are mitigated and agreements with the National Park Service are worked out well more than pay off. Alternative B will maximize the transportation, economic and environmnetal benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B as the final site for the station.

**(1-2-23-2-37, 1):** I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B.

As an Old Town resident concerned about traffic, as well as about climate change and the need to reduce carbon emissions from cars, I believe Alternative B will will definitely do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impeacted wetlands are mitigated and agreements with the National Park Service are worked out well more than pay off. Alternative B will maximize the transportation, economic and environmnetal benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B as the final site for the station.

**(1-2-23-2-38, 1):** I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B.

Alternative B will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impeacted wetlands are mitigated and agreements with the National Park Service are worked out well more than pay off. Alternative B will maximize the transportation, economic and environmnetal benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B as the final site for the station.

**(1-2-23-2-39, 1):** I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B.

Alternative B will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impeacted wetlands are mitigated and agreements with the National Park Service are worked out well more than pay off. Alternative B will maximize the transportation, economic and environmnetal benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B as the final site for the station.

**(1-2-23-2-40, 1):** Support Alternative B (Hearing Number 604/Docket Number R15-01).

Alternative B will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and W.M.A.T.A. staff to ensure that the impeacted wetlands are mitigated and agreements with the National Park Service are worked out well more than pay off. Alternative B will maximize the transportation, economic and environmnetal benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward. Choose Alternative B as the final site for the station.

**(1-2-23-2-41, 1):** I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B.

Alternative B will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impeacted wetlands are mitigated and agreements with the National Park Service are worked out well more than pay off. Alternative B will maximize the transportation, economic and environmnetal benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B as the final site for the station.

**(1-2-23-2-42, 1):** Let's invest in Alexandria and build the Alternative B Potomac Yard metro Station. Great cities have great transit.

I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B.

Alternative B will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impeacted wetlands are mitigated and agreements with the National Park Service are worked out well more than pay off. Alternative B will maximize the transportation, economic and environmnetal benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B as the final site for the station.

**(1-2-23-2-43, 1):** I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B.

Alternative B will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impacted wetlands are mitigated and agreements with the National Park Service are worked out well more than pay off. Alternative B will maximize the transportation, economic and environmental benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B as the final site for the station.

**(1-2-23-2-44, 1):** I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B.

Alternative B will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impacted wetlands are mitigated and agreements with the National Park Service are worked out well more than pay off. Alternative B will maximize the transportation, economic and environmental benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B as the final site for the station.

**(1-2-23-2-45, 1):** I attended the recent public meeting at Charles Houston Rec. Center on Potomac Yard Metro Station and write to express my support for Alternative B. Please include my comments under Hearing Number 604/Docket Number R15-01.

Alternative B will do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. Potomac Yard needs Metrorail to achieve the goal of creating a sustainable and livable neighborhood. If we're going to make the investment to build a Metro Station here, stakeholders must ensure that the station has the greatest possible ridership and that it is well integrated with existing and proposed redevelopment in this neighborhood.

I am confident that the extra effort required by City and WMATA staff to ensure that the impacted wetlands are mitigated and agreements with the National Park Service are worked out well more than pay off. Alternative B will maximize the transportation, economic and environmental benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward under Alternative B.

**(1-2-23-2-46, 1):** I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B.

Alternative B will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impacted wetlands are mitigated and agreements with the National Park Service are worked out well more than pay off. Alternative B will maximize the transportation, economic and environmental benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B as the final site for the station.

**(1-2-23-2-47, 1):** I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B.

Alternative B will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impacted wetlands are mitigated and agreements with the National Park Service are worked out will more than pay off. Alternative B will maximize the transportation, economic and environmental benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B as the final site for the station.

**(1-2-23-2-48, 1):** I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B.

Alternative B will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impacted wetlands are mitigated and agreements with the National Park Service are worked out will more than pay off. Alternative B will maximize the transportation, economic and environmental benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B as the final site for the station.

**(1-2-23-2-57, 1):** I write in support of the construction of the Potomac Yard Metro station, specifically Build Option B, which will move the station further north closest to the densest part of Potomac Yard.

**(1-2-23-2-70, 1):** Option B is my preferred choice as one of the lower cost options which also allows the city further development options.

**(1-2-23-1-73, 1):** I want to state my enthusiastic support for the building of a Metrorail station in the Potomac Yard area and I stand in strong support for Alternative B of the four proposals. That means I oppose Alternatives A, B-CSX and D of the four proposed locations. To reiterate, I support Alternative B of the four proposals and I stand in opposition to the other three proposals.

Hopefully, in line with the reasoning for the construction of a Potomac Yard Metrorail station, my criteria for supporting Alternative B is simply because it provides the greatest and most readily available access to both the commercial and residential areas of Potomac Yard and Potomac Greens [...]

Finally, a modern, efficient Metrorail station in that close proximity to more traditional townhome community would seem out of place and contrary to the aesthetics of the Potomac Greens neighborhood. Conversely, Alternative B represents the best of both worlds in that it dislocates the station farther north along the Metrorail, away from the very close proximity to Potomac Greens. It provides essentially, direct access to the commercial areas of Potomac Yard and allows a residential pedestrian access from Potomac Greens without directly intruding upon a quiet and peaceful neighborhood.

From my perspective, Alternative B clearly meets the intent of a Metrorail station in Potomac Yard by providing direct access to all adjacent commercial and residential areas while moving the bustle and activity of a Metrorail station north and away from the effected residential areas. I also understand that Alternative B is one of the least expensive of the alternatives and would be less problematic to build. I understand that Alternatives B-CSX and D both represent more costly and time-consuming alternatives that should be rejected.

**(1-2-23-1-82, 1):** Site B, though, does work for the economics of the vision for the city.

**(1-2-23-1-90, 1):** Noting that the good of the many outweighs the needs of the few, Alternative B is the only option that we can support[...]Alternative B is the answer if there is truly a compelling need and believable business case to grow our city.

**(1-2-23-1-95, 1):** I personally, as a resident, and I'm here to represent myself, I am in support of Alternative B. I have been in commercial real estate for all of my career and I understand the economic impact, and something like this is very important.

**(1-2-23-8-99, 1):** Support Alt. B

Benefit to adjacent neighborhoods. Build walkability of city. Supports long-term financial health of city.

**(1-2-23-8-100, 1):** I support option B!

**(1-2-23-8-110, 1):** Go B

**(1-2-23-8-113, 1):** Option B is the best choice.

**(1-2-23-8-114, 1):** I'm very much in favor of Alt. B. Please build it ASAP so I can take it every day.

**(1-2-23-8-132, 1):** I favor B site. It provides the best use of Potomac Yard land for additional density. While no plan is perfect, Plan B is the best for long term growth. Park land may be lost but more land is used better.

**(1-2-23-8-133, 1):** Alternative B would be the best option!

**(1-2-23-7-141, 1):** Strongly support Build Alternative B.

**(1-2-23-7-142, 1):** I encourage the City to build a Potomac Yard Metro Station. Alternative B is the best choice but if it is not feasible I would encourage selection of another alternative.

**(1-2-23-7-143, 1):** Proponent for the Metro and highly encourage consideration / selection of Alternative B [...]

**(1-2-23-7-144, 1):** Alternate B - Is the best option.

**(1-2-23-7-145, 1):** I favor Alternative B, which seems to provide the best connectivity to planned redevelopment within Potomac Yard and will give the city and its residents the best bang for their buck.

Impact on viewsheds from the Parkway and acceptable in this case because we're reducing congestion and air pollution along the Parkway.

**(1-2-23-2-160, 1):** I will attempt to provide positive input on the build option B proposal. FWIW, Option A is strongly detrimental to existing communities and should be removed from consideration.

**(1-2-23-2-172, 1):** Though I do not live near Potomac Yard, I am a City resident. I firmly believe that the City of Alexandria as a whole, as well as the entire region, would benefit economically directly as a result of building this station. It would allow more people to live by and work near high-quality transit close. And it would allow more people to be closer to the region's core rather than being out in car-dependent sprawling areas.

I firmly support the City's staff recommendation for Build Alternative B.

**(1-2-23-2-177, 1):** To be clear, I support the B-Build Option for the Potomac Yard Metro Station.

**(1-2-23-1-231, 1):** I'm here this morning to voice my enthusiastic support for the Metro station at Potomac Yard, particularly Location B, the locally preferred alternative [...]

And I consider the Potomac Yard Metro station to be an essential solution to local traffic concerns as well as regional transportation issues. A new in-fill station will alleviate traffic throughout the City and will go a long way in supporting many of the transportation and air quality goals outlined in the Eco-City Charter and Environmental Action Plan. Those particular aspects are near and dear to my heart as a veteran of the Environmental Policy Commission both as a member and chair for many years. To me, it is essential that we pursue transit-oriented development in the City in order to fulfill the robust vision of sustainability laid out in those plans.

I recognize that some of my neighbors are concerned about noise and light pollution, construction traffic, and damage to the neighborhood during construction and operation, and I certainly don't want to minimize those concerns. But as someone who lived in the neighborhood during the construction of the neighborhood, to me those issues do not come anywhere close to outweighing the benefits of the station. Of course, I ask that the City respect the neighborhood and certainly do their best to address those issues during construction and, of course, return the neighborhood and the Park Service and the wetlands back to the condition as soon as construction is complete [...]

Personally, I see countless other benefits to the Potomac Yard Station: increasing home values in the surrounding neighborhoods, more rapid development of the vacant space in the Yard, and increased tax revenue for the City.

Personally, I don't share some of the concerns that have been voiced related to crime, traffic, and parking because I do trust City staff to manage these issues as effectively as they have across the City.

So in closing, I urge Council to approve the staff recommendation of the locally preferred alternative because we have had a number of delays over the years on this effort.

**(4-2-23-1-96, 1):** I'm with the Department of Rail and Public Transportation. We are in support of Alternative B. We will be submitting written comments through the state in favor of Alternative B. We are also opposed to Alternative B-CSX.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria. Many of these stated reasons for selection of Build Alternative B in the comments received are also reflected in the City's Staff Recommendation for Build Alternative B. The City considered a range of factors in its selection, including those resource areas and factors listed in the comments received as well as all other resources and factors evaluated in the Draft EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-2-23, 1)

### 5.5.2.20 Support Build Alternative A or Build Alternative B

**(1-2-22-1-92, 1):** I think either the A or the B alternatives are great.

**(1-2-22-8-97, 1):** I support location/option A because of the southern access and lowest cost and lowest impact to existing infrastructure. Option B would be acceptable in my opinion as well.

**(1-2-22-8-98, 1):** I strongly support alternative A or B and strongly oppose a no-build option, as bus lines do not stimulate the same level of development and simply don't facilitate community to DC as well, which is what most new residents demand.

**(4-1-22-2-212, 1):** 9(g)(i) DRPT Preferences. While the low conceptual cost estimate of all four alternatives in the DEIS falls within the cost in the DRPT FY15-20 SYIP, only Alternatives A and B fall completely within the DEIS high conceptual cost estimate. Additionally Alternative B has fewer vibration impacts and greater economic development benefit than A (and is also the only alternative that generates more development than the No Build). DRPT also notes that Alternative B has a greater amount employment more residents within 0.25 miles of the station than Alternative A (as well as B-CSX and D) and diverts more auto trips than any of the other alternatives. It is also the only alternative consistent with Alexandria's local plans. Thus, DRPT recommends Alternative B although noting that Alternative A would also be acceptable.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria. The City considered a range of factors in its selection, including those resource areas and factors listed in the comments received as well as all other resources and factors evaluated in the Draft EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-1-22, 2)

### 5.5.2.21 Support Build Alternative B or B-CSX Design Option

**(1-2-24-2-66, 1):** As residents of the Potomac Greens neighborhood, we [...] would prefer that the city pursue either the B or B-CSX alternatives, as they will have less direct adverse impacts on the Potomac Greens neighborhood.

**(1-2-24-2-67, 1):** I am writing to provide my support and recommendation for the continued pursuit of Alternative B as the LPA in the citing of the Potomac Yard Metrorail Station. However, I would be in favor, and in fact prefer, Alternative B-CSX if a number of conditions or agreements could be met which would provide assurance that it is a feasible alternative.

1. MOA (or equivalent) between the City, NPS, WMATA and CSX developed which formalizes agreement that a defined plan for realigning the rail tracks is feasible among all parties and can meet a similar build-date as the other alternatives in question.
2. MOA (or equivalent) between the City and all Private Development entities with interest and stake in the financial agreements on which the financing plan for the station is premised that Alternative B-CSX is feasible and that pro-forma impacts can be mitigated through the necessary Master Plan update.
3. Assuming (1) and (2) above have been provided, provide assurance by the City that a Master Plan can be undertaken in such a time frame that a similar build-date is not compromised.

With those points outlined, I will say that I do not believe that any, much less all, of those conditions could ever be met. Based upon the information contained in the DEIS and my knowledge of the project, a choice of Alternative B is the only decision that can be made that does not severely jeopardize the ability of all parties to coalesce around a joint agreement and move forward with the project. Any choice, other than Alternative B, will constitute a virtual stoppage of the project and begin yet another cycle of study, planning, design, and renegotiation. Such a decision is imprudent and will do irreparable harm to the economic future of Potomac Yard.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria. The City considered a range of factors in its selection, including those resource areas and factors listed in the comments received as well as all other resources and factors evaluated in the Draft EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-1-24, 1)

#### 5.5.2.22 Taxes

**(1-2-21-8-136, 1):** Option B is currently expected to cost the City \$13.9 million a year, or \$5.1 million more than option A.

On a more general note, the studies did not incorporate any value for the loss of scenic vistas. Also, and more acutely, the EIS should have specified the cost that the city will incur by losing the Potomac Yard Shopping Center, which is approximately \$14 Million in sales revenue every year. Adding this cost raises the annual costs (not including the operational costs) of option B to over \$28 million per year [...]

Furthermore, the EIS should have specified the cost that the city will incur by losing the Potomac Yard Shopping Center, which is approximately \$14 Million in sales revenue every year. This cost should have been included in the analysis. Doing so raises the annual costs (not including the operational costs) of option B to over \$28 million annually.

**Response:** Regarding financing for the project: The Draft EIS, Chapter 5, discusses project costs and funding. The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria. See Section 5.5.2.5 for comments and responses regarding financial resources for Build Alternative B and Section 5.5.2.17 for comments and responses regarding the shopping center. (1-2-21, 1)

**(1-2-21-1-95, 1):** But, nonetheless, Alternative B, to me, makes the most sense because it straddles both the Potomac Yard, as well as the north section of its development. It will allow us, in terms of city, to gain capacity for development that actually turns into taxpayer money, in terms of the businesses that are going to there with the redevelopment of that shopping center.

I mean I know when I went to the previous forums that were open to the public; I do understand that Target is already committed to anchoring themselves in the redevelopment of North Potomac.

So you already have a prominent -- and I think even this Target, as we call it, is actually the most highly trafficked Target in all of North America. So of course, they're going to want to keep it here. So the development is there and I think Virginia, unlike Maryland, who is hemming and hawing, we're demonstrating the fact that we're going to be progressive and that we're going to look at ways to be different, be more efficient, be environmentally conscientious, and I think that's something that is really to be applauded here.

**Response:** Regarding project costs and City of Alexandria participation in the design-build process: The Draft EIS, Chapter 5, discusses project costs and funding. The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria. (1-2-18, 1)

### 5.5.2.23 Vehicle Traffic

**(1-2-7-1-90, 1):** Alternative B is the answer if there is truly a compelling need and believable business case to grow our city. Mitigating constructing impact is extremely important. Beyond the traffic and noise of construction, Potomac Greens Drive is a single access road and any drop-off or Kiss and Ride is ill advised. The notion that the station is good for the neighborhood is certainly suspect, but any access from Potomac Greens should be strictly limited to residents.

**(1-2-7-2-23, 1):** Because Alternative B includes ingress and egress to the station from Potomac Greens Drive/Carpenter Drive, and because there are no laws regarding the use of these streets for any form of legal transportation, unless the station is designed to discourage access to the Metrorail station from these two streets, when congestion chokes the Route 1 access to Alternative B, Metrorail riders will use this ingress/egress point. The resulting increase in traffic through the Potomac Greens neighborhood will present noise, safety, and health issues for residents [...].

Finally, the very design of the Potomac Greens development invites use for quick drop off and pick up of automotive delivered passengers. A study of the Potomac Greens neighborhood streets shows that the neighborhood is designed around a “loop” of streets. When heading north on Potomac Greens, when a driver encounters the traffic circle, s/he can either go straight or turn right and end up at the Alternative B ingress/egress point. Once a passenger has been dropped off or picked up, the driver can continue in the same direction and exit the neighborhood. There is no need to turn around or even stop once the driver is north of the traffic circle.

This combination of driving convenience, access convenience, and protection from inclement weather all make the proposed Potomac Greens Drive ingress/egress point a very attractive location for commuters to use when entering or exiting the proposed Metrorail station.

So, if as the City Staff writes “the station will be an urban station. All local bus service is planned to be curbside on the west side of the station (from Potomac Avenue),” why should the Potomac Greens and Old Town Greens neighborhoods be concerned that traffic will increase in the neighborhood because of Alternative B?

There are two reasons for concern:

1. The Potomac Greens ingress/egress walkway on Potomac Greens Drive invites use by commuters: it is easy to access, easy to leave, and provides protection from weather
2. As development in Potomac Yards proper continues to increase, road congestion on Route 1 will increase. This increased road congestion leads to a natural phenomenon among drivers: find a less congested path to the destination. And for anyone using the proposed Metrorail station who lives east of Route 1, using the Potomac Greens Drive drop off/pick up point is the path of least traffic [...]

Using this alternative route enables commuters from north Old Town to avoid having to cross the already congested Monroe Ave Bridge in order to reach the Potomac Yards station. And even commuters who live in neighborhoods south of Old Town off George Washington Parkway, this path is much faster than using Route 1 for north---south transit during rush hours.

**(1-2-7-1-77, 1):** I'd like to confine my remarks this evening to the issue of noise relating to traffic that would travel to and from the proposed site through my neighborhood, Potomac Greens, under Alternative B [...]

These problems can be remedied with two simple courses of action. First, remove the Potomac Greens drop-off point and covered walkway from the plan. Replace it with a planned pedestrian and bicycle bridge located at the traffic circle that sits on the boundary between Potomac Greens neighborhood and the Old Town Greens neighborhood. This would facilitate pedestrian and bicycle access to the Metrorail station while removing any need for any rail commuter to ever drive through that neighborhood.

**Response:** The Draft EIS, Section 3.2.3, discusses the potential impacts of a new Metrorail station at Potomac Yard on area traffic conditions. The station is projected to generate low levels of vehicular trips similar to other urban stations; however, these additional trips resulting from the project Build Alternatives would have no effect on overall intersection Level of Service (LOS) in the study area compared to the No Build condition. Near the Potomac Greens neighborhood, the analysis included the Portner/Potomac Greens Drive and Slaters Lane intersection (the ingress/egress intersection to Potomac Greens). AM peak hour LOS is projected to be LOS A for the No Build and Build conditions in both 2016 and 2040. PM peak hour LOS is projected to be LOS A for both the No Build and Build conditions 2016 and LOS B for both the No Build and Build conditions in 2040.

As noted in your comment, some of these additional vehicular trips may use local neighborhood streets to access the station for passenger drop-offs and pick-ups. Although these additional trips are not expected to degrade overall roadway and intersection LOS, they may be noticeable on streets that currently have very low traffic volumes. The introduction and enforcement of parking restrictions, including time limits and residential permitting, would largely avoid and minimize the impacts of Metrorail patrons attempting to park along public streets in adjoining neighborhoods. Additional traffic calming measures may be considered during later project phases. The City of Alexandria is responsible for planning traffic improvements, parking, and pedestrian accommodations at specific locations in the neighborhoods surrounding the proposed station location. All comments received on the Draft EIS have been reviewed by the City of Alexandria.

The proposed station designs included in the Draft EIS, Section 2.3, Build Alternatives, locate the Potomac Greens pedestrian/bicycle bridge close to the station to facilitate the ability of Metrorail passengers to access the station via walking and bicycle. A separate pedestrian bridge located at the south end of the Potomac Greens neighborhood would significantly lengthen the average walking distance to the station for Potomac Greens residents. As proposed in the Draft EIS, the walking distance for residents of Potomac Greens to access the Potomac Yard station (from the bridge touchdown to faregates) is around 500 feet. If the pedestrian bridge was located at the traffic circle of Potomac Greens Drive and Carpenter Road, the walking distance for residents of Potomac Greens to access the station would be around 2,800 feet (over 1/2 mile). Moving the bridge would also require the construction of a third pedestrian bridge over the Metrorail and CSXT tracks (in addition to the two bridges providing pedestrian access to the Metrorail station from Potomac Yard). (1-2-7, 2)

**(1-2-7-2-29, 1):** We support the build option for the Potomac Yard Metro Station and believe alternative B should be the City preferred alternative. However, we are also concerned about the increased traffic the Metro Station will bring to East Glebe Road and would request that the city implement a series of traffic calming and flow improvement on East Glebe.

The draft EIS predicts that E. Glebe Rd will carry 34% of the vehicular traffic going to the new metro rail station, which is almost twice the metro traffic of any other road [Ref 1]. The EIS traffic study suggests this will change the East-bound traffic rating of the E. Glebe – Rt 1 intersection in the first year of operation from a 'D' in the 'No-Build' Alternative to an 'F' in the 'Build' alternative. The study states, "...the eastbound approach experienced a substantial LOS downgrade..." Specifically, the average delay per vehicle is supposed to more than double from 52 seconds/vehicle to 136 seconds/vehicle in the first year the station is built [Ref 2]. Traffic is then expected to further increase each year the metro is in service. The study shows that the metro will cause traffic to increase more on E. Glebe Rd than on any other road, and that the E. Glebe – Rt 1 intersection is the only intersection predicted to have an overall rating of 'E' in 2040 (E is defined as unstable flow / Intolerable delay) [Ref 3]. In addition, a more recent traffic study completed as part of the Oakville Triangle planning process projects even worse traffic impacts for East Glebe Road in the near and long term.

Our primary concerns with the increased traffic are: being able to safely cross E. Glebe Rd, being able to safely get into our cars parked on the street, being able to safely pull out onto E. Glebe from our alley and the flow of traffic at the intersection of East Glebe and Rt 1. We support the metro station, but would encourage the city to include a set of clear traffic calming and flow improvements on East Glebe to maintain current speeds on East Glebe, and to improve the safety getting into and out of parked cars. Potential options may include addition of a curb-cut to better define the parking lane, addition of a speed sensitive traffic light, speed bumps similar to those on Commonwealth Avenue, adding a stop sign on the corner of Montrose and E. Glebe, widening the intersection at East Glebe and Rt 1 etc.

We are in favor of a metro 'Build E2 option, preferably alternative B. However, we also request the city include funds to mitigate the increase in traffic that is expected on East Glebe Rd, and which is predicted to be the single road most affected by the metro.

**(1-2-7-2-177, 1):** I am writing to request that the city include funds to manage the increase in traffic that is expected on E. Glebe Rd as a result of the Potomac Yard Metro Station plan and as outlined in the draft EIS. Potential options may include better definition of the parking lane, the addition of a bike lane, traffic speed humps, a speed sensitive traffic light, other options, or a combination of the above. To be clear, I support the B-Build Option for the Potomac Yard Metro Station.

**Response:** Regarding vehicle traffic along East Glebe Road: As discussed in Section 3.2.3 of the Draft EIS, a new Metrorail station at Potomac Yard would not have an adverse effect on overall traffic conditions in the study area.

However, as referenced in the comments, the eastbound approach of the East Glebe Road and U.S. Route 1 intersection would be expected to have a decrease in its level of service (LOS) as a result of the project, although the overall intersection LOS would not change. The City of Alexandria is responsible for planning traffic improvements and pedestrian accommodations at specific locations in the neighborhoods surrounding the proposed station location. All comments received on the Draft EIS have been reviewed by the City of Alexandria. As part of its ongoing citywide traffic management and pedestrian programs, the City of Alexandria will monitor conditions along streets in the station vicinity during later project design phases and after the project opening. Through these periodic reviews, the City will determine if measures, such as traffic calming, are needed to address any issues associated with vehicular trips to the station.

The Draft EIS, Section 3.2.3.2, notes that the introduction and enforcement of parking restrictions, including time limits and residential permitting, would largely avoid and minimize the impacts of Metrorail patrons attempting to park along public streets in adjoining neighborhoods. (1-2-7, 2)

#### 5.5.2.24 Wetlands / Waters of the U.S.

**(1-2-13-1-78, 1):** Second, the mitigation needed for cleaning up the wetlands: Potomac Yard was one of the most active railroad yards in the United States, with significantly polluted soil, and the water from the yard runs off into the wetlands. There is no discussion about it, or the ramifications in the EIS.

**(1-2-13-2-223, 1):** •The mitigation needed for cleaning up the wetlands.

Potomac Yard was at one time the most active railroad yards in the United States, with significantly polluted soil, and the water from the yard runs off into the wetlands. There is no discussion about it, or the ramifications in the EIS.

**Response:** Regarding contamination in the wetlands area: The Draft EIS, Section 3.20, Hazardous and Contaminated Materials, and Section 3.24, Construction Impacts, subsection on Hazardous and Contaminated Materials (pages 3-226 and 3-227), discuss contamination on the site of the former rail yard (including the area within the Greens Scenic Area easement where the wetlands are located), potential effects of the Build Alternatives, and measures to avoid, minimize and mitigate adverse effects during project construction. (1-2-13, 1)

**(2-2-13-5-137, 1):** The Commission is encouraged by the framework net benefit agreement reached with the National Park Service regarding the Greens Scenic Area easement for mitigating impacts and the loss of parkland within the GWMP. In addition to the terms outlined in Table 2 and Appendix B of the staff recommendation, the Commission requests careful consideration of mitigation efforts to minimize the permanent and temporary impacts to the wetlands. The Commission recommends that the land remaining in this important ecological area after construction of the Metrorail Station be improved by removing non-native trees and vegetation.

**Response:** Regarding wetland impacts: The Draft EIS, Section 3.14, Waters of the United States (Wetlands), describes potential impacts and identifies minimization and mitigation measures. NPS may also approve the use of regulated wetlands and floodplains on NPS land in accordance with Director's Orders 77-1 and 77-2, which establish the policies, requirements, and standards through which the NPS will meet its responsibilities to protect and preserve wetlands and floodplains. A Wetland and Floodplain Statement of Findings is currently being prepared by NPS in accordance with the Director's Orders, which will include measures to mitigate impacts to wetlands and floodplains. The Statement of Findings will be published with the Final EIS, and all mitigation measures for the Preferred Alternative will be specified in the Record of Decision. In addition, a Joint Permit Application would be developed for both permanent and temporary project-related wetland impacts in compliance with Section 404 of the Clean Water Act; the permitting process would be initiated with the U.S. Army Corps of Engineers (USACE), Virginia Department of Environmental Quality (VDEQ), and NPS. If wetlands are deemed tidal wetlands, the permitting process would also be initiated with the Virginia Marine Resources Commission (VMRC). Further details of the mitigation measures will be developed in accordance with NPS and USACE during the final design phase of the project when details of the project components and the construction scenarios are finalized.

The Final EIS will clarify that the project will comply with Executive Order 13112. As described in the Draft EIS, Section 3.18.4, the development and implementation of an Invasive Species Management Plan, which addresses the removal and management of invasive species, is proposed. The Plan will address restoration of vegetation cleared during construction and installation of permanent plantings used in landscaping and screening the station site, including, for example, ensuring that restoration plantings and seed mixes consist of native stock and are free and clear of invasive or noxious weeds. Further details regarding the Invasive Species Management Plan will be developed in compliance with EO 13112 and presented in the Final EIS or Record of Decision. (6-2-13, 1)

**(1-2-13-1-82, 1):** And while I appreciate that it impinges into the parkland, and there are historic reasons not to do that, but I would say that if you build at Site B, then it is incumbent upon you to fully restore the wetlands and the land around it. And that's going to cost money, so plan on it.

So I think that if you're going to make a commitment to Option B, Mayor Euille and the City Council, then you also need to really stand up and commit that you're going to spend the money to restore the lands, to build the appropriate historical building effectively so that when it's all done, it looks right.

**(1-2-13-1-83, 1):** And my final question is continuing to use NEPA as the basis for EIS, Alternative B, chosen by the City of Alexandria staff, would permanently fill in 1.22 acres of wetlands regulated by the Army Corps of Engineers under the Clean Water Act. The B-CSX option would impact this area far less in one-tenth of an acre. Why is B-CSX not the correct location for the new station based on this data point?

**Response:** Regarding wetland impacts: The Draft EIS, Section 3.14, Waters of the United States (Wetlands), describes potential impacts and identifies minimization and mitigation measures. NPS may also approve the use of regulated wetlands and floodplains on NPS land in accordance with Director's Orders 77-1 and 77-2, which establish the policies, requirements, and standards through which the NPS will meet its responsibilities to protect and preserve wetlands and floodplains. A Wetland and Floodplain Statement of Findings is currently being prepared by NPS in accordance with the Director's Orders, which will include measures to mitigate impacts to wetlands and floodplains. The Statement of Findings will be published with the Final EIS, and all mitigation measures for the Preferred Alternative will be specified in the Record of Decision. In addition, a Joint Permit Application would be developed for both permanent and temporary project-related wetland impacts in compliance with Section 404 of the Clean Water Act; the permitting process would be initiated with the U.S. Army Corps of Engineers (USACE), Virginia Department of Environmental Quality (VDEQ), and NPS. If wetlands are deemed tidal wetlands, the permitting process would also be initiated with the Virginia Marine Resources Commission (VMRC). Further details of the mitigation measures will be developed in accordance with NPS and USACE during the final design phase of the project when details of the project components and the construction scenarios are finalized. (1-5-13, 1)

**(6-2-13-1-76, 1):** We recognize that Alternative B will have an impact on National Park Service land, a related easement, and a limited amount of wetlands; however, we support the mitigation measures being proposed and believe that the mitigation, together with the environmental benefits of Alternative B support the selection of this alternative.

**(6-2-13-2-174, 1):** However Alternative B will also have a greater impact on the natural environment than of any the other three build alternatives, including 1.22 acres and 1.28 acres of Army Corps of Engineers and National Park Service regulated wetlands respectively. It will also have an impact 3.36 Resource Protection Area acres and adverse viewshed impacts from the George Washington Memorial Parkway. We therefore urge the City of Alexandria to work closely with the Army Corp of Engineers and the National Park Service to ensure the strongest possible mitigation measures, which provide the most benefits to the area, be adopted and implemented. We further recommend that these measures be included as conditions in the Record of Decision for the Final Environmental Impact Statement to be issued by the Federal Transit Authority and the National Park Service.

**Response:** Regarding wetland impacts: The Draft EIS, Section 3.14, Waters of the United States (Wetlands), describes potential impacts and identifies minimization and mitigation measures. NPS may also approve the use of regulated wetlands and floodplains on NPS land in accordance with Director's Orders 77-1 and 77-2, which establish the policies, requirements, and standards through which the NPS will meet its responsibilities to protect and preserve wetlands and floodplains. A Wetland and Floodplain Statement of Findings is currently being prepared by NPS in accordance with the Director's Orders, which will include measures to mitigate impacts to wetlands and floodplains. The Statement of Findings will be published with the Final EIS, and all mitigation measures for the Preferred Alternative will be specified in the Record of Decision. In addition, a Joint Permit Application would be developed for both permanent and temporary project-related wetland impacts in compliance with Section 404 of the Clean Water Act; the permitting process would be initiated with the U.S. Army Corps of Engineers (USACE), Virginia Department of Environmental Quality (VDEQ), and NPS. If wetlands are deemed tidal wetlands, the permitting process would also be initiated with the Virginia Marine Resources Commission (VMRC). Further details of the mitigation measures will be developed in accordance with NPS and USACE during the final design phase of the project when details of the project components and the construction scenarios are finalized. (6-2-13, 1)

#### 5.5.2.25 Utilities

**(3-2-59-2-161, 47):** Page 3-198 states that Build Alternatives B and D could potentially be impacted by the planned new Dominion Power electrical line. Additional evaluation should be included in the EIS as to what would happen if this did occur.

**Response:** The Final EIS, Section 3.22, Utilities, will include additional analysis on the Preferred Alternative's potential impacts to the planned new Dominion Power electrical line. (3-2-59, 1)

### 5.5.3 B-CSX Design Option

#### 5.5.3.1 Amtrak, VRE, and CSX Impacts

**(5-3-2-167, 1):** CSXT has reviewed the Potomac Yard Metrorail Station Draft Environmental Impact Statement for the new in-fill station at Potomac Yard. CSXT understands the importance of this project to the neighborhood development, to the City, WMATA, and the greater DC area.

CSXT would like to offer a response to the Build Alternative B-CSX Option, involving the relocation of the CSXT tracks and right of way (ROW) to the west of their existing alignment, to allow the City and WMATA to utilize the existing CSXT ROW to build the proposed station without affecting the National Park Service which borders WMATA to the east.

Please understand that although there may be a few minor improvements to CSXT property and assets as a part of the outcome of this project, CSXT strongly prefers that Build Alternative B-CSX Design Option not be chosen. The disruption to Amtrak and VRE passenger operations, and CSXT freight operations for the duration of construction would be significant and expensive, far outweighing any potential benefit.

If Build Alternative B-CSX Design Option is chosen as a possible alternative for the new Potomac Yard Metro Station, CSXT has numerous conditions that must be met. Some of these conditions include the following:

CSXT shall be reimbursed for all costs associated with this project, including:

- Preliminary engineering plan reviews
- All necessary track and signal work
- Construction engineering and inspection
- Full time flagman for duration of construction
- Amtrak/VRE passenger delays/penalties
- CSXT acquires new ROW via Fee Simple
- At a minimum, maintain existing ROW width on new section and existing fencing requirements.
- All pedestrian crossings must be grade separated and span the entire new CSXT ROW
- CSXT must keep the ability to maintain access to its ROW and access roads.

Please be advised that the above items are not all inclusive, but list of initial concerns. As the project progresses there will likely be additional issues that will need to be addressed as part of the normal project review progression.

CSXT looks forward to hearing what options is ultimately chosen and will continue to work with all affected agencies on completing this important project.

**Response:** Regarding the potential effects of B-CSX Design Option on VRE, Amtrak, and CSXT rail service: As a result of the City of Alexandria's adoption of Build Alternative B as the preferred alternative for the project on May 20, 2015, B-CSX Design Option will not be advanced further. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

Construction activities for the preferred alternative will be scheduled and coordinated with CSXT, Amtrak, and Virginia Railway Express to avoid or minimize impacts to operations of freight, commuter, and passenger rail services along the CSXT line. (4-2-50, 1)

#### **(4-3-50-2-189, 1): ENVIRONMENTAL IMPACTS AND MITIGATION**

9. Rail and Transit Considerations.

9(g)(ii) DRPT Alternatives Criticism.

DRPT is strongly opposed to Alternative B-CSX and Alternative D, and believes neither one is financially feasible; DRPT recommends setting both of these alternatives aside. Both have significantly more land acquisition and would require a significant realignment of the Metrorail Yellow and Blue Line tracks that could likely delay the current 2021 projected completion. These two alternatives would also have significant negative impact on VRE's operation during construction.

While temporary construction impacts are evaluated, the DEIS does not assess the impact on VRE. While the Technical Memorandum in Appendix 18 addresses CSX operation, it does not adequately assess the construction impacts on freight or passenger rail operation. For example if slow orders or stoppages are issued for passenger trains, on-time performance for VRE would be negatively impacted and ridership would likely decrease. Would all three existing tracks remain in operation outside of temporary stoppages during construction? What degree of temporary stoppages would be issued during construction? If Alternative B-CSX or D is chosen, the construction impacts on VRE and freight rail should be fully evaluated during preparation of the Final EIS, and every attempt to mitigate adverse impacts should be included in the Record of Decision.

**Response:** As a result of the City of Alexandria's adoption of Build Alternative B as the preferred alternative for the project on May 20, 2015, neither B-CSX Design Option nor Build Alternative D will be advanced further. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

Construction activities for the preferred alternative will be scheduled and coordinated with CSXT, Amtrak, and Virginia Railway Express to avoid or minimize impacts to operations of freight, commuter, and passenger rail services along the CSXT line. (4-3-50, 1)

**(4-3-50-2-189, 2):** 9(h)(ii) Amtrak/Virginia Rail Express. The Potomac Yard EIS Alternative B-CSX is the only one that straightens out the CSX track geometry significantly such that it may allow for a greater speed compared to that shown on DRPT's proposed alignment alternatives. Because of the long tangent shown on the Potomac Yard Draft EIS Alternative B-CSX Alternative, there is a potential to add a new Amtrak/VRE station stop at this location if desired. Currently, however, there are no plans for a Potomac Yard Amtrak or VRE station, and DRPT's earlier comments in this memo opposing Alternative B-CSX still stand (see item 9(g)(ii), above). Since the area will have a direct connection from the King Street Metrorail station, which allows a transfer from Amtrak, and the Crystal City and L'Enfant Plaza Metrorail stations, which have transfers from VRE, DRPT does not foresee a need for a future Amtrak or VRE station at Potomac Yard.

**Response:** Comment Noted. (4-3-50, 2)

### 5.5.3.2 Financial Resources

**(1-3-9-2-15, 1):** I fear that Alternative B-CSX would run into delays and cost overruns associated with the extra engineering work.

**Response:** Regarding the schedule impacts and costs of B-CSX Design Option: Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-3-9, 1)

### 5.5.3.3 Support B-CSX Design Option

**(1-3-24-2-25, 1):** We believe that option B-CSX is the clear best option for residents since it serves the greatest community and commercial interests, and it minimizes the environmental/scenic impacts on the Parkway.

**(1-3-24-2-49, 1):** I'm writing to in regard to Potomac Yard Metro station (Hearing Number 604/Docket Number R15-01), to express my support for Alternative B-CSX Design Option.

Alternative B-CSX Design will by far do the most for fostering Potomac Yard as a walkable, transit-oriented hub for Alexandria. I am confident that the extra effort required by City and WMATA staff to ensure that the impacted wetlands are mitigated and agreements with the National Park Service are worked out will more than pay off. Alternative B-CSX will maximize the transportation, economic and environmental benefits of the public and private investment in the Metro station.

I look forward to the Potomac Yard Metro station moving forward, and encourage officials to choose Alternative B-CSX Design Option as the final site for the station.

**(1-3-24-2-63, 1):** Please accept this letter as strong support for the metrorail station at Potomac Yards with a preference for Option B-CSX.

The purpose of the Metrorail station along the existing metro line includes taking advantage of existing transit infrastructure to maximize transit use and minimize disruption to the existing communities at a reasonable cost. Additionally, the Metrorail station can add value to existing land, provide incentive to locate commercial and residential uses around existing transit and road infrastructure and appeal to a current economic and lifestyle consideration for both residents and tenants as they consider their location analysis. Maximizing the value added to land helps justify the expense and accelerate the pay back period for the investment while providing an economic development incentive to the market to locate on properties both zoned for expansion and where expansion is appropriate, where we have investments in roads and buses, where we have attracted substantial private residential and commercial investment. While the B-CSX location may reduce land available for other economic uses, this location can help increase the value of adjacent properties currently undeveloped or otherwise underutilized where plans exist to increase both the density and intensity of the existing uses. While the Option B can leave property on the West available for construction, this site at the terminus of Potomac Greens provides little opportunity for direct value added to the adjacent existing residential properties, impacts the buffer corridor provided by the GW Parkway and has the greatest impact on the existing residential community during construction and during use. Though it is impossible to know for certain, it is possible that the "B" station location can negatively impact property values on the East side due to a perception of increased foot and auto traffic, lighting, noise and general activity.

This Metrorail station, no matter the ultimate location, can meet the market demands for transit oriented communities, raise property values, encourage job growth, minimize the incremental traffic impact resulting from natural population growth and support efforts to reduce per capita travel and carbon emissions.

**(1-3-24-2-66, 1):** As residents of the Potomac Greens neighborhood, we have particular concerns about Build Alternatives A and D, and would prefer that the city pursue either the B or B-CSX alternatives, as they will have less direct adverse impacts on the Potomac Greens neighborhood.

**(1-3-24-2-67, 1):** I am writing to provide my support and recommendation for the continued pursuit of Alternative B as the LPA in the siting of the Potomac Yard Metrorail Station. However, I would be in favor, and in fact prefer, Alternative B-CSX if a number of conditions or agreements could be met which would provide assurance that it is a feasible alternative.

**(1-3-24-1-80, 1):** The purpose of the National Environmental Policy Act, NEPA, in other words, is to ensure that environmental factors are weighed equally when compared to other factors in the decision-making process undertaken by federal agencies. If this were the case, then why would city staff select Option B, based on the best economic benefit for the City of Alexandria, according to the Staff Report, then it would appear Option B-CSX is the best choice for the environment.

**(1-3-24-8-108, 1):** B-CSX! Or D! Please

**(1-3-24-8-129, 1):** As a homeowner who lives on Potomac Greens Drive in the Potomac Greens community, the only metro alternative that I support is B-CSX due to the serious and undesired negative impacts of Alternative A and B on my neighborhood and the value of my home.

**(1-3-24-7-147, 1):** I prefer B-CSX:

- Build it right, build it once
- Most passengers/revenue
- Close to businesses
- Not ruinously expensive (D)

**(1-3-24-2-160, 1):** Option B CSX is the preferred build site due to close proximity of business/shopping/residential. Additionally, the reduced impact on parkland and adjacent neighborhoods is a big factor. B-CSX would also make the site equidistant from neighboring Metrorail stops. There is obviously less developable space for the city of Alexandria as opposed to other sites and there is opposition from MARC and CSX due to temporary track realignment but ultimately would be a win for all involved – reducing noise as well as environmental/visual impacts to the parkway and nearby communities. This “growing-pain” would eventually also help CSX and MARC by straightening the track in this section of rail right of way.

**(4-3-24-2-210, 1):** Of the four build options, DOF notes that B-CSX design option has the least adverse impact on forest resources. It would be built on an already developed site, would require no tree removal and appears to have minimal impact on the nearby NPS land and viewshed.

Given that the area surrounding the footprint for the four design options is already highly urbanized, the importance of avoiding existing green corridors is heightened and the B-CSX design option does the best job at doing that among the four options.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. The City of Alexandria’s factors for the selection of the preferred alternative are detailed in the City’s *Staff Recommendation for the Preferred Alternative*, which is available on the City’s website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria. The City considered a range of factors in its selection, including those resource areas and factors listed in the comments received as well as all other resources and factors evaluated in the Draft EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA’s decision and present its basis for the decision regarding the NEPA preferred alternative. (1-3-24, 1)

**(1-3-24-7-151, 1):** 2) B-CSX is preferable my minimizing the loss of GW parkway lands / wetlands. Otherwise "No Build" is the second choice.

**(1-3-24-1-245, 1):** VRE, for example, objected to BCSX which is a wise compromise if you must have a Metro Station because it gives to the people who are wary of this development less of it, because staff thinks that you'll get some developer contribution and we know the developers don't want to contribute much, and we can look around and see that with teleworking and all these other things that are happening, the demand for office space might not be as great.

So by having the BCSX compromise, you can hedge the danger that you get a huge development of the Metro Station that you can't pay for in the long run, that the developers run in and say "give us residential instead of commercial" and you're not going to tell them no. We know that. So what this does is it reduces the size of the development. It reduces the disruption. You don't need park land for BCSX and if, as in Arlington, there is a political revolt against the development, this kind of compromise is more likely to be a more enduring one than your preferred B option that you seem set upon.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria. The City considered a range of factors in its selection, including those resource areas and factors listed in the comments received as well as all other resources and factors evaluated in the Draft EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-3-24, 2)

#### 5.5.3.4 Wetlands / Waters of the U.S.

**(1-3-13-1-83, 1):** And my final question is continuing to use NEPA as the basis for EIS, Alternative B, chosen by the City of Alexandria staff, would permanently fill in 1.22 acres of wetlands regulated by the Army Corps of Engineers under the Clean Water Act. The B-CSX option would impact this area far less in one-tenth of an acre. Why is B-CSX not the correct location for the new station based on this data point?

**Response:** Regarding relative wetland impacts of the alternatives: The Draft EIS, Section 3.14, Waters of the United States (Wetlands), describes potential impacts and identifies minimization and mitigation measures. NPS may also approve the use of regulated wetlands and floodplains on NPS land in accordance with Director's Orders 77-1 and 77-2, which establish the policies, requirements, and standards through which the NPS will meet its responsibilities to protect and preserve wetlands and floodplains. A Wetland and Floodplain Statement of Findings is currently being prepared by NPS in accordance with the Director's Orders, which will include measures to mitigate impacts to wetlands and floodplains. The Statement of Findings will be published with the Final EIS, and all mitigation measures for the Preferred Alternative will be specified in the Record of Decision. Further details of the mitigation measures will be developed in accordance with NPS and USACE during the final design phase of the project when details of the project components and the construction scenarios are finalized.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors in addition to impacts to wetlands and other Waters of the U.S. in selecting the preferred alternative. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-5-13, 1)

#### 5.5.4 Build Alternative D

##### 5.5.4.1 Amtrak, VRE and CSX Impacts

**(4-3-50-2-189, 1):** Rail and Transit Considerations. The Draft EIS discusses impacts and mitigation on transportation, 9(g)(ii) DRPT Alternatives Criticism. DRPT is strongly opposed to Alternative B-CSX and Alternative D, and believes neither one is financially feasible; DRPT recommends setting both of these alternatives aside. Both have significantly more land acquisition and would require a significant realignment of the Metrorail Yellow and Blue Line tracks that could likely delay the current 2021 projected completion. These two alternatives would also have significant negative impact on VRE's operation during construction.

While temporary construction impacts are evaluated, the DEIS does not assess the impact on VRE. While the Technical Memorandum in Appendix 18 addresses CSX operation, it does not adequately assess the construction impacts on freight or passenger rail operation. For example if slow orders or stoppages are issued for passenger trains, on-time performance for VRE would be negatively impacted and ridership would likely decrease. Would all three existing tracks remain in operation outside of temporary stoppages during construction? What degree of temporary stoppages would be issued during construction? If Alternative B-CSX or D is chosen, the construction impacts on VRE and freight rail should be fully evaluated during preparation of the Final EIS, and every attempt to mitigate adverse impacts should be included in the Record of Decision.

9(g)(iii) Engineering Evaluation. The project engineering team from HOR reviewed the alternatives and noted that the vertical clearance over CSX is not correct. It is shown as 23', but should be 24'-3" for new structures over CSX. The design criteria account for a "future" CSXT track (40' total - 15' from centerline of track to future and 25' to pier/crash wall).

**Response:** Regarding potential effects on VRE, Amtrak, and CSXT rail service by B-CSX Design Option and Alternative D: As a result of the City of Alexandria's adoption of Build Alternative B as the preferred alternative for the project on May 20, 2015, neither B-CSX Design Option nor Build Alternative D will be advanced further. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

Construction activities for the preferred alternative will be scheduled and coordinated with CSXT, Amtrak, and Virginia Railway Express to avoid or minimize impacts to operations of freight, commuter, and passenger rail services along the CSXT line. (4-4-50, 1)

#### 5.5.4.2 Financial Resources

**(1-4-22-8-97, 1):** Option D should be eliminated due to extravagant cost.

**(1-4-9-2-15, 1):** Alternative D does not seem to provide much of an extra benefit despite the significantly higher overall cost.

**Response:** Regarding costs of Build Alternative D: Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. The City of Alexandria's financial feasibility analysis for Build Alternative D and factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors including cost in selecting the preferred alternative. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-1-22, 2)

### 5.5.4.3 Other

**(2-4-27-2-138, 1):** General: Alternative D (not recommended by staff) would have particular environmental effects on Arlington County, related to construction, noise and vibration, visual effects, and storm water effects.

**Response:** Regarding the potential environmental effects of Build Alternative D: Following the public comment period, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria. The City considered a range of factors in its selection, including those resource areas and factors listed in the comments received as well as all other resources and factors evaluated in the Draft EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (2-4-27, 1)

### 5.5.4.4 Pedestrian Access

**(1-4-25-1-94, 1):** But I was looking forward to a new Metro station. And in fact, I was hoping for Alternative D, one of those farther north because of all the people who live in Arlandria and Lynhaven, who have no convenient access. Someone, you know, in Potomac Greens can get down to Braddock pretty easily, but we have very little access to the Metro. So it would become a walkable to us, a little over a half-a-mile. I think someone said about .7 miles.

So I just wanted to say that some of us, you know, I think that Alternative D is good because any Kiss and Ride would be on the, you know, Potomac Yard side and we wouldn't have to go over those littler bridges or whatever.

**(1-4-0-7-151, 1):** Alternative D does not seem to provide much of an extra benefit despite the significantly higher overall cost. I do not think any anyone already committed to taking public transport would be turned off by the prospect of having to walk across the tracks on a bridge. It is worth noting that in the District of Columbia, work was recently finished on a pedestrian/bike bridge which allows access to the Rhode Island Avenue Metrorail station from the west side of a freight track right-of-way.

**Response:** Regarding pedestrian access for Build Alternative D relative to the other alternatives: The station facilities in each Build Alternative were designed to facilitate convenient pedestrian access. However, as described in the Draft EIS, Section 2.5.3.2, the alternative station locations differ in terms of the future numbers of residents and employees within walking distance based on adopted small area plans. Following the public comment period, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria. The City considered a range of factors in its selection, including pedestrian access. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-4-0, 1)

#### 5.5.4.5 Potomac Greens Neighborhood

**(1-4-28-1-90, 1):** Alternative A and D clearly do not meet our expectations of having chosen Alexandria as our home.

**Response:** Regarding potential impacts of Build Alternative D on the Potomac Greens neighborhood: Following the public comment period, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria. The City considered a range of factors in its selection, including impacts on neighborhoods in the project vicinity. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-1-28, 1)

#### 5.5.4.6 Support Build Alternative D

**(1-4-25-1-94, 1):** But I was looking forward to a new Metro station. And in fact, I was hoping for Alternative D, one of those farther north because of all the people who live in Arlandria and Lynhaven, who have no convenient access. Someone, you know, in Potomac Greens can get down to Braddock pretty easily, but we have very little access to the Metro. So it would become a walkable to us, a little over a half-a-mile. I think someone said about .7 miles.

So I just wanted to say that some of us, you know, I think that Alternative D is good because any Kiss and Ride would be on the, you know, Potomac Yard side and we wouldn't have to go over those littler bridges or whatever.

**(1-4-25-8-108, 1):** B-CSX! Or D! Please

**Response:** Following the public comment period, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria. The City considered a range of factors in its selection, including those resource areas and factors listed in the comments received as well as all other resources and factors evaluated in the Draft EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-2-25, 2)

#### 5.5.4.7 Wetlands / Waters of the U.S.

**(3-4-60-2-161, 48):** The impact tables do not indicate there will be impacts to streams however page 3-170 states that there will be a crossing of Four Mile Run with Alternative D which includes bridge piers. This would be an impact. Also page 2-34, Alternative D, references an existing stream channel. What is this channel? Additional information should be provided discussing the impacts and resources.

**(3-4-60-2-161, 49):** Page 3-225 states that Alternative D would temporarily encroach into Four Mile run for the purpose of constructing a new bridge. If bridge piers are placed in the stream as stated in other sections of the DEIS this is a permanent impact. Other activities may result in temporary impacts.

**Response:** The Draft EIS, Section 3.14, Waters of the United States (Wetlands), Table 3-36 lists impacts to other Waters of the U.S. (WOUS), which include streams, in addition to wetlands. For Alternative D, these impacts to streams are depicted in Figure 3-85. The comment correctly points out that the tables and text in the Chapter 2, Section 2.5, Evaluation of Alternatives and Table 3-1 Summary of Impacts list Build Alternative D's impacts to 0.52 acres of streams as impacts to "wetlands" rather than as impacts to "WOUS." This typo will be corrected and the impacts to streams will be clarified in the Final EIS.

The existing stream channel (labeled WOUS-2), which is a tributary of Four Mile Run, is unnamed.

With regard to Build Alternative D's impact to Four Mile Run related to the placement of bridge piers, the comment correctly notes that the discussion of temporary construction impacts as opposed to the permanent impacts associated with the bridge piers is unclear as written in Section 3.24. For the Preferred Alternative, any discussion in the Final EIS on this issue will be clarified as needed.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period for the Final EIS, FTA will issue its Record of Decision (ROD) which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (3-4-60, 1)

## 5.5.5 General Comment

### 5.5.5.1 Air Pollution

**(3-5-45-2-161, 25):** While the DEIS does include a short section analyzing Greenhouse Gas (GHG) emissions, and concludes there will be no substantial impact, we believe the Council on Environmental Quality's December 2014 revised draft guidance for Federal agencies' consideration of Greenhouse Gas (GHG) emissions and climate change impacts in NEPA outlines a reasonable approach, and we recommend that FTA use that draft guidance to help outline the framework for its analysis of these issues. Accordingly, we recommend the EIS include an estimate of the GHG emissions associated with the project, qualitatively describe relevant climate change impacts, and analyze reasonable alternatives and/or practicable mitigation measures to reduce project-related GHG emissions. In addition, we recommend that the NEPA analysis address the appropriateness of considering changes to the design of the proposal to incorporate GHG reduction measures and resilience to foreseeable climate change. The final EIS should make clear whether commitments have been made to ensure implementation of design or other measures to further reduce GHG emissions or to adapt to climate change impacts.

**(3-5-45-2-161, 26):** Page 3-154 Mitigation measures for Greenhouse Gas Emissions should be discussed.

**Response:** Further detail regarding these project elements will be developed and presented in the Final EIS. This will include additional qualitative discussion of Greenhouse Gas (GHG) emissions consistent with CEQ guidance under the direction of FTA. The project is a transit facility, which typically results in net reductions in GHG emissions as a result of shifting a share of the area's personal automobile trips to mass transit. As described in Section 3.11.3.2 of the Draft EIS, the new Metrorail station is expected to result in reductions in automobile vehicle miles traveled and automobile trips based on travel demand forecasting. As a single infill station (as opposed to a new transit system), total GHGs emitted by the project on an annual basis would be well under the 25,000 metric tons of CO<sub>2</sub> equivalent emissions minimum reference point used by the Council on Environmental Quality guidance (Section III. D., Page 18) for conducting quantitative assessments of GHG emissions. The operations of the single station would generate an insignificant amount of energy use and resulting GHG emissions. Thus, the project would have no substantial impact on GHG emissions, and no mitigation measures of direct climate change impacts by the project are proposed.

Draft EIS, Section 3.19, Sustainability, states that Build Alternative B will be designed consistent with the local sustainability requirements. Station design features that comply with green building policies and objectives, such as LEED Silver Certification, that aim to reduce energy use among other goals, would be developed during detailed design phases of the project. A reference to this section will be added in the Final EIS section on GHG emissions. (3-5-37, 2)

**(4-5-45-2-183, 1): ENVIRONMENTAL IMPACTS AND MITIGATION**

3. Air Pollution Control. The Draft EIS discusses air quality impacts and mitigation (section 3.11) and concludes that the change in air quality attributable to any of the "build alternatives" would be negligible or beneficial since the project would not result in additional pollutant emissions, as measured by slight reductions in vehicle trips and vehicle miles traveled (Table 3.28, page 3-154, section 3.11.3.2).

3(a) Agency Jurisdiction. DEQ's Air Division, on behalf of the State Air Pollution Control Board, is responsible for developing regulations pursuant to Virginia's State Air Pollution Control Law (Virginia Code sections 10.1-1300 et seq.). DEQ carries out mandates of the state law and the 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 Air 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 regional office (DEQ's Northern Regional Office) is directly responsible for the issuance of necessary permits to construct and operate all stationary sources in the region as well as to monitor emissions from these sources for compliance.

3(b) Findings. According to the Air Division, the project is in an ozone non-attainment and emission control area for oxides of nitrogen (NOx) and volatile organic compounds (VOCs).

3(c) Comments. All precautions are necessary to restrict emissions of NOx and VOCs.

3(d) Regulatory Requirements. According to the Air Division, the project may be subject to the following requirements:

- Fugitive dust control, 9 VAC 5-50-60 et seq. in the above-mentioned Regulations;
- Open burning, 9 VAC 5-130 et seq. in the Regulations; and
- Asphalt paving operations, 9 VAC 5-45-780 et seq.

In addition, the use of fuel-burning equipment (boilers, generators, compressors, or any other equipment that emits air pollution) may be subject to 9 VAC 5-80, Article 6, "Permits for New and Modified Sources." See "Regulatory and Coordination Needs," item 3, below.

**(4-5-45-2-194, 1): REGULATORY AND COORDINATION NEEDS**

3. Air Pollution Control.

3(a) Coordination. Questions relating to permitting requirements and other air pollution control requirements may be directed to DEQ's Northern Regional Office (James LaFratta, telephone (703) 583-3928 or james.lafratta@deq.virginia.gov) .

3(b) Authorities. As indicated above ("Environmental Impacts and Mitigation," items 3(a) and 3(d)), the authorities for DEQ's air pollution control activities include, but are not limited to, the State Air Pollution Control Law, Virginia Code sections 10.1-1300 et seq. and the following provisions of the Regulations for the Control and Abatement of Air Pollution:

- Fugitive dust control, 9 VAC 5-50-60 et seq. ;

- Open burning, 9 VAC 5-130 et seq.;
- Asphalt paving operations, 9 VAC 5-45-780 et seq.; and
- Permitting of fuel-burning equipment, 9 VAC 5-80, Article 6, "Permits for New and Modified Sources."

**(4-5-45-2-208, 1):** NRO comments regarding the Draft Environmental Impact Statement for FTA : Potomac Yards Metrorail Station .

**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. Lastly, should any open burning or use of special incineration devices be employed in the disposal of land clearing debris during demolition and construction, the operation would be subject to the Open Burning Regulation 9 VAC 5-130-10 through 9 VAC 5-130-60 and 9 V AC 5-130-100.

**Response:** All permitting requirements relating to air quality will be coordinated with the Virginia Department of Environmental Quality (DEQ) and other local and federal agencies as applicable. The project will comply with all applicable regulations regarding air quality. Best management practices to minimize air pollutant emissions during construction and operation of the project will be described in the Final EIS. (4-5-45, 1)

**(4-5-45-2-206, 1):** All precautions are necessary to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NOx).

**Response:** As described in Section 3.24 of the Draft EIS, to minimize construction-related effects on air quality, project construction activities would comply with Virginia Department of Environmental Quality (VDEQ) requirements for fugitive dust and emissions, as well as any local regulations. During later design phases, potential construction impacts will be re-evaluated to better gauge the likelihood of impacts, and measures will be developed to minimize and mitigate them as needed. (4-5-45, 2)

**(1-5-60-2-175, 1):** Sheer difference in density makes Alt A preferable from an environmental impact standpoint. Alt A=9.25 vs AltB=13.08. This density difference will affect energy usage, water treatment, recycling needs. Vehicles are well-accommodated by underground parking with no incentives to "own no car" ... density matters as this will translate to increased GHG. [...]

**Response:** The greenhouse gas emissions associated with development in Potomac Yard were not assessed in the Draft EIS. The general impacts of Potomac Yard development are discussed in Section 3.23, Secondary and Cumulative Effects. With regard to development density, the higher development volume permitted in Potomac Yard under Build Alternative B would provide more opportunities for housing and commercial uses close to the region's core in a location with Metrorail access, resulting in fewer and shorter automobile trips than if the same development were to occur farther from the core in a site without walkable Metrorail access.

#### 5.5.5.2 Amtrak, VRE, and CSX Impacts

**(4-5-2-2-189, 1):** 9(a) Agency Jurisdiction. According to its web site, the Department of Rail and Public Transportation (DRPT) tries to improve mobility of people and goods in Virginia while expanding transportation choices. To do this, DRPT assists in managing congestion on highways, improves access to transportation choices for public and businesses, provides access and improvements to railways to encourage economic development and reduce highway traffic. DRPT also promotes consideration of transportation options.

9(b) Perspective on DPRT Involvement. DRPT is a participating agency in the DEIS and the state agency responsible for improving access for the general public and businesses in the Commonwealth through increased transportation choices (including transit and passenger rail) and providing access improvements to Virginia's railways to encourage economic development and reduce traffic on Virginia's highways. DRPT provides annual operating and capital assistance to the Washington Metropolitan Area Transit Authority (WMATA), the Virginia Railway Express (VRE), and the City of Alexandria through the Northern Virginia Transportation Commission (NVTC). DRPT also provides rail enhancement and industrial access grants to CSX as well as operating and capital funding to both Amtrak and CSX on an annual and multi-year basis. DRPT is also preparing a Tier II Environmental Impact Statement (EIS) for the Southeast High Speed Rail corridor between Washington, D.C. and Richmond, which will serve Alexandria. Finally, DRPT notes that the City of Alexandria has consulted with CSX and commends the City for developing Alternative B-CSX in developing the conceptual plans for this alternative.

9(c) Rail Transportation Status. Currently, there are 4.5 long-distance Amtrak daily round trips (9 trains) and 7 regional, state-supported daily round trips (14 trains) for a total of 11.5 round trips or 23 trains per day (the Cardinal operates three times per week for a 0.5 round trip). On the Virginia Railway Express, which receives state funding for capital and operations, there are 7 round trips (14 trains) on the Fredericksburg line and 8 round trips (16 trains) on the Manassas line for a total of 15 round trips or 30 trains per day. Both VRE lines and all Amtrak trains utilize the segment of track adjacent to the proposed Potomac Yard Metrorail station. In Fiscal Year 2015 (FY15), DRPT provided \$9.0 million in operating assistance and \$13.0 million in capital assistance to VRE.

**(4-5-2-212, 1):** DRPT is a participating agency in the DEIS and the state agency responsible for improving access for the general public and businesses in the Commonwealth through increased transportation choices (including transit and passenger rail) and providing access improvements to Virginia's railways to encourage economic development and reduce traffic on Virginia's highways. DRPT provides annual operating and capital assistance to the Washington Metropolitan Area Transit Authority (WMATA), the Virginia Railway Express (VRE) and the City of Alexandria through the Northern Virginia Transportation Commission (NVTC). DRPT also provides rail enhancement and industrial access grants to CSX as well as operating and capital funding to both Amtrak and CSX on an annual and multi-year basis. Finally DRPT is preparing a Tier II Environmental Impact Statement (EIS) for the Southeast High Speed Rail corridor between Washington, DC and Richmond, which will serve Alexandria. Finally DRPT notes that the City of Alexandria has consulted with CSX and commends the City for developing Alternative 8-CSX in developing the conceptual plans for this alternative.

**Response:** Comment noted. Design and construction activities for the preferred alternative will be coordinated with Virginia DRPT, CSXT, Amtrak, and Virginia Railway Express as needed. (4-5-2, 1)

**(4-5-2-2153, 1):** Any actions that have the potential to degrade VRE operations are troubling. I am writing to share VRE concerns regarding the Potomac Yard Metrorail station alternatives considered in the DEIS. We believe the Alternative B-CSX Design Option would have a substantial negative effect on VRE commuter rail operations due to the impact of construction activities within and adjacent to the CSXT right-of-way. Combined with similar negative impacts to Amtrak intercity trains, which also use the CSXT right-of-way, and freight traffic, the effect on railroad operations will be significant.

The Draft EIS indicates the realigned CSXT tracks would be constructed first and railroad traffic shifted to the new alignment. Once the CSXT track work is complete, construction of the Metrorail station would begin; the total construction period is estimated to be two years. Primary access to the construction area is from the western side of the CSXT right-of-way across the active CSXT tracks. Although the DEIS indicates B-CSX Design Option will require "extensive preplanned outages on CSXT track", it fails to evaluate the effect of the outages on railroad operations or the potential for daily, unplanned stoppages of train traffic to allow construction workers, vehicles and equipment to cross the CSXT right-of-way to access the Metrorail station construction site or the potential for the imposition of slow orders for trains operating within the CSXT right-of-way for the duration of the construction period [...]

As an illustration of the effect railroad construction can have, extensive CSXT and Norfolk Southern track work in 2005 and 2006 had a significant, negative effect on VRE on-time performance. VRE on-time performance dropped to a low of 50% on the CSXT-Fredericksburg Line. On the Norfolk Southern-Manassas Line on-time performance dropped to 68% during track construction. The impact of the decline in on-time performance was seen directly in VRE ridership which decreased by seven percent and took two years to recover to where it was prior to the start of the track work. With on-time performance currently averaging 95 percent, the ability to sustain that level of reliability is critical to VRE's viability as a regional transportation option. I urge the Federal Transit Administration and the City of Alexandria to eliminate the B-CSX Design Option from consideration for the Potomac Yard Metrorail station.

While the B-CSX Design Option poses the greatest potential negative impacts to VRE operations, Alternatives A, B, and D also have the potential to effect train operations in the CSXT right-of-way during construction. I ask that the evaluation of the construction impacts of those alternatives be expanded to provide a more detailed discussion of the effects on train operations within the CSXT right-of-way. In particular, the expected impact of the construction access easement required for Alternative B across a portion of the CSXT right-of-way to enable construction vehicles to get around the west side of the Metrorail traction power station adjacent to the CSXT tracks should be evaluated (e.g., timing, frequency and duration of use). While this easement would not cross the CSXT tracks, its use by construction vehicles will likely affect rail operations. Greater detail on the effect of construction of the pedestrian bridges over the CSXT tracks (and Metrorail tracks in Alternative D) on rail operations should also be provided.

Finally, as the design and construction of the selected Locally Preferred Alternative is advanced, all efforts should be made to avoid and minimize effects on the CSXT right-of-way and train operations. Ongoing coordination should be maintained with VRE, as well as CSXT, to ensure information regarding planned or unplanned rail traffic stoppages or slow orders is available to VRE operations personnel.

**(4-5-3-2-74, 1):** VRE is a commuter rail provider; we operate 30 trains a day within the CSX right-of-way, between Alexandria and Washington, D.C., and we carry about 19,000 riders each weekday. It's a safe, reliable, and efficient alternative to driving for long distance commuters.

Currently, VRE service removes the equivalent of a lane of traffic on both I-95 and I66 travel corridors in the morning and evening rush hours. On-time performance is at near record highs with approximately 95 percent of the trains arriving at their final destination within five minutes of their scheduled arrival time. This is very important to VRE riders as a top influencing factor in their decision to ride on VRE. Any actions that have the potential to degrade VRE operations are of great concern.

We believe the CSX design option will have a negative effect on VRE commuter rail operations due to the impact of construction activities within and adjacent to the CSX right-of-way, combined with similar negative impacts to Amtrak city trains, which also use the CSX right-of-way, freight traffic and we believe the railroad operations will therefore, be significantly affected.

The Draft EIS indicates the realigned CSX tracks would be constructed first and railroad traffic shifted to the new alternative or into the new alignment. Once the CSX tracks are complete, construction of the Metrorail station would begin. Primary access to the construction area is from the western side of the CSX right-of-way, across the active CSX track. While the DEIS does not indicate the length of the construction period for realigning the CSX track versus the Metrorail construction, the total construction period is estimated at two years.

Although the DEIS indicates the CSX design option will require extensive preplanned outages on the CSX track, it fails to evaluate the outages on railroad operations and the effects of daily unplanned stoppages of train traffic to allow construction workers, vehicles and equipment to cross the CSX right-of-way to access the Metrorail station construction site or the potential for the imposition of slow orders for trains operating within the CSX right-of-way for the duration of the construction period.

The uncertainty of the types and levels of potential construction impacts associated with the CSX design option and the lack of detailed evaluation of those impacts on railroad operations are serious concerns for VRE. The segment of track is used by all VRE trains and any activities that effect travel on the rail corridor can have a devastating effect on our operations.

Queueing of the trains through the construction site will become commonplace during the duration of the construction, due to the slow orders and so forth.

**Response:** Regarding potential effects of the Build Alternatives on VRE, Amtrak, and CSXT rail service: As a result of the City of Alexandria's adoption of Build Alternative B as the preferred alternative for the project on May 20, 2015, neither B-CSX Design Option nor Build Alternative D will be advanced further. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

Construction activities for the preferred alternative will be scheduled and coordinated with CSXT, Amtrak, and Virginia Railway Express to avoid or minimize impacts to operations of freight, commuter, and passenger rail services along the CSXT line. (4-2-50, 1)

**(4-5-2-2-189, 2):** 9(g)(iii) Engineering Evaluation. The project engineering team from HDR reviewed the alternatives and noted that the vertical clearance over CSX is not correct. It is shown as 23', but should be 24'-3" for new structures over CSX. The design criteria account for a "future" CSXT track (40' total - 15' from centerline of track to future and 25' to pier/crash wall).

**Response:** The design criteria for clearance of the CSXT railroad tracks will be reviewed in the Final EIS. The designs for the build alternatives included in the Draft EIS meet the updated horizontal and vertical criteria stated in your comment and accommodate the future addition of a fourth CSXT track. (4-5-50, 1)

#### **(4-5-50-2-190, 1): ENVIRONMENTAL IMPACTS AND MITIGATION**

9(g)ii DRPT Alternatives Criticism.

[...]

While temporary construction impacts are evaluated, the DEIS does not assess the impact on VRE. While the Technical Memorandum in Appendix 18 addresses CSX operation, it does not adequately assess the construction impacts on freight or passenger rail operation. For example if slow orders or stoppages are issued for passenger trains, on-time performance for VRE would be negatively impacted and ridership would likely decrease. Would all three existing tracks remain in operation outside of temporary stoppages during construction? What degree of temporary stoppages would be issued during construction? If Alternative B-CSX or D is chosen, the construction impacts on VRE and freight rail should be fully evaluated during preparation of the Final EIS, and every attempt to mitigate adverse impacts should be included in the Record of Decision.

**(3-5-50-2-10, 1):** Amtrak operates over 20 trains per day on the CSX owned tracks that run through the study area.

Amtrak's comments focus on construction sequencing of the selected alternative. We ask that our train schedules be considered during construction of any alternative so there is no impact on Amtrak operations.

**Response:** As a result of the City of Alexandria's adoption of Build Alternative B as the preferred alternative for the project on May 20, 2015, neither B-CSX Design Option nor Build Alternative D will be advanced further. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

Construction activities for the preferred alternative will be scheduled and coordinated with CSXT, Amtrak, and Virginia Railway Express to avoid or minimize impacts to operations along the CSXT line. As a result of the City of Alexandria's adoption of Build Alternative B as the preferred alternative for the project on May 20, 2015, neither B-CSX Design Option nor Build Alternative D will be advanced further. (3-5-50, 1)

**(4-5-31-2-212, 3):** 9(h) Relation of Potomac Yard Station to Other Projects

9(h)i Southeast High-Speed Rail Project. Regarding the Washington, DC to Richmond segment of the Southeast High-Speed Rail project that DRPT is managing ([www.DC2RVARail.com](http://www.DC2RVARail.com)), DRPT's proposed alignment alternatives would work with any of the four Potomac Yard alternatives identified in the Draft EIS. Potomac Yard Alternatives A, B and D shows no change to the CSX track alignment, but DRPT's proposed alignment alternatives show some slight straightening to improve speed.

**Response:** Comment noted. (4-5-31, 1)

### 5.5.5.3 Bicycle Access

**(4-5-18-2-212, 1):** DRPT also encourages the City of Alexandria and WMATA to consider multimodal access to the station. DRPT understands that the proposed station is an urban infill and does not require daily long term parking. While it appears that pedestrian access is adequate from the conceptual design plans, full consideration should be given to adding bus bays and bike parking. Short term bike parking should be covered and bike lockers should be considered for monthly storage.

**(1-5-19-2-11, 1):** Some colleague of mine in the Complete Streets advocacy community were present at this week's Alexandria Transportation Commission meeting when discussion turned to the Potomac Yard Metro station plan. From their discussions with your representatives, it became apparent that bike access and parking were being treated as an afterthought [...]

I'm a little astonished that so little emphasis has been given to this vital component of the first/last mile of the commute. I would have thought the debacle of too few bike racks and poor access to the new Silver Line stations would have served as a wake-up call.

If this is not the case and WMATA fully intends to ensure full access and plentiful, secured parking for bikes, then I strongly suggest that you publicize your specific plans immediately. Metro cannot afford to be seen at this critical time as not being able to learn from past mistakes.

**(1-5-19-2-50, 1):** As part of the metro station design, will consideration be given to (a) safe ways for people to ride bikes to/ from the metro station, from Jefferson Davis Hwy and Glebe Rd, and (b) any thoughts about a bike overpass over the tracks and over GW pkwy to connect to the Mt Vernon trail? That would really be a nice enhancement to the area's trail system?

**(1-5-19-2-54, 1):** During the construction process for the Potomac Yards Metro Station, would it be possible to add to build a pedestrian/ bicycle tunnel/bridge under/over the George Washington Parkway so that people may access the wonderful Mount Vernon Trail and Daingerfield Island from the new metro station?

**(1-5-19-2-139, 1):** I am writing to request that you ensure that a new Metro station at Potomac Yard will include bike facilities. This includes plenty of covered bike rack; bike lockers; safe and well-lighted access from Potomac Greens and Potomac Yard that is open 24 hours a day and doesn't require dodging pedestrians; and a Capital Bikeshare station.

A 2012 bike parking census done by WMATA showed that the nearby Braddock Road station had the most bikes parked of any station in the entire Metro system. The Potomac Yard station will be poised to attract large numbers of cyclists, especially as development continues in that area. Please don't repeat the mistake that was made with the McLean station, where racks weren't originally planned and then even what was provided wasn't enough and additional ranks had to be added [...]

The Potomac Yard station is an opportunity for the City to prove it wants to provide complete streets. Please plan the new station in a way that supports and encourages people who are reducing their impact on the streets and environment.

**(1-5-19-2-140, 1):** I urge you to think big and bold when it comes to providing bike facilities for the new Potomac Metro stop in Alexandria VA. I know you are planning to put in a secure, card access bike locker areas, at the King St metro - just like the one at College Park. But I urge you to think even bigger and consider a bike station - where a metro rider can park their bike, change their clothes (if needed) and also get the bicycle repaired by a mechanic. The city of DC put one of these in next to Union Station, so I urge you to make room if you plan to put one at Potomac Metro. Since Potomac metro is one of the few infill stations of the network, I think you need to showcase how a good mixed used transit hub can work by encouraging a mixed use design where the station is supported by on site facilities to make biking and walking the most convenient form of alighting the system.

**(2-5-19-5-168, 1):** At the Transportation Commission meeting I brought up my concerns about the overall design of the station. I realize the station design at this point is just a draft but wanted to ensure that the design be the most efficient in moving people to the station. This station should be an example of outstanding accessibility for a Metrorail station. It is an obvious conclusion that the ease of accessibility of the station has a direct impact on the station usage. This station is an urban station which will result in a high number of people walking and cycling to the station. The station design should reflect the ease of accessibility for these modes of transportation [...]

Accessibility applies not only at the station itself but from the time the transit user walks out their front door. They have the options of walking, cycling, or being driven. They also can take a bus on their way to the station. The infrastructure for walking and cycling should be readily available and safe as to encourage these modes. Strong encouragement for these modes will reduce the tendency for using their cars. The bus routes to the station should be within reasonable walking distance [...]

For people cycling to the station the following considerations should be incorporated.

- For those who would bike to the Potomac Yard station, safe bike facilities should be throughout the area. These should be protected bike facilities whenever possible so as to encourage the 60% of cyclists who are casual riders.
- Capital Bikeshare stations should be located within easy access to those who wish to bike to the station.
- Capital Bikeshare stations should be located at both the entrances to the station. These stations should be adequate to accommodate users at the opening of the station but future users.
- Once at the station cyclists should have adequate bike parking which is covered, secure and large enough to accommodate current and future users. This would include bike lockers.
- Since many of the cyclists will be using Capital Bikeshare large bike stations should be situated on both sides of the tracks [...]

General comments:

-Since the station will have accessibility from both sides of the tracks, pedestrians and cyclists should have 24 hour access to cross the tracks.

In summary, accessibility, particularly for people who walk and bike should be incorporated into the details design efforts, addressing as many of the features delineated above as possible.

**(1-5-19-2-171, 1):** Simply put, adequate biking facilities at and near the station, to include access paths, parking, and space to maneuver a bike, will make me far more likely to ride to, and hence utilize, the station. I live in South Arlington and would arrive via the Four Mile Run trail.

**(2-5-19-2-58, 1):** I am writing to request that the Potomac Yard Metro Station design include bike access and covered secure bike parking [...]

Because the Potomac Yard Metro is in the planning phase, now is the time to incorporate secure, well lit, covered bicycle parking. Additionally, care should be taken to ensure cyclist can safely access the parking with protected bicycle lanes.

The Potomac Yard Metro will attract many riders from Del Ray and Alexandria. These people will be the riders even before the area around the new station is built up w/ new retail and housing.

It is important that bicycle planning is included in the initial design.

**(6-5-19-2-155, 1):** BPAC members are excited about the prospect of a Metro Station in Potomac Yard, and ask that “bicycle accessibility” be included in the Metro Station design efforts. As an urban station, biking and walking will be primary means of accessing this station; including accessibility and covered and secure bike parking in the design will ensure safe and secure access and bike parking for people who walk and bike.

Please include these specific features in the station design as part making the Potomac Yard Metro station “bike accessible”. These features will help WMATA achieve its goals to increase biking mode share to Metro stations!

(1) Safe pathways

- a. Designed for the 60% of people who are casual riders, not just experienced riders.
- b. Designed to/from the station, from both the east and west, deconflicted from pedestrian access
- c. Designed to enable 24/7 bike access to/from Potomac Greens to Potomac Yard

(2) Covered, Safe and Secure Bike parking.

- a. A Bike and Ride facility, similar to or adapted from Metro’s 2012 prototype at the U. of Md College Park station.
- b. Secure bike lockers and standard, covered bike racks in sufficient quantities for initial and future demand.
- i. Avoid under-estimating demand for bike parking as was the recent case for Silver Line stations. At the McLean station, for example, an additional 40% needed to be added immediately after the station opened.

(3) Bikeshare: 1/3 of Metro stations have Bikeshare stations today. Bikeshare needs to be part of the design effort to make the Potomac Yard Metro station bike accessible.

Please include “Bike accessibility” in the Potomac Yard Metro Station design effort, and include features such as safe pathways (deconflicted from pedestrian pathways), covered and secure bike parking (including a Bike and Ride facility), and Bikeshare.

**Response:** The Draft EIS, Section 2.4, Build Alternatives, notes that all station alternatives incorporate a pedestrian and bicycle bridge between the Potomac Yard and the Potomac Greens neighborhoods that will be open 24 hours a day. Bicycle parking facilities will be provided at each station entrance in accordance with Metro station access guidelines and design criteria. More detailed design of these facilities will be included in future project design phases after the conclusion of the NEPA review process. The City of Alexandria is responsible for planning bicycle access between the station and surrounding origins/destinations. All comments received on the Draft EIS have been reviewed by the City of Alexandria. (1-1-8, 1)

#### 5.5.5.4 Blue and Yellow Line

**(1-5-8-2-17, 1):** While I am a supporter of the Potomac Yard Metro Station, the failure of the draft EIS to address crowding on MetroRail trains that will be serviced by the Potomac Yard station is an unfortunate oversight. In particular, the EIS should consider whether WMATA can handle the additional passenger load on the Blue Line during rush hour that will come from the station, and if not what service adjustments are necessary. There is precedent for this nature of discussion in the EIS for new Metrorail stations, as passengers-per-car analysis for the Orange Line was included in the discussion of the new Silver Line stations.

WMATA's current planning standards dictate that the maximum load for planning purposes is 100 passengers per car (pg 5-9 of WMATA MetroRail Fleet Management Plan 4G, 2012). The Blue Line already exceeds this maximum planning capacity during the afternoon rush hour and is the most crowded line in the WMATA system. Therefore, without additional service on the line, by definition it is not possible for WMATA to add riders to the line through a new station while staying within the planning guidelines unless service adjustments are included.

Since WMATA's ability to successfully manage the additional ridership that the station will generate while staying within their planning guidelines is a crucial aspect of building a new Metrorail station, the EIS should include a discussion of how WMATA will accommodate the additional 10,000 boardings per day that the station is projected to generate. I very much hope that the revised EIS includes such a discussion.

**(1-1-8-1-78, 1):** The current conditions on the blue lines are already deplorable, and there is no discussion on the effects of an additional station.

**(1-5-8-7-151, 1):** 1) WMATA reports Metrorail reached and exceeded its design capacity 10 years ago. No new metro station is justified which adds ridership to an overcapacity system unless the vast majority of net new riders are in the counterflow direction. Flow versus counterflow ridership needs to be calculated and reported related to the new metro station.

**(1-5-8-2-224, 1):** Discussion about the current and projected conditions on the Blue line.

The current conditions on the Blue line are already deplorable, and there is no discussion on the effects of an additional station.

**Response:** Regarding existing passenger crowding along the Metrorail Blue Line within Virginia during peak travel periods: Metro's Momentum strategic plan lays out recommendations to address Metrorail passenger crowding and other issues through the year 2025. (1-1-8, 1)

**(1-5-8-1-93, 1):** I haven't heard any comments about all of the people who will use this station who are coming from other parts of the area: coming from Huntington and so forth, or coming through the city who will see the new station but won't get off. I'm thinking they're probably not for this station because if they're coming through the city, they want to get to work, quickly and this new station will slow them down.

**Response:** The Draft EIS, Section 3.2.3.2 Build Alternatives, Rail Operations, estimates that the additional station would result in one additional minute of travel time along the Metrorail Blue and Yellow Lines between Braddock Road Station and Ronald Reagan Washington National Airport Station. (1-5-8, 1)

**(1-5-8-2-26, 1):** The DEIS only briefly mentions that shutdowns of service on the Blue/Yellow lines between Braddock Road and National airport would be necessary for the construction of the Potomac Yard station (see p. 3-8 and p. 3-208). But the EIS does not elaborate as to how often and how lengthy these closures would be, nor does it indicate whether certain alternatives would require more and/or longer closures than others. (The February 2013 Construction Impacts Technical Memorandum, at p. 5, implied that Alternative B would be the least disruptive – but without details, and the B-CSX Design Option was not separately addressed.) Given the potential impact of such closures on Metrorail riders and Alexandria as a whole, this appears to be a matter that should have been addressed in the DEIS, and must be more specifically elaborated upon as the process moves forward.

**Response:** Regarding disruptions of service along the Metrorail Blue and Yellow Lines by the project: The Draft EIS, Section 3.24, Construction Impacts, subsection 3.24.3.2, page 3-208, discusses effects of the project construction on Metrorail operations. More details regarding the frequency, duration, and type of service outages will be confirmed during the final design phase of the project when the details of the project components and construction scenarios are finalized. (1-5-8, 2)

**(1-5-8-2-59, 1):** The location for the Potomac Yard Metro Rail Station was established in the Metro System Master Plan that was adopted about 1975-76. The property for that station location is reserved and available. There are signs on the ground at the station location, identifying it as such -- unless someone removed them recently.

It is a shame on the City of Alexandria that this station has not been constructed long ago. It is a shame on the city of Alexandria that the City has allowed the land around the 1970's-agreed station location to be developed in ways that are not the best surroundings for a Metro Rail Station. It is a shame on the City of Alexandria that the city agreed to a relocation of the main through rail lines away from the Route One highway side -- where the main rail lines used to be located -- toward the eastern boundary of Potomac Yards so the railroad could get maximum short-term development profit from an automobile-oriented big-box retail mall development [...] with the result that the 1970's-agreed Metro Rail Station location has become rail-isolated.

However, this history of short-sighted decisions and lassitude by the City of Alexandria cannot be undone now. The Potomac Yards Metro station should still be constructed, soon, where it was agreed to be sited in the 1970's Metro Plan. The National Park Service lands of the George Washington Memorial Parkway must not - by law or morals - be sacrificed to move the station onto Parkway land or easements. The City should not pay -- and City taxpayers should not pay -- extra costs to move the Metro Rail station from the 1970's location to a site more profitable or the Potomac Yards property owners.

**Response:** Regarding the history of planning and building the portions of the Metrorail Blue and Yellow Lines within the City of Alexandria: The Draft EIS, Section 2.1 describes the local planning process for the project, including past efforts. (1-5-8, 59)

#### 5.5.5.5 Climate Change and Sea Level Rise

**(1-5-60-2-175, 1):** Sheer difference in density makes Alt A preferable from an environmental impact standpoint. Alt A=9.25 vs AltB=13.08. This density difference will affect energy usage, water treatment, recycling needs. Vehicles are well-accommodated by underground parking with no incentives to "own no car" ... density matters as this will translate to increased GHG. There are no "green roofs" discussed. No "traps" for storm runoff filtration, etc.

Negative impacts are reflected in all comparative:

- increased impervious area A(1.82) vs B(2.24). What is the heat island effect?
- natural habitat loss A(.03) vs B(2.50)
- 100 Yr Floodplain A(0) vs B(1.48 all east of existing Metrorail track). The base flood level will soon be raised (via Executive Order) from 10 to 12 or 13 feet. We are building behind the curve.
- number trees removed from original GWPW design A(5-10) vs B(15-20) Note: these are very mature trees. Acres of trees removed: A(.48) vs B(2.44)
- the buffering effect for sea level rise and near term storm surges is significantly better for AltA than Alt B
- while the "Green Scenic Easement" (1.71acres) sounds like beautification, it is in fact an alternative way to conserve vegetation, wetlands, improve water quality etc. It is high value.

Finally, any net benefit trade off or offset that features Daingerfield Island can realistically be expected to include "improvements" that include residential development on the river. While this may seem unlikely now, it is part of a well-worn and established pattern of the City of Alexandria. With density equaling tax dollars, this is tough to avoid. In addition, Daingerfield Island is in a FEMA designated floodplain and performs excellent buffering action right now - it should be retained as such ... at no cost.

**(3-5-61-2-161, 29):** The discussion on page 3-198 refers the reader to section 3.15 for mitigation measures related to flooding and climate change. The discussion is vague. More information should be provided as to how the project will be designed to address any potential issues.

**Response:** The Draft EIS, Section 3.23, Secondary and Cumulative Effects, discusses the potential effects of climate change on the project, including sea level rise. These effects are described as Cumulative Effects and discussed specifically in subsections 3.23.1.2 and 3.23.4.

With regard to mitigation of flooding and sea level rise impacts to climate change, a commitment to incorporate resiliency measures for foreseeable cumulative climate change impacts, in particular flooding, will be added in the Final EIS, including elevation of structures above the 500-foot floodplain.

With regard to greenhouse gas (GHG) emissions, the project is a transit facility, which typically results in net reductions in GHG emissions as a result of shifting a share of the area's personal automobile trips to mass transit. As described in Section 3.11.3.2 of the Draft EIS, the new Metrorail station is expected to result in reductions in automobile vehicle miles traveled and automobile trips based on travel demand forecasting. As a single infill station (as opposed to a new transit system), total GHGs emitted by the project on an annual basis would be well under the 25,000 metric tons of CO<sub>2</sub> equivalent emissions minimum reference point used by the Council on Environmental Quality guidance (Section III. D., Page 18) for conducting quantitative assessments of GHG emissions. The operations of the single station would generate an insignificant amount of energy use and resulting GHG emissions. Thus, the project would have no substantial impact on GHG emissions, and no mitigation measures of direct climate change impacts by the project are proposed. The Final EIS will incorporate this additional clarification stated above.

With regard to the density associated with Build Alternative B, as described in Section 3.23.3.2, the indirect effects of the increased development allowed under Build Alternative B include providing more opportunities for housing and commercial uses close to the region's core in a location with Metrorail access, resulting in fewer and shorter automobile trips than if the same development were to occur farther from the core in a site without walkable Metrorail access.

With regard to general flooding and stormwater management, see response in Section 5.5.5.18. (1-5-60, 1)

#### 5.5.5.6 Comment not Pertaining to Project

(1-5-38-2-19, 1): Tell me what to do!

**Response:** The comment does not pertain to the Potomac Yard Metrorail Station EIS or project in general. No response is provided in this document. (1-5-37, 4)

#### 5.5.5.7 Community Facilities

(1-5-57-8-124, 1): With all the new housing that will be introduced to the area, will there be a new school added. The current school situation already suggests we are overcrowded.

**Response:** The Draft EIS, Section 3.23.3, Secondary Effects, discusses effects to the study area from increased development under the No Build Alternative and Build Alternatives. As noted in subsection 3.23.3.1, small area plans of the City of Alexandria and Arlington County address the adequate provision of community facilities for the population within Potomac Yard and surrounding areas. (1-5-57, 1)

#### 5.5.5.8 Consistency with Other Plans

(1-5-16-2-154, 1): In the screening process also contains serious flaws in evaluating plans for George Washington Memorial Parkway (GWMP) as "Zoning and Local Plans" at Table 2-4 and accompanying language of the DEIS. The GWMP does not have "zoning" and it is not a "local plan." The purposes and direction for the GWMP are established by the designation of the GWMP as a unit of the National Park system and subject to the provisions of the NPS Organic Act, Management Policies, and related authorities [...]

Lastly, Table 2-4 of the DEIS is inconsistent with Land Use, Zoning, and Consistency with Local Plans Technical Memorandum. The Land Use, Zoning, and Consistency with Local Plans Technical Memorandum in Table 3-3 and the associated text indicate that Build Alternative B is inconsistent with plans for the GWMP. The only build alternative that is consistent with plans for GWMP is Build Alternative A. Land use, Zoning, and Consistency with Local Plans Technical Memorandum at pages 19-20. This is not reflected in text of Table 2-4 of the DEIS. The error is a substantial one and could result in a modification of selected alternatives and a false impression to the public and decisionmakers reading the document.

**Response:** To clarify Table 2-4 “Zoning and Local Plans”, the Final EIS will relabel the table as “Zoning, Local Plans, and NPS Plans and Policies.” Additionally in the Final EIS, Consistency with Local Plans (Section 3.5 in the Draft EIS) will include and assess the Organic Act similar to the assessment of the Capper Cramton Act.

The introduction to Volume II of the Draft EIS notes that the technical memoranda were completed in February 2013, after which time some additional and updated analyses were completed for the B-CSX Design Option and Build Alternatives A, B, and D. The additional and updated results are presented in Volume I of the Draft EIS. The Final EIS will more clearly note that some of the analyses contained in the technical memoranda were subsequently updated and that the Draft EIS Volume I reflects the most up-to-date analysis. Additional clarity will be provided by updating Table 3-3 in the Land Use, Zoning, and Consistency with Local Plans Technical Memorandum to reflect the results presented in Table 2-4 of the Draft and Final EIS. (1-5-20, 1)

#### 5.5.5.9 Construction Contracting

**(2-5-58-5-168, 1):** It was brought to my attention that WMATA will manage the contract for the station. I strongly encourage the city work closely with WMATA to ensure all the city’s concerns are addressed.

**(1-5-58-1-95, 1):** The one thing that I do add as a caution is, and one of our neighbors brought it up, was the fiscal, the overruns, the cost overruns. The city is being a financial to this and I think instead of turning everything over to WMATA is to allow some kind of consortium of oversight that includes the city to be part of the decision-making in the design build component of this station being brought online. And I think that would behoove us -- it would be unprecedented, but I think if the city could somehow be part of that process, I think we, as neighbors, would feel more confident that the cost overruns will not happen.

**Response:** The City of Alexandria will have a role in the design of the station. The station design will be approved by the City’s Board of Architectural Review and construction of the station will require permits from the City. Although the City will provide input into the design, the design build contract will be managed by WMATA, which has experience in building similar rail projects in scope and magnitude. (1-5-58, 1)

#### 5.5.5.10 Construction Impact

**(1-5-29-2-159, 1):** Regarding the Proposed Potomac Yard Metro Station, we are concerned about the following issues:

6) There will be severe inconveniences to the Potomac Greens residences during construction. Please explain how this will be mitigated and the timing of the construction period.

**Response:** Regarding construction traffic, noise, and vibration: The Draft EIS, Section 3.24, Construction Impacts, describes potential impacts and identifies broad minimization and mitigation measures. All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision. At this stage of project design, further details regarding the levels, duration, and frequency of construction-related noise, vibration, and fugitive dusts are not available. Project development during the design phase will further define efforts to minimize construction impacts and, for unavoidable impacts, will define methods to mitigate impacts and restore resources to their prior condition.

Regarding construction traffic, further details of the mitigation measures will be developed during the final design phase of the project when details of the project components and the construction scenarios are finalized and a Transportation Management Plan (TMP) will be developed. The TMP will address construction activities related to the project as well as permanent station operations and will be prepared in coordination with VDOT, the City of Alexandria, and other agencies as applicable. (1-2-29, 2)

**(4-5-29-6-244, 1):** In addition, no commercial vehicles are presently allowed on the Parkway without a special exemption granted by the Superintendent of the National Park Service. So will Alexandria seek an exemption to allow truck and construction equipments to operate on the already congested Parkway. If this despensation is given by the National Park Service, what additional construction impact will incur to the parklands, especially the demolition of numerous 20 to 70 year old majestic trees. Unfortunately, the alternative haul routes would adversely impact the residents of Potomac Greens and other surrounding neighborhoods. For all these reasons, the Potomac Yards Metro stop is a bad deal for all and should not be pursued. The no build option is the wisest and the BRT negates the need for a Metro stop at that location. Thank you so much.

**Response:** Regarding minimization of construction impacts to the George Washington Memorial Parkway (GWMP) and Potomac Greens neighborhood:

The City of Alexandria on May 20, 2015 adopted Build Alternative B with Construction Access Option 2 (no access from the GWMP roadway) as the preferred alternative for the project, which will be carried forward in the Final EIS. Thus, no construction traffic will use the GWMP. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

The Draft EIS Section 3.24 Construction Impacts identifies potential impacts from project construction activities and describes proposed measures to minimize and mitigate impacts. Project development during the design phase will further define efforts to minimize construction impacts and, for unavoidable impacts, will define methods to restore resources to their prior condition.

Regarding construction traffic, further details of the mitigation measures will be developed during the final design phase of the project when details of the project components and the construction scenarios are finalized and a Transportation Management Plan (TMP) will be developed. The TMP will address construction activities related to the project as well as permanent station operations and will be prepared in coordination with VDOT, the City of Alexandria, and other agencies as applicable. (4-5-29, 4)

**(1-5-29-2-227, 1):** The impact analysis for those alternatives requiring construction staging near and access to GWMP is inadequate. As currently described the traffic analysis is limited to noting that "To minimize potential impacts from construction traffic, site access by construction vehicles could be strategically scheduled to minimize its occurrence and access times to the GWMP roadway would occur only during non-rush hours and traffic plans would be coordinated with and approved by the proper authorities." DEIS at 3-209. This is mere description of operational or construction constraints rather than an analysis of traffic impacts on the GWMP resulting from lane closure. The presentation of this analysis is jarringly dissimilar to the transit impact information on other aspects of the document concerning Metro use or Route 1 capacities when full build out of the area is achieved. Here, the impact to traffic on GWMP resulting from lane closures is not remote or speculative and counts of non-rush hour traffic and the effects of projected lane closures should be presented and the LOS described.

**Response:** Regarding construction traffic:

The Draft EIS, Section 3.24, Construction Impacts, describes potential impacts and identifies broad minimization and mitigation measures. All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision. Further details of the mitigation measures will be developed during the final design phase of the project when details of the project components and the construction scenarios are finalized and a Transportation Management Plan (TMP) will be developed. The TMP will address construction activities related to the project as well as permanent station operations and will be prepared in coordination with VDOT, the City of Alexandria, and other agencies as applicable.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Thus, no construction traffic will use the GWMP.

Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-5-29, 1)

**(1-5-29-2-173, 1):** The George Washington Memorial Parkway (GWMP) is how those of us who live south of the City of Alexandria drive to work in the District in Columbia. For the most part, it is a relaxing commute. However, there are a lot of folks coming from Maryland to work at Fort Belvoir as a result of BRAC. Thus, construction of the Potomac Yard Metrorail station should be aware that rush hour traffic is heavy in both directions. I am against construction access using the GWMP because 1) heavy duty trucks do not belong on the Parkway as they are too wide and 2) they will attract other trucks.

We live south of Alexandria Avenue (the stone bridge) and recall several accidents involving buses, as well as semi-trucks hitting the stone bridge. We do not need more trucks thinking that it is okay to travel on the parkway. The parkway is too narrow for the motor coaches that travel to Mount Vernon. In fact, the side of my car was hit by a motor coach then I was crossing the creek separating the City of Alexandria and Fairfax County as the wind pushed the bus into my car.

Second, Alternative A is the best solution. During the thirty years that we have lived here, no access off the GWMP has been granted and for good reason. While I understand that the City of Alexandria wants to develop the most that they can, I do not believe that the peace and tranquility of the GWMP experience should be denigrated so that the City of Alexandria can develop more. There is a very good reason for the GWMP land holdings as it provides visitors to Mount Vernon a journey that is close to what it was when George Washington road the farms. As soon as one chink is found in the GWMP scenic easement, it will be gone. Please protect the GWMP National Park for our children.

**(1-5-29-2-72, 1):** In addition, no commercial vehicles are presently allowed on the Parkway without a special exception granted by the Superintendent of the National Park Service, so will Alexandria seek an exemption to allow trucks and construction equipment to operate on that already congested Parkway? If this dispensation is given by the National Park Service, what additional construction impact will occur to the parklands, especially to the demolition of numerous 20 to 70 year old majestic trees? Unfortunately, alternative haul routes would adversely impact the residents of Potomac Greens and other surrounding neighborhoods.

**Response:** Regarding the effects of commercial vehicles on the GWMP:

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Thus, no construction traffic will use the GWMP.

Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

Regarding construction traffic on other roadways, further details of the mitigation measures will be developed during the final design phase of the project when details of the project components and the construction scenarios are finalized and a Transportation Management Plan (TMP) will be developed. The TMP will address construction activities related to the project as well as permanent station operations and will be prepared in coordination with VDOT, the City of Alexandria, and other agencies as applicable. (1-5-7, 4)

**(2-5-29-2-170, 1):** The DEIS states that discussions are ongoing regarding the location of construction staging areas and have yet to be resolved and that more detail on construction staging would become available as discussions with property owners continue through the Final EIS and through final engineering design prior to construction. The DEIS also identifies the GWMP as a potential route to access construction staging areas. NCP staff defers to the NPS on this issue and to identify potential mitigation should access to construction staging areas from the GWMP be granted by the NPS.

**Response:** Regarding construction staging and traffic:

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Thus, no construction traffic will use the GWMP. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

Regarding construction traffic on other roadways, further details of the mitigation measures will be developed during the final design phase of the project when details of the project components and the construction scenarios are finalized and a Transportation Management Plan (TMP) will be developed. The TMP will address construction activities related to the project as well as permanent station operations and will be prepared in coordination with VDOT, the City of Alexandria, and other agencies as applicable.

The Draft EIS, Section 3.24, Construction Impacts, describes potential impacts and identifies broad minimization and mitigation measures. All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision. Further details of the locations of construction staging areas and mitigation measures will be developed during the final design phase of the project when details of the project components and the construction scenarios are finalized. (2-5-29, 1)

**(1-5-29-8-124, 1):** With all the construction, how will it effect your homes settling?

**Response:** For construction of the preferred alternative, Build Alternative B, significant excavation activities with the potential to affect adjacent building foundations are not likely to occur near residences. Plans for construction excavation activities and measures to prevent settling impacts to adjacent structures will be confirmed during the final design phase of the project when details of the project components and the construction scenarios are finalized. (1-5-29, 3)

**(1-5-29-2-26, 1):** The DEIS only briefly mentions that shutdowns of service on the Blue/Yellow lines between Braddock Road and National airport would be necessary for the construction of the Potomac Yard station (see p. 3-8 and p. 3-208). But the EIS does not elaborate as to how often and how lengthy these closures would be, nor does it indicate whether certain alternatives would require more and/or longer closures than others. (The February 2013 Construction Impacts Technical Memorandum, at p. 5, implied that Alternative B would be the least disruptive – but without details, and the B-CSX Design Option was not separately addressed.) Given the potential impact of such closures on Metrorail riders and Alexandria as a whole, this appears to be a matter that should have been addressed in the DEIS, and must be more specifically elaborated upon as the process moves forward.

**Response:** Regarding disruptions of service along the Metrorail Blue and Yellow Lines: The Draft EIS, Section 3.24, Construction Impacts, subsection 3.24.3.2, page 3-208, discusses effects of the project construction on Metrorail operations. More details regarding the frequency, duration, and type of service outages will be confirmed during the final design phase of the project when the details of the project components and construction scenarios are finalized. (1-2-8, 2)

**(3-5-29-2-161, 32):** Page 3-200 discusses vegetation being cleared and land being filled for staging areas. Impacts to WOUS should be avoided and minimized to the maximum extent practicable. It may be necessary to collect baseline information for aquatic areas to ensure that areas are restored to pre-construction condition.

**(3-5-29-2-161, 34):** It is recommended that activities associated with the Metrorail station are coordinated with construction activities of other projects in adjacent and nearby locations to avoid or minimize cumulative impacts to communities.

**(3-5-29-2-161, 1):** EPA supports evaluation and incorporation, as part of the build alternatives, design that can potentially reduce environmental impacts such as pervious surface, low impact development Best Management Practices (BMPs) for all aspects of the project, and low emissions equipment use during construction.

**Response:** For the Preferred Alternative, impacts to WOUS will be avoided to the maximum extent practicable and baseline information will be collected in accordance with USACE and NPS requirements. Construction activities will be coordinated with those of other nearby projects to avoid or minimize cumulative impacts.

Any clearing of vegetation on GWMP property would require a permit from NPS. Soils in impacted areas would be restored and the areas would be planted and seeded to restore them to a vegetated condition following the completion of construction activities. NPS parklands used for construction activities would be restored based on an NPS-approved planting plan.

The Draft EIS, Section 3.19, Sustainability, states that the Build Alternatives will be designed consistent with the local sustainability requirements. Station design features that comply with green building policies and objectives, such as LEED Silver Certification, would be developed during detailed design phases of the project. Project construction activities will consider the use of low-emission construction equipment where feasible. (3-5-29, 1)

**(3-5-29-2-161, 36):** Consider whether a noise technician/acoustical engineer is needed during peak construction phases.

**(3-5-29-2-161, 37):** Consider restricting the use of certain types of equipment during noise/vibration-sensitive hours. Consider restricting night work.

**(3-5-29-2-161, 38):** Consider whether temporary relocations of noise/vibration-sensitive receptors are an option or whether relocations are necessary.

**(3-5-29-2-161, 39):** Where practicable, EPA suggests that individual project construction activities are scheduled to avoid or minimize adverse impacts. Consider using noise barriers, including temporary barriers, semi-permanent barriers, noise curtains, and/or noise tents. Consider using vibration reducing techniques or mitigation measures.

**Response:** The Draft EIS, Section 3.24.3.2, addresses construction-related impacts and assesses impacts related to noise and vibration (pgs. 3-220 & 3-221). Based on the types of construction activities, the need for a noise technician/acoustical engineer on site during construction is not anticipated. Construction activities will be conducted in accordance with the City of Alexandria Noise Control Code, which permits some nighttime construction activities. Due to the nature of the construction along live Metrorail tracks, some nighttime construction activities will be required. As the project will meet local noise control ordinances, no temporary relocations of noise- or vibration-sensitive receptors are anticipated. The project construction activities will consider using noise and vibration control measures, as stated in the Draft EIS. Specific measures could include use of alternative equipment to reduce noise and vibration, operating high noise and vibration sources as far away from sensitive receptors as possible, public notification programs to alert residents in advance of particularly disruptive activities, and complaint resolution procedures. No pile driving is anticipated, which will help minimize any vibration impacts.

At this stage of project design, further details regarding the levels, duration, and frequency of construction-related noise, vibration, and fugitive dusts are not available. Project development during the design phase will further define efforts to minimize construction impacts and, for unavoidable impacts, will define methods to mitigate impacts and restore resources to their prior condition. (3-5-29, 2)

**(3-5-29-2-161, 42):** Clearly state the anticipated construction time periods for each build alternative.

**(3-5-29-2-161, 43):** The EIS should indicate the duration of construction. Depending upon the timeframe, some impacts that are presented as temporary may be permanent.

**Response:** The Final EIS construction impacts section will more clearly indicate the anticipated duration of construction. The project team will work with agencies that have jurisdiction over resources to determine if construction impacts are classified as temporary or permanent. (3-5-29, 3).

**(4-5-29-2-153, 1):** On-time performance is extremely high with approximately 95 percent of trains arriving at their final destination within five minutes of their scheduled arrival time. This is very important to VRE riders who have identified it in customer surveys as a top factor influencing their decision to travel on VRE.

Any actions that have the potential to degrade VRE operations are troubling. I am writing to share VRE concerns regarding the Potomac Yard Metrorail station alternatives considered in the DEIS. We believe the Alternative B-CSX Design Option would have a substantial negative effect on VRE commuter rail operations due to the impact of construction activities within and adjacent to the CSXT right-of-way. Combined with similar negative impacts to Amtrak intercity trains, which also use the CSXT right-of-way, and freight traffic, the effect on railroad operations will be significant.

The Draft EIS indicates the realigned CSXT tracks would be constructed first and railroad traffic shifted to the new alignment. Once the CSXT track work is complete, construction of the Metrorail station would begin; the total construction period is estimated to be two years. Primary access to the construction area is from the western side of the CSXT right-of-way across the active CSXT tracks. Although the DEIS indicates B-CSX Design Option will require "extensive preplanned outages on CSXT track", it fails to evaluate the effect of the outages on railroad operations or the potential for daily, unplanned stoppages of train traffic to allow construction workers, vehicles and equipment to cross the CSXT right-of-way to access the Metrorail station construction site or the potential for the imposition of slow orders for trains operating within the CSXT right-of-way for the duration of the construction period.

The uncertainty of the types and levels of potential construction impacts associated with the B-CSX Design Option and the lack of detailed evaluation of those impacts on railroad operations are serious concerns for VRE. This segment of track is used by all VRE trains and any activities that affect travel in the rail corridor can have a devastating effect on VRE operations. Queuing of trains through the construction site would become commonplace for the duration of construction due to slow orders and/or temporary shutdowns of the railroad. Given the volume of rail traffic in the corridor, the effect of a single delay or stoppage is magnified and can have a cascading effect as one train after another is slowed. This will significantly degrade VRE on-time performance and customer satisfaction and ultimately reduce VRE ridership. VRE riders would likely revert to using single occupancy vehicles, since few long-distance transit alternatives exist, resulting in increased traffic congestion and worsening of air quality in the region.

As an illustration of the effect railroad construction can have, extensive CSXT and Norfolk Southern track work in 2005 and 2006 had a significant, negative effect on VRE on-time performance. VRE on-time performance dropped to a low of 50%.

**Response:** Regarding potential effects on VRE, Amtrak, and CSXT rail service during project construction: As a result of the City of Alexandria's adoption of Build Alternative B as the preferred alternative for the project on May 20, 2015, neither B-CSX Design Option nor Build Alternative D will be advanced further. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

Construction activities for the preferred alternative will be scheduled and coordinated with CSXT, Amtrak, and Virginia Railway Express to avoid or minimize impacts to operations of freight, commuter, and passenger rail services along the CSXT line. (4-2-50, 1)

**(4-5-29-2-191, 1): ENVIRONMENTAL IMPACTS AND MITIGATION**

11. Pollution Prevention. The Draft EIS does not appear to discuss pollution prevention as such; however, the practices and citations of authority in the discussion of sustainability appear to include concepts of pollution prevention (sections 3.20.3 and 3.20.4, pages 3-190 to 3-191).

11(a) Agency Jurisdiction. DEQ's Office of Pollution Prevention hosts programs that serve as conduits for non-regulatory assistance to businesses, institutions, and communities. Pollution Prevention staff develop voluntary programs targeted to specific sectors or issues to appeal to particular needs. These programs create opportunities for assistance, rewards, and public recognition along with environmental improvements.

11(b) Recommendations. DEQ advocates that principles of pollution prevention be used in all construction projects as well as in facility operations. Effective planning and on-site Best Management Practices (BMPs) will help to ensure that environmental impacts are minimized. However, pollution prevention also includes decisions related to construction materials, design, and operational procedures that will facilitate the reduction of wastes at the source. We have several pollution prevention recommendations that may be helpful for this project:

- 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.
- Include specifications regarding raw materials and construction practices in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure and building construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.
- Integrate pollution prevention techniques into property construction and maintenance.

DEQ's Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques. See "Regulatory and Coordination Needs," item 10, below.

**Response:** Further detail regarding these project elements will be developed and presented in the Final EIS and/or later design phases and provided to agencies and stakeholders, as appropriate. (3-5-29, 2

**(4-5-29-2-213, 1): Comments: Impacts to VDOT facilities:**

As described in the Draft EIS, the proposed Potomac Yard Metrorail Station is planned as an urban station without Park & Ride facilities and off-street Kiss & Ride facilities, and the three Build Alternatives and B-CSX Design Option are expected to generate low levels of vehicular trips similar to other urban stations, with most users accessing the station by walking, bicycle, or bus. The three Build Alternatives and B-CSX Design Option would have no effect on overall intersection LOS in the study area when compared with the No Build option [1]. Primary access would be via non-motorized and local bus modes. Moreover no additional bus service or route modifications are planning [2], so incremental impacts on US Route 1 would appear to be minimal.

Given this situation, the greatest potential impact on US 1 would appear to occur during the construction phase of the project. The EIS describes several alternate construction scenarios for the various station alternatives. These involve the possible use of the George Washington Memorial Parkway (GWMP) and / or the use of existing local streets in the city of Alexandria. One such street is Potomac Avenue, which is located west of the existing rail line and thus connects with Route 1. We recommend that potential construction impacts be addressed during the Transportation Management Plan (TMP) development for the project.

Please contact Valerie Pardo (Valerie.Pardo @VDOT.Virginia.gov) if any further information is needed.

**Response:** The Transportation Management Plan (TMP) for the project will be developed during future design phases. The TMP will address construction activities related to the project as well as permanent station operations and will be prepared in coordination with VDOT, the City of Alexandria, and other agencies as applicable. (4-5-29, 3)

#### **(4-5-29-2-190, 1): ENVIRONMENTAL IMPACTS AND MITIGATION**

10. Roads and Vehicle Traffic. (See item 9, above.)

10(a) Agency Jurisdiction. The Virginia Department of Transportation (VDOT) is responsible for building, maintaining, and operating the state's roads, bridges, and tunnels.

10(b) Vehicular Traffic Impacts. VDOT notes that as described in the Draft EIS, the proposed Potomac Yard Metrorail Station will be an urban station without "Park and Ride" facilities or off-street "Kiss and Ride" facilities. The three "Build Alternatives" and the B-CSX Design Option would have no effect on intersection Levels of Service in the study area when compared with the "No-build" condition.

10(c) Station Access. Primary access would be by non-motorized and local bus modes. Moreover, no additional bus service or route modification is planned, so incremental impacts on U.S. Route 1 would appear to be minimal.

10(d) Route 1 Impacts. The greatest potential impact on Route 1 would appear to take place during construction of the project. The construction scenarios described in the EIS involve possible use of the George Washington Memorial Parkway and/or the use of local streets in Alexandria. One such street is Potomac Avenue, located west of the existing rail line and connecting with Route 1.

10(e) Recommendation. VDOT recommends that potential construction impacts be addressed during development of the Transportation Management Plan for the project. See "Regulatory and Coordination Needs," item 9, below.

**Response:** Regarding roads and vehicle traffic, the project will address any potential construction impacts in detail during the development of the Transportation Management Plan as requested. (4-5-29, 1)

#### **5.5.5.11 Contaminated Materials**

**(3-5-66-2-161, 30):** Page 2-34 discusses possible contaminated soil at the site while other sections indicate there is no contamination concern (i.e. page 3-7). This should be clarified. Page 3-190 should include additional information on the sampling and handling of potentially contaminated materials.

**Response:** The Section 2.5 Evaluation of Alternatives discussion of the potential to encounter contaminated soils will be clarified in the Final EIS by adding a statement that the "Alternatives would not result in long-term or permanent adverse effects due to risk mitigation and engineering controls and measures that would be used during construction," consistent with Section 3.20, Hazardous and Contaminated Materials, page 3-190 of the Draft EIS. Additional information regarding sampling of materials will be provided in the Final EIS, including the results of a Phase II Environmental Site Assessment for the area of the preferred alternative. Additional information regarding handling of contaminated materials is provided in Section 3.24 Construction Impacts (pages 3-226 to 3-227 of the Draft EIS) and will be more clearly referenced in Section 3.20. Further detail regarding these project elements will be developed and presented in the Final EIS and/or later design phases and provided to agencies and stakeholders, as appropriate. (3-5-66, 1)

**(4-5-46-2-184, 1): ENVIRONMENTAL IMPACTS AND MITIGATION**

4. Solid and Hazardous Waste Management. The Draft EIS discusses hazardous waste management, including impacts and mitigation, in section 3.20 (see pages 3-190 to 30-191, sections 3.20.3 and 3.20.4).

4(a) Agency Jurisdiction. Solid and hazardous wastes in Virginia are regulated by the Virginia Department of Environmental Quality, the Virginia Waste Management Board (VWMB) and the U.S. Environmental Protection Agency. These agencies administer programs mandated 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 VWMB 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 Planning 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) Findings. The Draft EIS indicated a search of solid and hazardous waste databases was performed in the project area. Staff of DEQ's Division of Land Protection and Revitalization (DEQ-DLPR) conducted a cursory review of its database files under zip code 22314, including a GIS database search, and found the information which follows.

4(b)(i) RCRA (Resource Conservation and Recovery Act)/Hazardous Waste Facilities. DEQ-DLPR staff identified 96 sites in the zip code, with no sites in close proximity to the project site. (See <http://www.epa.gov/enviro/facts/rcrainfo/search.html>.)

4(b)(ii) CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act [Superfund]) Sites. DEQ-DLPR staff identified 1 site in the zip code, which was not in close proximity to the project site. (see <http://www.epa.gov/superfund/sites/cursites/index.html>.)

4(b)(iii) FUD (Formerly Used Defense) Sites. None were found by DEQ-DLPR staff. (Note: for the next three site categories, see [http://www.deq.virginia.gov/mapper\\_ext/default.aspx?service=public/wimby](http://www.deq.virginia.gov/mapper_ext/default.aspx?service=public/wimby).)

4(b)(iv) Solid Waste Facilities. None were found by DEQ-DLPR staff.

4(b)(v) VRP (Voluntary Remediation Program) Sites. None were found by DEQ-DLPR staff.

4(b)(vi) Petroleum Release Sites. None were found to be in close proximity to the project site by DEQ-DLPR staff. See item 4(c), next, for guidance on examining petroleum release records.

4(c) Petroleum Release Records. Please note that the DEQ's petroleum contamination (PC) case files may identify petroleum releases that should be evaluated by the project engineer or manager to establish the following:

- exact location of the release;
- the nature and extent of the petroleum release;
- the potential of the release to affect the proposed project.

The project facility representative should contact DEQ's Northern Regional Office in this regard. See "Regulatory and Coordination Needs," item 4(a)(i), below.

4(d) General Comments.

4(d)(i) Soil, Sediment, and Waste Management. Any soil that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations (see "Regulatory and Coordination Needs," item 4(b), below).

4(d)(ii) Asbestos and/or Lead-based Paint. All structures being demolished, renovated, or removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, additional state regulations apply. Again, see "Regulatory and Coordination Needs," item 4(b), below.

4(d)(iii) Pollution Prevention. DEQ encourages all project proponents to follow pollution prevention principles, including the reduction of materials at the source, re-use of materials, and recycling of solid wastes. See also item 11, below.

**Response:** Regarding solid and hazardous waste management: Information in comment is noted. The Final EIS will address any additional requirements or permits required for the removal of hazardous materials. The project team will coordinate with Virginia DEQ if more information on hazardous waste management is required. (4-5-46, 1)

#### **(4-5-46-2-195, 1): REGULATORY AND COORDINATION NEEDS**

#### 4. Solid and Hazardous Waste Management.

##### 4(a) Coordination.

4(a)(i) Petroleum Contamination Information. As indicated above ("Environmental Impacts and Mitigation," item 4(c)), the facility representative for the project should contact DEQ's Northern Regional Office (telephone (703) 583-3800, and ask for "Tanks Program") for further information and the administrative records of the PC cases which are determined to be in close proximity to the proposed project.

4(a)(ii) Asbestos-containing Materials and Lead-Based Paint. Additional guidance on these topics is available from DEQ's Northern Regional Office (Kathryn Perszyk, telephone (703) 583-3856 or e-mail [Kathryn.perszyk@deg.virginia.gov](mailto:Kathryn.perszyk@deg.virginia.gov)).

4(a)(iii) General Questions. General questions about solid and hazardous waste management may be directed to DEQ's Division of Land Protection and Revitalization (Steve Coe, telephone (804) 698-4029 or e-mail [steve.coe@deq.virginia.gov](mailto:steve.coe@deq.virginia.gov)).

4(b) Authorities. Authorities for the activities of DEQ's Division of Land Protection and Revitalization and the waste management sections of DEQ's Regional Offices include, but are not limited to, the following:

##### Virginia:

- Virginia Waste Management Act, Virginia Code sections 10.1-1400 et seq.
- Virginia Solid Waste Management Regulations, 9 VAC 20-81
  - o (9 VAC 20-81-620 applies to asbestos-containing materials)
- Virginia Hazardous Waste Management Regulations, 9 VAC 20-60
  - o (9 VAC 20-60-261 applies to lead-based paint)
- Virginia Regulations for the Transportation of Hazardous Materials, 9 VAC 20- 110
- Virginia Code sections 62.1-44.34.8 through 62.1-44.34 .9 and Regulations, 9 VAC 25-580-10 et seq. on petroleum storage tank clean-ups
- Virginia Tank Regulations, 9 VAC 25-91-10 et seq. (AST)
- Virginia Tank Regulations, 9 VAC 25-580-10 t seq. (UST).

##### Federal:

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

**(4-5-46-2-207, 1):** The staff from the Division of Land Protection and Revitalization (DLPR) has completed its review of the Environmental Review Request Form and related documents for the Potomac Yards Metrorail Station Alexandria, VA 22314 [...]

The submittal addressed potential solid and/or hazardous waste issues, and indicated a search of solid and hazardous waste databases in the project area. The DLPR staff has conducted a cursory review of its database files under zip code 22314, including a GIS database search, resulting in the following information:

RCRA: Hazardous Waste Facilities- 96 sites were identified in the identified zip code, with no sites identified as in close proximity to the project site.

(See: <http://www.epa.gov/enviro/facts/rcrainfo/search.html>.)

CERCLA sites - 1 site was identified in zip code 22314, none in close proximity to the project site.

(See: <http://www.epa.gov/superfund/sites/cursites/index.htm>.)

FUDs Sites - none

For the next three site categories, see:

<http://www.deq.virginia.gov/mapper/ext/default.aspx?service=public/wimby>)

Solid Waste Facilities - none

VRP Sites - none

Petroleum Release Sites - none in close proximity to the project site

Please note that the DEQ's petroleum contamination (PC) case files may identify petroleum releases that should be evaluated by the project engineer or manager to establish the exact location of the release and the nature and extent of the petroleum release and the potential to impact the proposed project. The facility representative should contact the DEQ's Northern Virginia Regional Office at 703-583-3800 (Tank Program) for further information and the administrative records of the PC cases which are determined to be in close proximity to the proposed project.

## GENERAL COMMENTS

### Soil, Sediment, and Waste Management

Any soil that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 et seq.; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-81); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 et seq., and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous Materials, 49 CFR Part 107.

### Asbestos and/or Lead-based Paint

All structures being demolished/renovated/removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-81-620 for ACM and 9VAC 20-60-261 for LBP must be followed. For questions contact DEQ's Northern Virginia Regional Office, Kathryn Perszyk, at 703-583-3856.

#### Pollution Prevention - Reuse - Recycling

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

If you have any questions or need further information, please contact Steve Coe at (804) 698-4029.

**Response:** Regarding solid and hazardous waste management: Information in comment is noted. The project team will coordinate with Virginia DEQ if more information on hazardous waste management is required. (4-5-46, 2)

**(4-5-46-2-208, 1):** NRO comments regarding the Draft Environmental Impact Statement for FTA : Potomac Yards Metrorail Station located in the City of Alexandria are as follows:

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

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

Virginia Water Protection Permit (CVWPP) Program - Based on the information provided, it appears the project may impact streams or wetlands, and the project manager is reminded that a VWP permit from DEQ may be required should impacts to surface waters be necessary. DEQ VWP staff recommends that the avoidance and minimization of surface water impacts to the maximum extent practicable as well as coordination with the US Army Corps of Engineers. Upon receipt of a Joint Permit Application for the proposed surface water impacts, DEQ VWP Permit staff will review the proposed project in accordance with the VWP permit program regulations and current VWP permit program guidance.

-Water Permitting/VPDES Program: The project manager is reminded that prior to construction all the applicable VPDES, and/or construction storm water, should be obtained.

**Response:** Regarding solid or hazardous waste, air quality, and water resources permitting: Information in comment is noted. The Final EIS will address any additional requirements or permits required for the solid or hazardous waste, air quality, and water resources. The project team will coordinate with Virginia DEQ if more information on hazardous waste management is required. (4-5-46, 3)

### 5.5.5.12 Cultural Resources

**(4-5-12-2-156, 1):** In general, we concur with the statements made in the DEIS, however we are not ready to comment on effects to historic properties until a preferred alternative has been selected. It appears from the conclusions in the DEIS that Alternative A (Option 2) and Alternative B-CSX Design Option would have the least impacts to historic resources. Furthermore, once a preferred alternative is selected, we request that FTA resume consultation under Section 106 to finalize the identification of historic properties before moving on to assessing effects. Our last letter to FTA on June 27 2013, noted that eligibility still needed to be resolved on the Abingdon Apartments, and DHR outlined two options for FTA.

**(4-5-12-2-204, 1):** DHR has been in consultation with the Federal Transit Administration (FTA) regarding this project. We request that the FTA continue to consult directly with DHR, as necessary, pursuant to Section 106 of the National Historic Preservation Act (as amended) and its implementing regulations codified at 36 CFR Part 800 which require Federal agencies to consider the effects of their undertakings on historic properties.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Coordination between FTA and VDHR regarding the Section 106 review process will continue, and will include resolution of the eligibility status of the Abingdon Apartments in a manner consistent with previous VDHR recommendations.

Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (4-5-12, 1)

#### **(4-5-12-2-180, 1): ENVIRONMENTAL IMPACTS AND MITIGATION**

1. Historic Structures and Archaeological Resources. The Draft EIS discusses archaeological resources and historic structures, and the environmental consequences and mitigation measures for them, in section 3.9 (pages 3-128 through 3-146).

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

1(b) Comments. The Department of Historic Resources (OHR) has consulted with FTA regarding this project. OHR requests that the FTA continue this consultation as necessary, pursuant to section 106 of the NHPA and its implementing regulations codified at Title 36, Code of Federal Regulations, Part 800. The Regulations require federal agencies to consider the effects of their undertakings on historic properties. See "Regulatory and Coordination Needs," item 1, below.

#### **(4-5-12-2-192, 1): REGULATORY AND COORDINATION NEEDS**

1. Historic Structures and Archaeological Resources.

1(a) Coordination. As indicated above ("Environmental Impacts and Mitigation," item 1(b)), the Department of Historic Resources (OHR) requests that FTA continue consulting with that Department with regard to this project (begin with Andrea Kampinen, telephone (804) 462-6084 or e-mail [andrea.kampinen@dhr.virginia.gov](mailto:andrea.kampinen@dhr.virginia.gov)).

1(b) Authorities. Legal and regulatory authorities for DHR's activities and its role as the State Historic Preservation Office (SHPO) include, but are not limited to, the National Historic Preservation Act, as amended, specifically section 106, and the implementing regulations at Title 36, Code of Federal Regulations (CFR), Part 800.

**Response:** Review of the project under Section 106 of the National Historic Preservation Act has been ongoing and will continue to be coordinated between FTA and the Virginia Department of Historic Resources

**(1-5-12-1-249, 1):** Judy Lowe (ph) just insisted, so I was -- the other day I was up at the north end of King Street and I saw the hat sculpture that's finally getting covered with vines and realized that, you know, it was a long-term vision for that piece of art that you really had, and there were calls to get rid of it, in other words, don't stick with it, and it's actually turning --well, it's turning out pretty well and in some sense, we're talking about long-term visions here. For example, the Parkway is a long-term vision that is defended by the Park Service and others and, you know, it's important to honor that. And so when we design the station, it's very important that, I think, from the Parkway it looks like something that maybe existed in the 1800s. I don't know how you do that with a Metro Station but I think the design is going to be very, very important and you need to honor that, the reason for the Parkway.

North Potomac Yard, I was involved in the design and of the plan for that and it's, you know, mixed use, a lot of commercial, lot of office is part of the long-term vision. And so it is worrisome to hear that that potentially is being -- you know, might be degraded by, you know, recent developer concerns and such. And supporting that, I mean it was imperative that a Metro be built. Otherwise, there was a major difference in the amount of development that you could get.

**Response:** Regarding potential impacts to historic resources: The Draft EIS, Section 3.9 Cultural Resources describes potential impacts to historic resources, such as the George Washington Memorial Parkway. Section 106 of the National Historic Preservation Act requires the Federal Transit Administration (FTA) to consider the effects of its actions on historic properties. FTA is responsible for compliance with Section 106 and initiated the review process with the Virginia Department of Historic Resources (VDHR). In addition to seeking the views of VDHR, FTA has invited certain organizations and individuals who have a demonstrated interest in the project, such as the National Park Service, to participate in the process. These organizations and individuals are referred to as Section 106 consulting parties, and review information relevant to the identification, evaluation and assessment of effects to historic properties that could result from the project. FTA and VDHR work with each other and the consulting parties to resolve project-related adverse effects to historic properties through a Memorandum of Agreement (MOA). The Final EIS will include details on proposed mitigation measures to address impacts to historic resources. (1-2-12, 1)

**(1-5-12-2-228, 1):** The cumulative impacts to the cultural resources and adjacent National Register properties need to be better described. While the document contains an initial evaluation of impacts and a description in the technical memorandum dealing with such resources, it fails to adequately address cumulative impacts to cultural resources resulting from reasonably foreseeable developments in the area. There are a variety of projects proposed for development along the waterfront in Alexandria. These projects are in or adjacent to the Alexandria National Register Districts both for "Old Town" and for "Parker Grey" areas. While these may be outside of the APE for the immediate project, they will have effects on the area's cultural resources and need to be evaluated for purposes of NEPA and Section 106 of the NHPA. Cumulative effects to the historic and cultural resources of the APE area as well as GWMP, and adjacent National Register (and NHLs) need to be analyzed so that the full picture of impacts to these resources is considered.

Importantly, the document does not integrate mitigation measures that were the subject of a recent letter by the NPS to the City of Alexandria. These "mitigation measures" were apparently acceded to by the NPS as a result of political pressure by "two senators and a congressman" according to video and audio recordings of the meetings of the Potomac Yard Metrorail Implementation Work Group Meeting - Oct 23rd, 2014. Additionally, the measures were not contained within the material available on the official home page for the Potomac Yard Metrorail Station EIS and reviewers of both the EIS and the 4(f) document do not have the necessary information available to adequately evaluate impacts. Because these mitigation measures are not integrated within the alternatives their effects on the human environment are not adequately presented to the public or to decisionmakers.

Substantively, the potential mitigation measures appear to be a grab bag of potential actions that may or may not be related to impacts associated with the proposal; are not a feature or function of the design of the new Metro facility; do not include adaptive management considerations; and do not comply with the guidance of the Council on Environmental Quality concerning mitigation measures.

The costs associated with implementing the mitigation measures need to be presented in a supplemental document along with the appropriate analysis of impacts resulting from the incorporation of the mitigation measures. Without costs being associated with the measures it is impossible to evaluate when the upper threshold of \$12 million dollars, as set by the City of Alexandria, will be reached. Will the costs limit the implementation of mitigation measures to one item or will all of the items be implemented and what effect will that have on impacts resulting from implementation of the build alternative. This is substantial new information bearing on the proposed alternatives and environmental concerns. As a result, under the provisions of NEPA and the implementing regulations, these changes must be disclosed and the effects analyzed in a supplemental EIS.

**Response:** Section 3.23.1.2 of the Draft EIS defined the area of cumulative effects as the project study area. FTA determined the appropriate geographic bounds for consideration of reasonably foreseeable and past actions for the purpose of assessing cumulative effects. As such, potential indirect and cumulative effects within this area were taken into consideration for its effect determinations. In addition, the Virginia Department of Historic Resources (VDHR) concurred with the Area of Potential Effects (APE) for historic architecture and archaeology in July 2012. The APE is located within the project study area. The Old Town Alexandria and Park Grey Historic Districts are outside of the APE and the project study area. Thus, both historic districts are outside the analysis area for cumulative effects. The Potomac Yard Metrorail Station would not contribute to cumulative impacts to the Old Town and Parker Grey Historic Districts, as the additional growth and development occurring in Alexandria and the surrounding communities will happen in absence of the station.

The Final EIS, Section 4(f) Evaluation and Section 106 analysis will be updated to include the Net Benefit Agreement between the City of Alexandria and NPS, and any other mitigation agreements related to the project. Thus, changes in the proposed mitigation from the Draft EIS do not require a supplemental EIS based 23 CFR 771.129. (1-5-12, 1)

**(1-5-33-2-225, 11):** Additional information on the status of GWMP and the appropriate standards to apply should have been drawn from the National Register Nomination Form and existing information cited within the DEIS itself. As an example, the cultural landscape study The Mount Vernon Memorial Highway Cultural Landscape Inventory and Report from 1987 is cited as a planning document applicable to the project on page 3-33 of the DEIS along with other NPS applicable plans, but is not noted in the evaluation, thus creating a flaw in the evaluation of the alternatives. Page 3-33 also notes the Capper-Crampton Act and the fact that “GWMP/MVMH took obvious efforts to block undesired views of “rail transport” from the roadway, particularly in the area of Potomac Yard.”

**Response:** The Draft EIS, Section 3.9, Cultural Resources, evaluates potential impacts to the GWMP and other historic resources listed on or eligible for listing on the National Register based on their listing criteria. Page 3-124, Line 1866 of the Draft EIS notes the use of the 1987 Cultural Landscape Report for the Mount Vernon Memorial Highway in the evaluation. Page 3-126, Lines 1946-1954 and Page 3-127, Lines 1198-2000 of the Draft EIS describe the Capper Crampton Act and relevance to the historic properties. The National Register of Historic Places (NRHP) nominations are cited in Section 3.9, Page 3-126, Lines 1966-1981 of the Draft EIS, and are summarized in Table 3-22.

Additional information on relevant documents related to the cultural significance of the GWMP is included in the Preliminary Historic Architectural Report, which is found in Volume II of the Draft EIS. (1-5-33, 42)

### 5.5.5.13 Cumulative Impact

**(3-5-62-2-161, 24):** The EIS should include a thorough cumulative impact analysis for past, present and reasonably foreseeable projects occurring in the project areas. EPA suggests that a secondary and cumulative effects analysis begin with defining the geographic and temporal limits of the study; this is generally broader than the study area of the project. The document should address potential indirect and cumulative effects in the project areas, and analysis may aid in the identification of resources that are likely to be adversely affected by multiple projects, and sensitive resources that could require additional measures of protection. This includes an assessment of cumulative impacts to wetlands and other resources.

**(3-5-62-2-161, 27):** The discussion on page 3-198 refers the reader to section 3.15 for mitigation measures related to flooding and climate change. The discussion is vague. More information should be provided as to how the project will be designed to address any potential issues.

**Response:** FTA determined the appropriate geographic bounds for consideration of reasonably foreseeable and past actions for the purpose of assessing cumulative effects. As such, potential indirect and cumulative effects within this area were taken into consideration for its effect determinations. With regard to mitigation of flooding and sea level rise impacts to climate change, a commitment to incorporate resiliency measures for foreseeable cumulative climate change impacts, in particular flooding, will be added in the Final EIS, including elevation of structures above the 500-foot floodplain (3-5-62, 1)

#### 5.5.5.14 Demographics

**(1-2-54-1-80, 1):** Just last week, the Washington Post reported that the Washington area population increase is slowing down, according to census figures. Alexandria and Arlington have seen more people move out rather than move in. Have the decision-makers taken this into account in their assessment?

**Response:** The Draft EIS, Section 1.3 describes the Project Need and discusses regional and local population growth in Alexandria. The Metropolitan Washington Council of Governments (MWCOC) Round 8.1 Cooperative Forecast estimated that the population of Alexandria would grow by 35 percent over the next 30 years. This growth would result in increased vehicle miles traveled (VMT) and congestion; the transportation study conducted as part of the North Potomac Yard Small Area Plan (NPYSAP) indicated that traffic congestion would increase on U.S. Route 1 even without the proposed development in Potomac Yard. Increasing the share of transit trips would help to manage congestion, reduce auto trips and emissions along transit corridors, and make efficient use of existing infrastructure. (1-2-54, 1)

#### 5.5.5.15 Ecosystems and Endangered Species

**(3-5-63-2-161, 31):** The Page 3-182 discussion of Threatened and Endangered Species is confusing as presented. The appropriate state and federal agencies should be coordinated with regarding the potential for these species to be presented and documentation from those agencies should be provided in the EIS. Surveys should be conducted by appropriate personal and follow approved protocol.

**Response:** The Draft EIS, Section 3.18.1.2, describes coordination with state and federal agencies. Page 3-182 of the Draft EIS discusses coordination with U.S. Fish and Wildlife Service (USFWS) and Virginia Department of Conservation and Recreation (VDCR), and Virginia Department of Game and Inland Fisheries (VDGIF). Threatened and endangered species were identified by using USFWS Information for Planning and Conservation (IPaC) online database system. Table 3-40 of the Draft EIS summarizes the Federally listed and state listed species that have the potential to occur within the study area. The analysis is described in more detail in the *Ecosystems and Endangered Species Technical Memorandum* in Volume II of the Draft EIS.

Following listing of the Northern Long-Eared Bat in April 2015, FTA received direction from USFWS that the agency does not consider suitable habitat for the bat to be present in the City of Alexandria and to resubmit the IPaC list request for the project area that will confirm this. As of July 17, 2015, the IPaC Official Species List for the project area reported zero federally listed threatened or endangered species and no critical habitats. On September 3, 2015, USFWS issued its Online Project Certification Letter stating that:

*“This letter, and the enclosed project review package, completes the review of your project in accordance with the Endangered Species Act of 1973 (16 U.S.C. 1531-1544, 87 Stat. 884), as amended (ESA), and the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c, 54 Stat. 250), as amended (Eagle Act). This letter also provides information for your project review under the National Environmental Policy Act of 1969 (P.L. 91-190, 42 U.S.C. 4321-4347, 83 Stat. 852), as amended... Additional coordination with this office is not needed.”*

As instructed by USFWS, the IPaC search will be run every 90 days until the project is complete. FTA will fulfill its responsibilities under Section 7 of the Endangered Species Act, and the Final EIS will include documentation of further agency coordination. (3-5-63, 2)

**(3-5-63-2-161, 45):** The DEIS should comply with Executive Order 13112 regarding invasive species.

**Response:** The Final EIS will clarify that the project will comply with Executive Order 13112. As described in the Draft EIS, Section 3.18.4, the development and implementation of an Invasive Species Management Plan, which addresses the removal and management of invasive species, is proposed. The Plan will address restoration of vegetation cleared during construction and installation of permanent plantings used in landscaping and screening the station site, including, for example, ensuring that restoration plantings and seed mixes consist of native stock and are free and clear of invasive or noxious weeds. Further details regarding the Invasive Species Management Plan will be developed in compliance with EO 13112 and presented in the Final EIS and Record of Decision. (3-5-63, 1)

#### 5.5.5.16 Environmental Justice

**(3-5-64-2-161, 21):** It would be helpful to have included all of the demographic information for the study area by census block group in the data used to identify areas of EJ concern. Having that accompanying information would help give more meaning to Figure 3-10.

**Response:** Additional details on the methodology used in the environmental justice analysis are included in the *Neighborhoods and Environmental Justice Technical Memorandum* in Volume II of the Draft EIS. The Final EIS will provide additional detail regarding the demographic information used to identify EJ communities. (3-5-64, 3)

**(3-5-64-2-161, 22):** Greater detail should be provided as to the potential exposure of at-risk populations to toxic substances, noise, vibration, fugitive dusts, truck traffic, and other activities that may be a result of the activities of this project.

**Response:** As described in the Draft EIS, Section 3.7.3.3, potential impacts related to these activities would not adversely or disproportionately affect the identified environmental justice populations, as these impacts would be primarily borne by the communities that are immediately adjacent to the proposed Metrorail station and its construction staging areas and access routes, which are not minority or low-income communities.

Section 3.24 of the Draft EIS describes construction impacts for the Build Alternatives for these impact sources, as follows:

Toxic Substances (Lines 5133-5139) – Recognized Environmental Conditions sites (RECs) are most likely to be encountered during construction activities. Temporary measures taken during construction, such as construction worker health and safety practices, management of excavated contaminated soil, and construction dewatering management and permitting would be implemented during construction to prevent exposure to potential contaminants at RECs.

Noise and Vibration (Lines 4918-4942) – The bulk of the construction would normally occur during daylight hours when most residents are not at home, when residents who are at home are less sensitive to construction activities, and when other community noise sources contribute to higher ambient noise levels. However, some construction activities would also occur during the nighttime and on weekends to complete the project sooner and reduce the overall duration of impact on the community. Whenever possible, construction activities would be conducted during the daytime and during weekdays and would be conducted in the City of Alexandria's Noise Control Code. Construction activities are expected to impact only the closest residences and park users in adjacent neighborhoods (Potomac Greens and Potomac Yard) and any commercial properties in the vicinity of the station construction and Metrorail track realignment. Similarly, the three Build Alternatives and B-CSX Design Option would have the potential for noise increases along detour routes and truck haul routes. This analysis made conservative assumptions regarding construction noise in order to ensure that potential maximum adverse impacts are analyzed and disclosed consistent with NEPA requirements.

**Fugitive Dusts (Lines 4094-4917)** – Potential air quality impacts from construction of the three Build Alternatives and B-CSX Design Option would be similar and would include fugitive dust emissions resulting from demolition, ground excavation, material handling and storage, movement of equipment at the site, and transport of material to and from the site. These impacts would be temporary, and would affect only the immediate vicinity of the construction sites and their access routes. For each of the three Build Alternatives or B-CSX Design Option, to minimize construction-related effects on air quality, project construction activities would comply with Virginia Department of Environmental Quality (VDEQ) requirements for fugitive dust and emissions, as well as any local regulations.

**Truck Traffic (4420-4534)** – The roadway operations of Potomac Avenue, Potomac Greens Drive, Slaters Lane, U.S. Route 1, and the WMATA traction power substation access road would be affected during construction. Temporary lane closures would be required on public roads that have more than two lanes. Flagmen would be used on smaller two-lane roads to direct vehicle movements and allow construction vehicles to access the building sites. During construction, the number of vehicles accessing the site would vary daily. For the Build Alternatives, the number of vehicles on each access route would fluctuate depending on the activities associated with construction and time of day. At this early stage of project design, proposed construction techniques, types of equipment, and precise locations and durations of different activities within the project construction areas have not yet been defined sufficiently to quantitatively assess and compare the potential traffic effects. To minimize potential impacts from construction traffic, site access by construction vehicles could be strategically scheduled to minimize its occurrence. When construction is complete, any road infrastructure damaged by construction activity would be restored to its former condition.

As described in Section 3.24, Construction Impacts, best management practices will be used to avoid exposure to toxic substances (Lines 5139-5145) and safety risks due to truck traffic (Lines 4420-4458) and to minimize noise and vibration (Section 3.24.4.1), and fugitive dusts (Lines 4915-4917) that could affect residents, including at-risk populations, within the neighborhoods adjacent to the construction activities.

All mitigation measures for the Preferred Alternative will be specified in the Final EIS. At this stage of project design, further details regarding the levels, duration, and frequency of construction-related noise, vibration, and fugitive dusts are not available. Project development during the design phase will further define efforts to minimize construction impacts and, for unavoidable impacts, will define methods to mitigate impacts and restore resources to their prior condition. (3-5-64, 1)

**(3-5-64-2-161, 40):** The analysis used to identify minority populations does not seem to reflect the intent of the Council on Environmental Quality, Environmental Justice - Guidance under the National Environmental Policy Act, December 10, 1997. The guidance states: "Minority populations should be identified where either: (a) the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis. In identifying minority communities, agencies may consider as a community either a group of individuals living in geographic proximity to one another, or a geographically dispersed/transient set of individuals (such as migrant workers or Native American), where either type of group experiences common conditions of environmental exposure or effect. The selection of the appropriate unit of geographic analysis may be a governing body's jurisdiction, a neighborhood, census tract, or other similar unit that is to be chosen so as to not artificially dilute or inflate the affected minority population. A minority population also exists if there is more than one minority group present and the minority percentage, as calculated by aggregating all minority persons, meets one of the above-stated thresholds."

A population exceeding the 50% threshold is a minority community. So any population that is more than 50% minority is by definition a minority population.

Figure 3-10: Minority Populations, uses a benchmark value of 58.1 % minority in its identification of at risk populations. The benchmark exceeds the CEQ value of 50%. What is the justification for this value? The WMATA minority percentage of 58.1 percent should not be used as the benchmark, 50% should be that benchmark.

**(3-5-64-2-161, 41):** Figure 3-10 should be revised using 50% or some other more protective benchmark to identify areas of potential EJ concern.

**Response:** The environmental justice analysis, including how minority communities are identified, follows FTA guidance (FTA Circular, 2012), which incorporates CEQ's guidance on environmental justice. FTA's guidance on environmental justice is not wholly reliant on the meaningfully greater threshold set forth by CEQ, and, as such, FTA encourages alternative means beyond the meaningfully greater threshold for identifying environmental justice populations and potential disproportionate adverse impacts. The environmental justice analysis took into consideration the meaningfully greater threshold and outreach conducted to identify other possible environmental justice populations that may have been omitted from a simple census tract or block search. Based on the analysis and the very limited area for potential direct and indirect effects, there is no potential for disproportionate adverse impacts on environmental justice populations. Thus, the suggested benchmarks used will not be revised for the Final EIS. (3-5-64, 2)

### 5.5.5.17 Financial Resources

**(1-5-9-8-104, 1):** Move Metro closer to Arlington land

Get money from Arlington!

**(1-5-9-2-20, 1):** It is still not clear how this station will be paid for. I don't believe the cost estimates. I would like to see a comparison of cost estimates for all projects of 1 million or more done by the city of Alexandria compared to the actual final costs. Has any project ever come within the original cost estimates? Be realistic - and indicate the true cost - by increasing the estimate by the average percentage of cost overruns of big projects completed over the last 10 years. A loan from the state will still need to be paid back - plus - I see the development as adding more expenses to the city in terms of infrastructure upkeep and more children to educate. Our taxes are too high already.

**(1-2-9-1-78, 1):** And not only that, the report does not include the 28 -- the \$14 million that will be lost from the revenue that is currently generated from the sales taxes over at the Potomac Yard Shopping Center [...] so Option B would actually cost \$28 million a year to maintain.

**(1-5-9-1-83, 1):** How does this new asset factor into the long-term maintenance and funding for a station when Metro is faced with over 10,000 in maintenance backlog, the need to enhance an improve safety within the system; the second phase of the silver line Metro extension being 13 months behind schedule, and not expected to begin service until 2020; and Phase 1 of the silver line, now pegged at \$2.9 billion and continued replacement of older Metro cars with a new 7000 series? [...] Also, what is the yearly tax revenue that the city receives from the shopping center and the movie theatre? What will the city do to make up for that lost revenue when the shopping center disappears? [...] And on my personal view, it's either that or else, please put the monies into a more efficient bus system that's already available, which if it needed changes with the development of that area, would be much easier to change.

**(4-5-9-1-189, 1):** 9(d) DRPT Funding. In FY15, DRPT provided \$170,000 in state funding to the City of Alexandria for the preparation of a bid package for the Potomac Yard Metro station and \$6.39 million in state and federal funding to VRE for track lease payments to CSX. In the current draft of the Six-Year Improvement Program (SYIP), DRPT anticipates providing \$8.86 million in state and federal funding to VRE for the CSX track lease. Neither NVTC nor the City of Alexandria has requested DRPT funding for the Potomac Yard Metrorail station; however, the project is included in DRPT's FY15-20 SYIP for an estimated \$306 million total cost in FY17. [...]

9(e) Purpose and Need Analysis. [...] Additionally the Potomac Yard Metrorail station will be good for the economies of Alexandria, Northern Virginia, and the entire Commonwealth of Virginia. Investment in transit promotes economic development. According to the American Public Transit Association, \$1 in spending on transit returns \$4 in economic benefit and every \$1 billion spent on transit capital supports 16,000 jobs. Based on the DRPT SYIP costs, this project would generate 4,900 jobs and \$1.2 billion in economic benefit. The City's own economic impact analysis shows that the station will generate as much as \$2 billion in additional tax revenues which can support additional services and benefit residents above the cost of constructing the station.

In January 2015, the Commonwealth Transportation Board approved a \$50 million loan from the Virginia Transportation Infrastructure Bank to the project. The project is estimated to generate between 9.3 million and 13.1 million square feet of development and anticipates receiving donated property for the station from developers as well as developer contributions and shortfall guarantees. [...]

9(f) Funding Plans. DRPT also agrees with the statement in the DEIS that the project is financially feasible. In addition to the DRPT SYIP, the project is included in the Metropolitan Washington Council of Government's 2040 Constrained Long-Range Plan (CLRP) and the Northern Virginia Transportation Authority's (NVT A) 2040 TransAction plan. The environmental work was funded in NVT A's 2014 program, and the project has been submitted for project development funding and development of a design-build package in response to NVT A's 2015-16 call for the project.

**(4-5-9-6-244, 1):** The City has stated repeatedly that the Potomac Yard Metro project will result in no cost to the City General Fund and that the funding will come from the developer contributions, grants from regional, state, and federal sources, special tax district revenues and new tax revenues generated from the overall development.

However, this hasn't been the case. Recently, Virginia has agreed to loan, not grant, Alexandria 50 million and developers will only contribute to the Metro if Alternative B is selected, which is beyond the pale. Unfortunately, the rest of these offsets are all too true. Residents and/or commercial interests located in two special tax zones within Potomac Yard will pay 10 to 20 percent more on their property taxes.

You know, if this Metro stop is so important to the economic welfare of this city, then everybody ought to chip in.

We do not condone the use of special tax zones. The City of Alexandria cannot continue to borrow, build, and hope, as so aptly described by my good friend, Bob Wood. This posture has put us half a billion dollars in debt, more to follow, with a \$66 million annual debt service starting next year.

Instead of the erstwhile zero sum game being tied up by the City for these Metro alternatives, it would be far more helpful to understand the exact funding requirements for each year, both Alternatives A and B, to include a detailed breakout of the funding services that will be used to satisfy each requirement. As an example, next fiscal year, Alexandria's contribution to WMATA is going to cost an additional \$3 million out of the General Fund resulting in a payment of 23 million. In future years, the proposed Metro stop will require additional subsidies for Metro so this must be factored in and will -- as will a loan from Virginia.

Rather than resorting to smoke and mirrors, total transparency is needed when discussing funding for this Metro stop and other developments, which is tagging onto what Mr. Chapman was saying about the numbers a little bit earlier.

**(6-5-9-1-89, 1):** Redevelopment of the Potomac Yard will create a vibrant mixed-use community, residents, hotels, office, retail and open space, all significant economic benefit to the city. It will enable the city to compete for existing and future federal and other large commercial users.

Their presence in Alexandria will help rebalance our tax base. The Potomac Yard and Potomac Yard North coordinate development district plans contemplate and depend on the Metro service. Constructing a new Metro station at the Potomac Yard is critical to the successful redevelopment [...]

The Chamber would also like to applaud the City on identifying the multiple funding sources in order to pay for the Potomac Yard Metro. We would like to endorse the current financing plan that had been proposed and would encourage you to continue to apply that financing strategy to future transportation projects around the city.

**Response:** Regarding financing for the project:

The Draft EIS, Chapter 5, discusses project costs and funding, based on information current as of March 2015.

The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria. The project would be financed by a variety of funding sources through a Potomac Yard Metrorail Station Fund, as discussed in Chapter 5, which includes net new tax revenues and developer contributions as well as special tax district funding. The potential funding sources do not include tax increment financing. In addition, the City continues to evaluate opportunities for Federal and state funds. The Station Fund revenues will be accounted for separately from other City general revenues. The City of Alexandria's detailed financial feasibility analysis of annual capital and operating costs, annual project revenues, estimates of Citywide economic benefits, and factors for the selection of Build Alternative B as the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)).

With regard to other major capital needs of the Metrorail system, including addressing deferred maintenance, Metro's Momentum strategic plan lays out recommendations and funding needs to address them through the year 2025. As described in the Draft EIS, Section 5.2.1, the new station would add system-wide operating costs to Metrorail. The majority of the operating funds come from the annual operating subsidy provided by member jurisdictions of the WMATA Compact.

With regard to the existing shopping center, the Draft EIS, Section 3.4 Land Use and Zoning, states the impacts of the Build Alternatives on surrounding uses. Neither Build Alternative A nor Build Alternative B would displace the existing shopping center or movie theater. Under Build Alternative B, the northern station entrance would touch down on a portion of the shopping center parking lot that, in the future, is planned for redevelopment and open space as part of a dense mixed-use development incorporating a Metrorail station entrance. The Draft EIS, Section 2.1, Local Planning Process, summarizes City of Alexandria small area planning for North Potomac Yard, which includes the existing Potomac Yard Shopping Center. The City's adopted North Potomac Yard Small Area Plan envisions the replacement of the retail center with a high-density, transit-oriented neighborhood, including 7.525 million square feet of office, retail, residential, and hotel use. (1-1-9, 1)

**(1-5-9-1-75, 1):** I also spoke against the in-fill station at NoMA, calling it a bad idea whose time has come. That station had a cost estimate -- a cost overrun of something on the order of 30 to 40 percent, and there is no reason to believe that whatever alternative they choose, other than the No-Build Alternative, which is the right alternative to choose, will not have a cost overrun of at least that magnitude [...]

It is far less expensive to enhance slightly the Metro Way Bus Rapid Transit System to perform the function that the proposed Metro station is desired to perform.

**Response:** Regarding project costs: The Draft EIS, Chapter 5, discusses project costs and funding. Section 5.1.1, Capital Cost Estimate, describes the methodology and assumptions for the cost estimates. Included in the estimates for each alternative is a contingency cost category, which accounts for potential uncertainties that may increase costs.

The Draft EIS Section 1.3, Project Purpose and Need, describes the role of bus services such as Metroway in the project study area and the need for new transit services, in addition to Metroway, to accommodate the area's forecast increase in travel demand and to provide a direct access point to the regional transit system within Potomac Yard. (1-5-9, 1)

**(1-5-9-2-27, 1):** On page 5-3, the DEIS states, "The project funding also includes a \$1 million FTA grant (FTA Project VA-95-X112 (RSTP)) that was used to fund the NEPA study for the project."

I am a little unclear on this and would appreciate clarification.

Did FTA provide the City of Alexandria with a \$1 M grant to help fund the EIS?

Did the City issue the contract for the consultant to prepare the EIS? I look forward to your response.

**Response:** The City of Alexandria received a \$1 million FTA grant, which was used to fund the NEPA study. WMATA retained the consultant that is preparing the EIS. WMATA's costs are reimbursed by the City of Alexandria. (1-5-9, 2)

**(1-5-9-2-157, 2):** On page 1-1, the DEIS states, "The Federal Transit Administration (FTA), as the lead Federal agency, and the City of Alexandria, as the project sponsor and joint lead agency, in cooperation with the Washington Metropolitan Area Transit Authority (WMATA), and the National Park Service (NPS), prepared this Draft Environmental Impact Statement (EIS), under the National Environmental Policy Act (NEPA), for the proposed Potomac Yard Metrorail Station (or "the project")..... The project consists of construction of a new Metrorail station and ancillary facilities". (Underline added)

The above statements make it appear that FTA along with a group of other entities is proposing the same thing, to approve construction of the proposed metro station. These statements are the closest the DEIS comes to describing FTA's proposed action and, the DEIS's reasonable alternatives and analysis of impacts, is based on FTA's approval of proposed construction. However, the DEIS indicates that FTA's proposed action is, to provide partial funding for construction of a metro station. Approving construction and providing funding are two different proposals and the DEIS analysis may differ depending upon which proposal is correct [...]

2. If FTA proposes to distribute funds, identify the applicant that has requested funds, the amount of funds requested, the date funds were requested, specific action(s) that are requested for funding, and the status of the requested funding.

**Response:** Section 1.1, Page 1-1, Lines 7-8 of the Draft EIS identifies FTA's role in in the project, "Because the project has the potential to utilize Federal funds, FTA is the lead federal agency for the project." As the project is still advancing, the City of Alexandria (the project sponsor) will continue to pursue Federal funds, as well as funding from other sources. (1-5-9, 3)

**(1-5-9-2-157, 3):** According to the DEIS (Chapter 5), FTA provided the City with a \$1 million grants to hire a private contractor to prepare the EIS and according to a subsequent email from FTA, WMATA retained the consultant to prepare the EIS. It is odd that a Federal agency would provide its applicant (at this time there is no documentation the City has applied for FTA action and it is assumed the City is an applicant) with funding to prepare an EIS that the FTA, not the City, is responsible for. It seems like it would have been easier and greater oversight would have been possible if FTA issued used the money to directly retain the contractor.

18. Please describe why FTA did not directly retain the EIS contractor.

**Response:** Although FTA may provide financial assistance for technical work, FTA relies on the applicant, in this case the City of Alexandria, to obtain the contractor. (1-5-9, 4)

**(1-5-9-2-157, 6):** Third-party agreements, where the Federal agency and the applicant arrange to hire a private contractor to conduct the NEPA, are not uncommon. There is no concern as long as FTA and NPS independently reviewed, analyzed, and judged that the EIS met the NEPA requirements. CEQ has issued direction regarding third-party EISs that must be documented.

19. Please provide documentation regarding the use of the NEPA contractor and compliance with 40 CFR 1506 and CEQ's 40 Questions (responses to question Nos. 16 and 17).

**Response:** The project sponsor and joint-lead agency (City of Alexandria) selected and is overseeing the contractor preparing the EIS in accordance with 40 CFR 1506.5(c). The disclosure statement relating to conflict of interest is provided in **Appendix G, Reference Materials**, of this report. (1-5-9, 5)

**(1-5-9-2-157, 4):** If the station would be constructed in the absence of FTA's proposed action, then the no action alternative would meet the project purpose, "... to improve local and regional transit accessibility to and from the Potomac Yard area adjacent to the U.S. Route 1 corridor for current and future residents, employees, and businesses".

39. If the purpose of the project would be met without FTA funding, please describe why FTA would proposed the action to fund the station.

40. If the purpose of the project would be met without FTA funding and Federal taxpayers' assistance would not be required to meet the purpose, please describe why the FTA decision-maker would consider approving the proposed action.

**Response:** For the Draft EIS, the City of Alexandria assumes at least a partial contribution of federal funds would be used to construct the Metrorail Station. This funding approach is similar to all other Metrorail facilities that have been constructed since the transit system was originally built in the 1970s. The funding approach will be updated in the Final EIS. (1-5-9, 7)

**(6-5-9-1-79, 1):** I would only note that when the Dulles Rail Project was proposed and the environmental impact statements were prepared in 2004, what actually happened was radically different, in terms of the financing structure and I'm told the EIS doesn't even consider the financial aspects and the economic consequences. And so that's a deficiency of NEPA[...]

I was a former geotech engineer 40 years ago and I am aware, somewhat, of the environmental problems and the potential remediation costs. I will be looking very carefully at what -- who is responsible for those remediation costs and what happens if they end up being more than have been projected.

**Response:** The Draft EIS, Chapter 5 describes the Project Costs and Funding, based on information current as of March 2015. The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria. (6-5-9, 1)

#### 5.5.5.18 Flooding and Stormwater Management

**(1-5-34-2-175, 1):** Sheer difference in density makes Alt A preferable from an environmental impact standpoint. Alt A=9.25 vs AltB=13.08. This density difference will affect energy usage, water treatment, recycling needs. Vehicles are well-accommodated by underground parking with no incentives to "own no car" ... density matters as this will translate to increased GHG. There are no "green roofs" discussed. No "traps" for storm runoff filtration, etc.

Negative impacts are reflected in all comparative:

- increased impervious area A(1.82) vs B(2.24). What is the heat island effect?
- natural habitat loss A(.03) vs B(2.50)
- 100 Yr Floodplain A(0) vs B(1.48 all east of existing Metrorail track). The base flood level will soon be raised (via Executive Order) from 10 to 12 or 13 feet. We are building behind the curve.
- number trees removed from original GWPW design A(5-10) vs B(15-20) Note: these are very mature trees. Acres of trees removed: A(.48) vs B(2.44)
- the buffering effect for sea level rise and near term storm surges is significantly better for AltA than Alt B
- while the "Green Scenic Easement" (1.71acres) sounds like beautification, it is in fact an alternative way to conserve vegetation, wetlands, improve water quality etc. It is high value.

Finally, any net benefit trade off or offset that features Daingerfield Island can realistically be expected to include "improvements" that include residential development on the river. While this may seem unlikely now, it is part of a well-worn and established pattern of the City of Alexandria. With density equaling tax dollars, this is tough to avoid. In addition, Daingerfield Island is in a FEMA designated floodplain and performs excellent buffering action right now - it should be retained as such ... at no cost.

**Response:** The Draft EIS, Section 3.15, Floodplains, describes potential impacts to floodplains and requirements for permitting and mitigation of any impacts. The floodplain analysis will be updated in the Final EIS to reference the new Executive Order 13690.

The Draft EIS, Section 3.19, Sustainability, states that the project will be designed consistent with the local sustainability requirements. Station design features that comply with green building policies and objectives, such as LEED Silver Certification, would be developed during detailed design phases of the project. Low Impact Development (LID) design may also be considered during later design phases including features such as bioretention facilities and permeable pavement.

With regard to sea level rise and climate change, see response in Section 5.5.5.5. (1-5-34, 1)

**(3-5-34-2-161, 28):** The discussion on page 3-198 refers the reader to section 3.15 for mitigation measures related to flooding and climate change. The discussion is vague. More information should be provided as to how the project will be designed to address any potential issues.

**Response:** A commitment to incorporate resiliency measures for foreseeable cumulative climate change impacts, in particular flooding, will be added to the Final EIS, including elevation of structures above the 500-foot floodplain. The project is not expected to lead to a net increase in GHG emissions, so no mitigation measures of direct climate change impacts by the project are proposed. (3-5-34, 1)

**(1-5-34-2-51, 1):** I live in an AE flood zone and wanted to know how the new metro along with the building plans for this area will impact (if any) other flood zones in the city.

I was told by a FEMA representative that new buildings, construction, etc. in the city can have an impact to flood areas within the city and wanted to know what the city is doing to mitigate potential flood impacts (if any) in various flood areas in the city [...]

I hope all the construction and new metro station has no impact with flooding in our area. If it does, I want to know what the city is doing to prevent an impact from occurring.

**Response:** The Draft EIS, Section 3.15, Floodplains, states that none of the three Build Alternatives or B-CSX Design Option is expected to raise the 100-year Base Flood Elevation within the project study area if constructed within the flood zones, which are associated with the Potomac River. This statement is based on the location of the large surface area of the Potomac River relative to the station area. (1-5-34, 2)

**(4-5-34-2-182, 1): ENVIRONMENTAL IMPACTS AND MITIGATION**

2. Erosion and Sediment Control; Stormwater Management. The Draft EIS discusses stormwater as part of its utilities discussion (section 3.22; see section 3.22.2 in particular, page 3-190).

2(a) Agency Jurisdiction. DEQ's Office of Stormwater Management administers Virginia's erosion and sediment control program and its stormwater management programs pursuant to the Virginia Erosion and Sediment Control Law and Regulations and the Virginia Stormwater Management Law and Regulations.

2(b) Erosion and Sediment Control Plans. The project applicant is responsible for submitting a project-specific erosion and sediment control (ESC) plan to the locality (in this case, Alexandria) for review and approval pursuant to local ESC requirements, if the project involves a land-disturbing activity of 10,000 square feet or more (2,500 square feet or more in a Chesapeake Bay Preservation Area). Depending on local requirements, the area of land disturbance requiring an ESC may be less. The ESC plan must be approved by the locality prior to any land-disturbing activity at the project site. All regulated land-disturbing activities associated with the project must be covered by the project-specific ESC plan; these include:

- On- and off-site access roads
- Staging areas;

- Borrow areas;
- Stockpiles;
- Soil intentionally transported from the project.

See "Regulatory and Coordination Needs," item 2, below.

2(c) Stormwater Management Plans. Depending on local requirements, a stormwater management plan may be required. Local stormwater management program requirements must be requested through the locality. See "Regulatory and Coordination Needs," item 2, below.

#### **(4-5-34-2-193, 1): REGULATORY AND COORDINATION NEEDS**

##### 2. Erosion and Sediment Control; Stormwater Management.

2(a) Coordination. Questions relating to Virginia's requirements relating to erosion and sediment control plans and stormwater management plans (see "Environmental Impacts and Mitigation," items 2(b) and 2(c), above) may be directed to DEQ's Office of Stormwater Management (Larry Gavan, telephone (804) 698-4040 or e-mail [larry.gavan@deq.virginia.gov](mailto:larry.gavan@deq.virginia.gov)).

In addition, questions relating to the VPDES General Permit for stormwater management (known as the VSMP permit) may be directed to the same office (Daniel Carawan, telephone (804) 698-4088 or e-mail [Daniel.Carawan@deq.virginia.gov](mailto:Daniel.Carawan@deq.virginia.gov)).

2(b) Authorities. Authorities for erosion and sediment control plans, stormwater management plans, and VSMP permits include, but are not limited to, the following:

- Erosion and sediment control plans: Virginia Code sections 62.1-44.15:51 et seq. and the Erosion and Sediment Control Regulations at 9 VAC 5-840-30 et seq. (note: "VAC" means "Virginia Administrative Code");
- Stormwater management plans: Virginia Code sections 62.1-44.15:24 et seq. and the Stormwater Management Regulations at 9 VAC 25-880-1 et seq.;
- VSMP permits: Virginia Code sections 62.1-44.15:25 and the Regulations at 9 VAC 25-880-1 through 9 VAC 25-880-70 .

**(4-5-34-2-205, 1):** (a) Agency Jurisdiction. The DEQ administers the nonpoint source pollution control enforceable policy of the VCP through the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R) and Virginia Stormwater Management Law and Regulations (VSWML&R).

(b) Erosion and Sediment Control Plan. The Applicant is responsible for submitting a project-specific erosion and sediment control (ESC) plan to the locality in which the project is located for review and approval pursuant to the local ESC requirements, if the project involves a land-disturbing activity of 10,000 square feet or more (2,500 square feet or more in a Chesapeake Bay Preservation Area). Depending on local requirements the area of land disturbance requiring an ESC plan may be less. The ESC plan must be approved by the locality prior to any land-disturbing activity at the project site. All regulated land-disturbing activities associated with the project, including on and off site access roads, staging areas, borrow areas, stockpiles, and soil intentionally transported from the project must be covered by the project specific ESC plan. Local ESC program requirements must be requested through the locality. [Reference: Virginia Erosion and Sediment Control Law §62.1-44.15 et seq.; Virginia Erosion and Sediment Control Regulations 9VAC25-840-30 et seq.]

(c) Stormwater Management Plan. Depending on local requirements, a Stormwater Management (SWM) plan may be required. Local SWM program requirements must be requested through the locality. [Reference: Virginia Stormwater Management Act §62.1-44.15 et seq.; Virginia Stormwater Management (VSMP) Permit Regulations 9VAC25-870-54 et seq.]

**(4-5-34-2-208, 1):** Virginia Water Protection Permit (CVWPP) Program - Based on the information provided, it appears the project may impact streams or wetlands, and the project manager is reminded that a VWP permit from DEQ may be required should impacts to surface waters be necessary. DEQ VWP staff recommends that the avoidance and minimization of surface water impacts to the maximum extent practicable as well as coordination with the US Army Corps of Engineers. Upon receipt of a Joint Permit Application for the proposed surface water impacts, DEQ VWP Permit staff will review the proposed project in accordance with the VWP permit program regulations and current VWP permit program guidance.

-Water Permitting/VPDES Program: The project manager is reminded that prior to construction all the applicable VPDES, and/or construction storm water, should be obtained.

**Response:** The project will comply with federal, state and local regulations and permitting requirements relating to surface waters and wetlands. Project designs and specifications for these elements will be developed during detailed design phases and will be coordinated with all applicable agencies. (4-5-34, 1)

#### 5.5.5.19 GW Parkway Aesthetics

**(1-5-10-2-14, 1):** It is simply unacceptable to tear down trees along the historic and bucolic George Washington Parkway. To detract from this view-shed is not something that should be permitted.

**(1-5-10-1-87, 1):** I also have a number of issues with mitigation. I believe that that the GW Parkway should not be encroached on, as many other people have talked about.

I believe that the visual aesthetics of the George Washington Memorial Parkway should outweigh a majority of other reasons.

**Response:** As stated in the Draft EIS, Section 3.8 Visual Resources and Section 3.9 Cultural Resources, measures to minimize and mitigate the project's visual impacts to the George Washington Memorial Parkway will be developed in coordination with the National Park Service, City of Alexandria, Virginia Department of Historic Resources, and other consulting parties for the review of the project for consistency with Section 106 of the National Historic Preservation Act. These measures will be described in the Final EIS and implemented through a Memorandum of Agreement as part of the NEPA and Section 106 processes. (1-1-10, 1)

**(2-5-10-2-170, 1):** NCPC staff understand that that the eastern portion of the DEIS study area includes the George Washington Memorial Parkway (GWMP), which is owned by the United States and administered by the National Park Service (NPS). NCPC staff also understand that the NPS administers the Greens Scenic Area easement and various access easements in the area. The DEIS notes that implementation of Build Alternatives B and C would depend on agreements by NPS for release of the scenic easement and an equal value land exchange for affected NPS property and interests in property. NCPC staff defers to the NPS to identify potential mitigation should Build Alternatives B or C become a preferred alternative and implementation requires property transfers between the City of Alexandria and the NPS or easement modifications. [...]

From the viewshed analysis, Build Alternatives B and C appear to have the most negative visual effects on the GWMP. In particular, Build Alternative B would "remove vegetation and add built elements to Viewsheds 3, 4, and 5 and the continuous view corridor, while the other viewsheds would continue to be framed by continuous vegetation. The encroachment of the Metro rail station and track into the viewshed would diminish Viewshed 3 to moderate visual quality (see Figure 3-45), Viewsheds 4 and 5 to moderately high visual quality, which would be due to the visibility of the station during winter in the case of Viewshed 4 (see Figure 3-46 and Figure 3-47), and the GWMP continuous view corridor to high visual quality;" and, Build Alternative C would "replace existing vegetation and add built elements to Viewsheds 1, 2, 4, and the continuous view corridor. As a result of the noticeable encroachment of the aerial track structure into the viewsheds and the removal of consistent vegetation, the visual quality of Viewsheds 1 and 2 would decline to low (see Figure 3-62 and Figure 3-63)."

NCPC staff look forward to working with WMATA, the City of Alexandria, and the NPS beginning at the conceptual stage on mitigation measures, including native vegetation planting and building design, to reduce visual impacts of Build Alternatives B and C if one of these alternatives were to be implemented.

NCPC staff also note that while Build Alternatives A and the B-CSX Design Option do not significantly impact the viewsheds from the GWMP towards the development at Potomac Yard, NCPC staff find that the views from potential Potomac Yard development, across the GWMP and Potomac River, and towards the District of Columbia are also important. Plantings and building designs that minimize the proposed station's impacts on viewsheds from Potomac Yard towards the District of Columbia should be considered in all Build Alternatives.

**Response:** Regarding potential visual effects of the project to the George Washington Memorial Parkway (GWMP): The Draft EIS, Section 3.8.4, Mitigation, states that station building design and materials will be refined during later project phases to mitigate impacts on visual resources. In addition to the National Park Service and the Virginia Department of Historic Resources, consulting parties with a demonstrated interest in preserving the character of the GWMP, including the National Capital Planning Commission (NCPC), will also be involved in discussions on station design and materials. NCPC approval of the project is also necessary based on provisions provided by the Capper Cramton Act. The Final EIS will include additional information on the value of scenic vistas and additional measures to mitigate impacts to viewsheds. Key architectural design refinements, such as modifications to the retaining wall, fill areas around the station, and resulting station height relative to grade level, will be included in the FEIS and its impact evaluations. Additional minor refinements proposed for mitigation of project impacts will be specified in the Record of Decision. With regard to viewsheds from Potomac Yard, the viewshed #9 in the visual resources analysis is intended to assess views from Potomac Yard that would be potentially affected by the station. (2-5-10, 1)

**(1-5-10-2-72, 1):** In addition, no commercial vehicles are presently allowed on the Parkway without a special exception granted by the Superintendent of the National Park Service, so will Alexandria seek an exemption to allow trucks and construction equipment to operate on that already congested Parkway? If this dispensation is given by the National Park Service, what additional construction impact will occur to the parklands, especially to the demolition of numerous 20 to 70 year old majestic trees?

**Response:** Regarding potential impacts to natural resources within the George Washington Memorial Parkway, as described in the Draft EIS: The City of Alexandria on May 20, 2015 adopted Build Alternative B with Construction Access Option 2 (no access from the GWMP roadway) as the preferred alternative for the project, which will be carried forward in the Final EIS. Thus, no construction traffic will use the GWMP.

Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

The Final EIS will provide additional details on proposed mitigation measures for impacts to the George Washington Memorial Parkway, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsible agencies, such as the Virginia Department of Historic Resources. (1-2-10, 1)

**(1-5-10-2-226, 2):** The complete spectrum of visual impacts is incompletely analyzed and presented. Many users of the GWMP use the resources and travel to areas such as Mount Vernon in the evening hours. As presented, the visual simulations only show daylight evaluations of visual impacts. Evening use of the parkway both to Mount Vernon and to Washington, D.C. is often a highlight of both frequent users and one time visitors to the parkway. A simulation and evaluation of the visual impact of the proposed developments at night must be presented so that decisionmakers and persons evaluating the 4(f) impacts of proposed build alternatives can realistically assess the impacts to the visual resources.

**Response:** The Final EIS will include a quantitative description of evening and winter (leaf-off) visual impacts of the No Build Alternative and Preferred Alternative, based on a single source of photo renderings. As noted in the Draft EIS in Section 3.8.4, Mitigation, station building design and materials will be refined during later project phases to mitigate impacts on visual resources. These building elements will include station lighting, which will be refined during later project phases to minimize visual impacts to the GWMP, based on industry standards for minimizing light spillover while maintaining adequate safety and security for station users and employees. Signage impacts will be mitigated as part of the Net Benefit Agreement between the City of Alexandria and NPS, with relevant information included in the Final EIS. (1-5-10, 1)

**(1-5-10-2-64, 1):** It appears to us that the viewsheds will receive the greatest impact from the projected development of the buildings in the Potomac Yards neighborhood, regardless of where the station is located. While we both very much appreciate the peaceful scenery of the parkway, we don't think the station will affect that peacefulness nearly as much as the Potomac Yards development will (and already has). Therefore, it doesn't seem to us that this should be a primary consideration in choosing the location.

**Response:** Regarding visual impacts on the George Washington Memorial Parkway: Impacts related to Potomac Yard development are assessed in Section 3.8.3.1 for the No Build Alternative for development that is expected to occur regardless of the project and in Section 3.23 Secondary and Cumulative Effects for additional development that would occur as an indirect result of the project.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors in its selection, including those resource areas and factors listed in the comments received as well as all other resources and factors evaluated in the Draft EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-5-10, 2)

#### 5.5.5.20 GW Parkway Environmental Mitigation

**(1-5-11-2-175, 1):** Negative impacts are reflected in all comparative [...]

- number trees removed from original GWPW design A(5-10) vs B(15-20) Note: these are very mature trees. Acres of trees removed: A(.48) vs B(2.44)

- the buffering effect for sea level rise and near term storm surges is significantly better for AltA than Alt B

- while the "Green Scenic Easement" (1.71acres) sounds like beautification, it is in fact an alternative way to conserve vegetation, wetlands, improve water quality etc. It is high value.

Finally, any net benefit trade off or offset that features Daingerfield Island can realistically be expected to include "improvements" that include residential development on the river. While this may seem unlikely now, it is part of a well-worn and established pattern of the City of Alexandria. With density equaling tax dollars, this is tough to avoid. In addition, Daingerfield Island is in a FEMA designated floodplain and performs excellent buffering action right now - it should be retained as such ... at no cost.

**(2-5-20-2-170, 1):** [...] 3.4.3 Land Use and Zoning-Environmental Consequences

NCPC staff understand that the eastern portion of the DEIS study area includes the George Washington Memorial Parkway (GWMP), which is owned by the United States and administered by the National Park Service (NPS). NCPC staff also understand that the NPS administers the Greens Scenic Area easement and various access easements in the area. The DEIS notes that implementation of Build Alternatives B and C would depend on agreements by NPS for release of the scenic easement and an equal value land exchange for affected NPS property and interests in property. NCPC staff defers to the NPS to identify potential mitigation should Build Alternatives B or C become a preferred alternative and implementation requires property transfers between the City of Alexandria and the NPS or easement modifications.

**Response:** Regarding potential impacts to natural resources within the George Washington Memorial Parkway, as described in the Draft EIS: The Final EIS will provide additional details on proposed mitigation measures for impacts to the George Washington Memorial Parkway, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsible agencies. Key architectural design refinements, such as modifications to the retaining wall, fill areas around the station, and resulting station height relative to grade level, will be included in the FEIS and its impact evaluations. Additional minor refinements proposed for mitigation of project impacts will be specified in the Record of Decision. (1-2-11, 1)

**5.5.5.21 Land Use**

**(4-5-20-1-249, 1):** North Potomac Yard, I was involved in the design and of the plan for that and it's, you know, mixed use, a lot of commercial, lot of office is part of the long-term vision. And so it is worrisome to hear that that potentially is being -- you know, might be degraded by, you know, recent developer concerns and such. And supporting that, I mean it was imperative that a Metro be built. Otherwise, there was a major difference in the amount of development that you could get.

We need commercial office space because it brings in a -- it enhances our tax base and moves it away from residential. To the extent that the Metro would support that in the long-term I think is a very important thing. If there isn't going to be the office, I mean Council needs to stand up and tell future councils. You can't -- you have to stand by getting that office and commercial. If you just build a townhome community, this is way too expensive a Metro to have a townhome community living next to it.

**(1-5-20-2-14, 1):** Moreover, as the area is redeveloped following construction of the station, it will both become a more expensive area, likely unaffordable to those currently residing there as it becomes yet another Ballston, Clarendon or Court House, chock full of luxury condominiums and apartments and expensive niche boutiques, and more choked with traffic along Route 1.

**(1-5-20-2-20, 1):** I do occasionally shop at Potomac Yards now -- especially for heavy things like cat litter, paper and groceries. I look at the artist rendering of the planned North Potomac Yard Redevelopment -- unless I worked there it is not a place I would go to shop or dine. Who is this being built for? -- As much of the development in Old Town -- it is not for current Alexandria residents. Old Town is another place I rarely go -- it is for tourists.

I also think it is very unrealistic to think that people that buy a new home/condominium for a half million dollars or more will not have multiple cars. We live in Del Ray -- we are one of the few homes that 1 car for 2 people -- and no boat in the yard. I think there are more homes with 2 or more cars -- why would it be different in other neighborhoods?

I am getting more and more disillusioned about how things are going in Alexandria - where is the green space going? - We need more than just pocket parks and promenades. A city that dumps raw sewage into the river every time it rains should not be considered green -- that problem should be given a much higher priority and forget the metro station.

**(1-5-20-2-28, 1):** It's hard to watch our green space disappear and see more people and businesses jammed into what little space we have left. Mowing down the meadow next to Target, for example, left many of us wondering about the animals that used to live there. Were they killed in the process? Will they scamper into traffic looking for a new home? It also left us thinking about the aesthetics of yet another building in the cramped Potomac Yards space. All the plans seem to call for buildings that will further obscure the sky from Alexandrians.

I know that developers make money off of this, construction workers get jobs, and the city gains tax revenues but from a quality of life standpoint, it already seems overcrowded around here. Does the city have any other plans for the increased tax revenue that will increase our quality of life around here? [...]

The teeny tiny pocket parks and the sliver that's called Potomac Yards Park are just depressingly small. There's been quite a bit of development in Potomac Yards already. Can we tap the brakes on this development fervor and stick with the substantial density we've got? Will we have to get in our cars and drive a distance for decent park space and a better view of the sky? I am supportive of public transit, but I've had about enough of the density as it is in this moment. Are we progressing Alexandria right into being a less desirable place to live?

**(1-5-20-7-146, 1):** Tonight is the first I've heard of the already approved Potomac Yard re-development and am totally disgusted. For me personally, the entire benefit of a Potomac Yard Metro station was to get to stores we don't have in Old Town and that I can't otherwise easily and safely access without a car. US-1 South stores are not an option because there are zero safe bike ped options.

I am also opposed to building as high as 22 stories in there, with residences that will continue to price out of low and even middle income members of the community (and the residences that have gone up along Potomac Ave suggest that will be the case).

The cost, both economically and environmentally, of the station does not bring enough benefit.

I recognize the desire to get cars off of US-1 - but the approval of the Potomac Yard redevelopment without finalization of a Metro station will make the situation worse and that was really short-sighted of the City. I walked in here 100% in favor of a new Metro station and now I see no use to the residents of Old Town.

**(1-5-20-2-175, 1):** Contradictory statements and statistics occur throughout the document, such as [...]

2) high density commercial development is anticipated between E. Glebe and Swann (not settled yet) BUT both AltA and AltB serve this area absolutely equally well.

**Response:** The Draft EIS, Section 2.1, Local Planning Process, and Section 3.5, Consistency with Local Plans, describe the City of Alexandria's plans for the Potomac Yard area, including the types and intensities of development and open space recommended in adopted plans.

With regard to land use in proximity to the alternative station locations, the Draft EIS, Section 2.5.3, Support for Project Purpose and Need, assessed the number of residents within 1/2 mile and number of employees within 1/4 mile of the proposed station entrances in 2040 based on approved development plans. In addition to the stations' proximity to planned development blocks, the estimates also account for the different levels of development permitted under each alternative based on approved plans and the resulting differing densities of development blocks within North Potomac Yard under each of the alternatives. (1-5-20, 1)

**(2-5-20-2-170, 1):** NCPC staff understand that three of the four Build Alternatives and the no-build scenario will be inconsistent with the existing zoning and as such may limit the amount of development allowed in North Potomac Yard where, if one of these three or the no-build alternative is implemented then current allowable development would be reduced by as much as 3.8 million square feet to a total of 3.7 million square feet (without modifying the Small Area Plan and zoning requirements). NCPC staff are supportive of construction of a Metrorail station which would allow the highest-density development identified for North Potomac Yard, which is an appropriate density to be located close to the region's core [...]

**Response:** Comment noted regarding the location of high-density development close to the region's core. (2-5-10, 2)

**(1-5-20-8-221, 1):** Despite the fact that the Metro Station viability study makes an impassioned plea to put the station on the scenic easement and federal government parkland, the proposed stations are separated by less than 900 feet when measured from the center of one station to the other, which is about the separation of three city blocks in Old Town. Additionally, the City made an actual scale model to show how the stations would look. However, you cannot put the two stations in the model at the same time, because they literally overlap!! This is an interesting observation, since the study asserts that one site (the more expensive one) is more attractive due to its capacity to create density, while the other site (on the grounds that it is "too far away") does not, inferring that the target travelers (the millennials) can't walk less than three Old Town City blocks.

Option B, the more costly station is also at a greater distance from the hypothetical Potomac Yards center than has been portrayed, since it is measured from the staircase that leads to the bridge to the Metro (which is very long), rather than from the station itself. This creates an illusion of closer proximity than is really the case. A straight-line estimation from the Target Store "bulls eye" to the midpoint of the two stations reveals only a 500ft difference, which is less than two Old Town City blocks. When the expensive station is touted as being within a quarter mile of Potomac Yards, in reality, only the staircase landing base to the Metro bridge is (barely) within a quarter mile. Option B is actually more than ½-mile from the center of the area of the additional density provided. In fact, over two thirds of the area claimed to be with the ¼ mile is no longer there. Then suddenly the ¼-mile rule is no longer as weighty.

Also, in walking time and separation, the more costly station is really further from the proposed developments (including those areas destined to be the first to be built) since it is much further east from Potomac Yard than the less expensive one (it is practically all the way on the George Washington Memorial Parkway).

This is a significant issue, since the expenses of building the stations are not equivalent. Even with a good deal of optimism, the annual debt servicing cost for option B the "preferred one", will be almost \$14million or over \$5 million more expensive than the other. So, in order to present the more costly station as being more alluring, the study expects that it will create more density than the less expensive one (without any real basis to do so), and that the developer will pay more for that site, but the developer is now pulling back from this aspect of the "expensive" proposal [...]

So, does it make sense for Alexandria to incur greater risk, pay higher debt servicing costs, and destroy its cultural and scenic heritage for less than 900 feet (or is it really 500ft) ? Even worse is the suggestion that having a Metro Station at the Alexandria City Court House is too far for the City Hall to feel any effect. In the case of the City's rationale for the more expensive station, the City has no valid justification for proceeding with the more expensive station.

**Response:** With regard to land use in proximity to the alternative station locations, the Draft EIS, Section 2.5.3, Support for Project Purpose and Need, assessed the number of residents within 1/2 mile and number of employees within 1/4 mile of the proposed station entrances in 2040 based on approved development plans. In addition to the stations' proximity to planned development blocks, the estimates also account for the different levels of development permitted under each alternative based on approved plans and the resulting differing densities of development blocks within North Potomac Yard under each of the alternatives.

Regarding the difference in location of Build Alternatives A and B with respect to the high-density development in North Potomac Yard: when measured using walking distances (along pedestrian bridges and sidewalks) from the station faregates (inside the northern end of each station building) to the center of the planned high-density office/retail area (near the northeast corner of the current Target store), Build Alternative B is 800 feet away while Build Alternative A is 1,650 feet away, a difference of 850 feet. (1-5-20, 2)

### 5.5.5.22 Metroway and Other Bus Services

**(4-5-31-2-189, 1):** 9(i) Additional Ideas. Lastly, DRPT also encourages the City of Alexandria and WMATA to consider multimodal access to the station. DRPT understands that the proposed station is an urban in-fill and does not require daily long-term parking. While it appears that pedestrian access is adequate from the conceptual design plans, full consideration should be given to adding bus bays and bike parking. Short-term bike parking should be covered and bike lockers should be considered for monthly storage. Bus bays should have static information displays (such as route or system maps, fare, schedule and customer service information) as well as real-time arrivals. If the station footprint does not allow for off-street bus access, on-street bays could be constructed on Potomac Avenue. This would allow the Metroway Bus Rapid Transit to serve the future station as well as allow a layover for Alexandria Transit (AT) routes 9 and 10 if they were extended to the station, which DRPT recommends. DRPT also recommends that consideration be given to routing Metrobus route 9A and AT route 4 to the future station. DRPT notes further that the station would also provide greater access to employment and shopping in Potomac Yards for residents of the Route 1 corridor in south Fairfax County, who currently only have access via local bus service. DRPT conducted a Multi-modal Alternatives Analysis between the Alexandria limit and Woodbridge that concluded in October 2014 with a recommendation for a three-phased bus rapid transit (BRT), with the first phase (between Huntington and Hybla Valley) completed by 2025. To discuss these ideas or any other concerns raised in items 9(a) through 9(i), see "Regulatory and Coordination Needs," item 8, below.

**(4-5-31-2-212, 4):** This memo summarizes comments from the Department of Rail and Public Transportation (DRPT) regarding the Draft Environmental Impact Statement (DEIS) for the proposed Potomac Yard Metrorail station in Alexandria, VA [...].

Lastly, DRPT also encourages the City of Alexandria and WMATA to consider multimodal access to the station. DRPT understands that the proposed station is an urban in-fill and does not require daily long-term parking. While it appears that pedestrian access is adequate from the conceptual design plans, full consideration should be given to adding bus bays and bike parking. Short-term bike parking should be covered and bike lockers should be considered for monthly storage. Bus bays should have static information displays (such as route or system maps, fare, schedule and customer service information) as well as real-time arrivals. If the station footprint does not allow for off-street bus access, on-street bays could be constructed on Potomac Avenue. This would allow the Metroway Bus Rapid Transit to serve the future station as well as allow a layover for Alexandria Transit (AT) routes 9 and 10 if they were extended to the station, which DRPT recommends. DRPT also recommends that consideration be given to routing Metrobus route 9A and AT route 4 to the future station. DRPT notes further that the station would also provide greater access to employment and shopping in Potomac Yards for residents of the Route 1 corridor in south Fairfax County, who currently only have access via local bus service. DRPT conducted a Multi-modal Alternatives Analysis between the Alexandria limit and Woodbridge that concluded in October 2014 with a recommendation for a three-phased bus rapid transit (BRT), with the first phase (between Huntington and Hybla Valley) completed by 2025.

**(1-4-31-2-15, 1):** Attention should be paid to proper integration of the Potomac Yard Station (presumed station name) and the Metroway bus system.

**Response:** Potential refinements to the designs and locations of on-street bus stops along Potomac Avenue to serve the station and facilitate transfers between Metrorail and bus services, including Metroway, will be considered in coordination with WMATA, the City of Alexandria, and bus service providers during later project design phases. (4-1-31, 1)

**(1-5-31-2-72, 1):** Since the BRT is currently devoid of passengers, there is only hope that its ridership will increase in the not too distant future. If the Metro stop at Potomac Yards is not built, it is one way to fulfill the promise of the BRT buses. Moreover, the BRT is justification enough to endorse a "No Build" option for a Potomac Yards Metro Stop.

**(1-5-31-1-75, 1):** The Metro Way bus can function perfectly well to distribute -- to fill the need for mass transit in that locale. From Crystal City to Braddock Road, it can distribute all the people who would use that Metro station throughout the developments to be built. It is far less expensive to enhance slightly the Metro Way Bus Rapid Transit System to perform the function that the proposed Metro station is desired to perform.

**(1-5-31-1-81, 1):** And we have not discussed, as we should, the wonderful thing that we will have even with no-build and that's the Metro Way. We shouldn't just call it the Metro Way; it is a true bus Rapid Transit. It runs on its own lanes, either on the Yard or on Route 1. It's only in mixed traffic for a very short area near the Braddock Metro. This is a true BRT. They give you all the speed of a Metro because they don't have to compete with other traffic.

Now that Arlington has given up on streetcars, they will extend the BRT across their part of the Yard, all the way into Crystal City. This is by far the best solution. It's good transit. It does not affect anybody's parkland and it's just better [...]

Overall, it will cost all a great deal because there's more financing. It's just an idea whose time has not come. We need – Metro was great in its day; I commuted on it for years, but we need new solutions and a true working BRT would serve the Yard, serve the residents nearby and not impinge on anybody's parkland. And to me, that's what matter most.

**(1-5-31-1-87, 1):** Having grown up around there, I see the Metro Way as, once completed, being a fine commuter rapid transit between Braddock Road and Crystal City.

**(1-5-31-2-20, 1):** The expensive bus lane was put in on route 1 – that should suffice.

**Response:** The Draft EIS Section 1.3, Project Purpose and Need, describes the role of Metroway in the project study area and the need for new transit services, in addition to Metroway, to accommodate the area's forecast increase in travel demand and to provide a direct access point to the regional transit system within Potomac Yard. (1-5-31, 1)

**(1-5-31-2-175, 1):** A critical omission is an absence of discussion of the role of Potomac Avenue as a north/south transit way. This vital artery makes AltA and AltB equal when distributing riders along the total corridor. When I use the metro at proposed A or B, I will have to get on a Potomac Avenue bus/streetcar to reach my final destination. Even allowing for pedestrian choice, it is likely Potomac Avenue will play the most important role in allowing riders to BOTH connect with their jobs and their homes. It is not now functional and will need additional cost to build. As it is necessary, costing should be part of the long term financial plan. Right now the Metroway Station stops are far apart and the endpoint is too far north to function well for abutting neighborhoods.

**Response:** Potential refinements to the designs and locations of on-street bus stops along Potomac Avenue to serve the station and facilitate transfers between Metrorail and bus services, including Metroway, will be considered in coordination with WMATA, the City of Alexandria, and bus service providers during later project design phases. (4-1-31, 1)

**(1-2-31-8-114, 1):** Please also extend the Metroway dedicated lanes to Reed as soon as possible as is planned.

**Response:** Future phases of the Metroway project are being planned and implemented independent from the proposed Potomac Yard Metrorail Station project. (1-1-31, 1)

**(1-2-31-1-80, 1):** And finally, the Draft EIS states that, The project is proposed to improve local and regional transit accessibility to and from the Potomac Yard area. Do we really need more options in addition to the following that already exists?

WMATA buses Metro Way, DASH, the Reagan Metro stop, the Braddock Metro stop, Capital Bikeshare, Zip Car, taxi services, Uber, and others, too many to name. How much is enough?

**Response:** The Draft EIS Section 1.3, Project Purpose and Need, describes the role of Metroway in the project study area and the need for new transit services, in addition to Metroway, to accommodate the area's forecast increase in travel demand and to provide a direct access point to the regional transit system within Potomac Yard. (1-5-31, 1)

### 5.5.5.23 Natural Resources

**(4-5-48-2-166, 1)** The Commonwealth of Virginia has completed its review of the above-referenced Draft Environmental Impact Statement (Draft EIS). The Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act and responding to appropriate federal officials on behalf of the Commonwealth. In addition, DEQ coordinates the State's review of federal consistency documents prepared pursuant to the Coastal Zone Management Act of 1972 and the Virginia Coastal Zone Management Program. The following state agencies joined in this review:

Department of Environmental Quality

Department of Health

Department of Historic Resources

Department of Forestry

Department of Transportation

Department of Rail and Public Transportation

In addition, the following state agencies, regional planning district commission, and locality were invited to comment:

Department of Game and Inland Fisheries

Department of Agriculture and Consumer Services

Marine Resources Commission

Northern Virginia Regional Commission

City of Alexandria

[...]

#### CONCLUSION.

Provided activities are performed in accordance with the recommendations which follow in the Environmental Impacts and Mitigation section of this report, this proposal is unlikely to have significant effects on ambient air quality, water quality, wetlands, and historic resources. It is unlikely to adversely affect species of animals, plants or insects listed by state agencies as rare, threatened, or endangered.

**[Note: Detailed comments by DEQ within comment #166 and responses are provided separately in Section 5.5 by sub-topic]**

Thank you for the opportunity to review this Draft EIS. If you have questions, please feel free to contact me (telephone (804) 698-41 02 or e-mail Bettina.sullivan@deq.virginia.gov) or Charles Ellis of this Office (telephone (804) 698-4195 or e-mail Charles.ellis@deq.virginia.gov).

Bettina Sullivan, Program Manager, Environmental Impact Review and Long-Range Priorities

**Response:** Information and reviews have been noted. Responses to individual comments by agencies are provided separately. Further coordination with DEQ and other agencies will occur as needed.

**(4-5-49-2-60, 1):** 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 in 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.

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

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and 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.

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

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

The Virginia Department of Game and Inland Fisheries (VDGIS) 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](mailto:gladys.cason@dgif.virginia.gov)). This project is located within 2 miles of a documented occurrence of state listed animals. Therefore, DCR recommends coordination with VDGI, Virginia's regulatory authority for the management and protection of this species to ensure compliance with the Virginia Endangered Species Act (VA ST § 29.1-563 - 570).

#### **(4-5-48-2-186, 1): ENVIRONMENTAL IMPACTS AND MITIGATION**

6. Natural Heritage Resources. Impacts and mitigation for natural heritage resources, including endangered species, are discussed in terms of habitat loss in sections 3.18.3 and 3.18.4 (pages 3-184 and 3-185). Other aspects of this topic, including listings, appear earlier in section 3.18.

##### 6(a) Agency Jurisdictions.

6(a)(1) Department of Conservation and Recreation: Division of Natural Heritage. The OCR-Natural Heritage Program's (DCR-DNH) mission is conserving Virginia's biodiversity through inventory, protection, and stewardship. The Virginia Natural Area Preserves Act (Virginia Code sections 10.1-209 through 10.1-217) codifies 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.

6(a)(2) Department of Agriculture and Consumer Services. The Endangered Plant and Insect Species Act of 1979 (Virginia Code Chapter 39, sections 3.1-102 through 3.1-1030, as amended) authorizes the Virginia Department of Agriculture and Consumer Services (VDACS) to conserve, protect and manage endangered species of plants and insects. Staff members of the VDACS Virginia Endangered Plant and Insect Species Program cooperate with the U.S. Fish and Wildlife Service, DCR-DNH and other agencies and organizations on the recovery, protection, and conservation of listed threatened or endangered species and designated plant and insect species that are rare throughout their worldwide ranges. In instances where recovery plans, developed by the U.S. Fish and Wildlife Service, are available, adherence to the order and tasks outlined in the plans is followed to the extent possible.

6(a)(3) Shared Jurisdiction. Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and OCR, OCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species.

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

6(c) Findings. DCR-DNH has searched its Biotics Data System (Biotics) for occurrences of natural heritage resources in the project area.

6(c)(i) Presence: Historically Documented Resource. Biotics historically documents the presence of natural heritage resources within two miles of the project area. However, due to the scope of the project and the distance to the resources, DCR-DNH does not anticipate that the project will adversely affect these natural heritage resources.

6(c)(ii) Recommendation: Historically Documented Natural Heritage Resource. "Historically documented" refers to a resource that was documented at least 25 years ago, and has not been confirmed by a biologist since then. However, if the historically documented resource is a state-listed animal, DCR-DNH recommends coordination with the Department of Game and Inland Fisheries because the species might still be present in the location where it was documented. In this case, DCR-DNH recommends coordination with the Department of Game and Inland Fisheries (Ellis/Baird, 5/5-6/15). See "Regulatory and Coordination Needs," item 6, below.

6(c)(iii) State-listed Plants and Insects. DCR-DNH indicates that the project will not affect any documented state-listed plants or insects.

6(c)(iv) Natural Area Preserves. OCR reports that there are no State Natural Area Preserves in the vicinity of the project.

6(d) Additional and Updated Information.

6(d)(i) Additional Information. OCR indicates that the Department of Game and Inland Fisheries (DGIF) maintains a database of wildlife locations, including threatened and endangered species, trout streams and anadromous fish waters that may contain information not documented in this letter. See "Regulatory and Coordination Needs," item 7(a), below.

6(d)(ii) Updated Information. DCR-DNH continually adds new and updated information to its Biotics Data System, and should be contacted if the scope of the project changes or six months have passed after the foregoing information is used. See "Regulatory and Coordination Needs," item 6(a), below.

## 7. Wildlife Resources.

7(a) Coordination. As the Department of Conservation indicated (see "Environmental Impacts and Mitigation," item 6(d), above), the Department of Game and Inland Fisheries (DGIF) maintains a database of wildlife locations and other information, found at <http://vafwis.org/fwis/>. For assistance in working with this database, the project manager may contact DGIF (Gladys Cason, telephone (804) 367-0909 or e-mail [Gladys.cason@dgif.virginia.gov](mailto:Gladys.cason@dgif.virginia.gov), or Angela Weller, e-mail [angela.weller@dgif.virginia.gov](mailto:angela.weller@dgif.virginia.gov)).

7(b) Authorities. Authorities for DGIF's responsibility for state-listed endangered and threatened wildlife species include, but are not limited to, Virginia Code sections 29.1-563 through 29.1-570.

**(4-5-48-2-197, 1): REGULATORY AND COORDINATION NEEDS6. Natural Heritage Resources.**

6(a) Coordination. As indicated above ("Environmental Impacts and Mitigation," item 6(d)), the passage of time (six months) or a change in the scope of the project would warrant additional consultation with the Department of Conservation and Recreation's Division of Natural Heritage (Rene' Hypes, telephone (804) 371-2708 or e-mail [rene.hypes@dcr.virginia.gov](mailto:rene.hypes@dcr.virginia.gov)).

6(b) Authorities. Authorities for DCR's natural heritage resources management and research include, but are not limited to, Virginia Code sections 10.1-209 through 10.1-217.

**(4-5-48-2-209, 1): SUBJECT: DEQ 15-055F, Potomac Yard Metro Station**

## Division of Natural Heritage

The Department of Conservation and Recreation's Division of Natural Heritage (OCR) 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.

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

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

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the OCR, OCR 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 re-submit project information and map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

The Virginia Department of Game and Inland Fisheries (VDGIF) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Gladys Cason (804-367-0909 or [An.gela.Weller@dgif.virginia.gov](mailto:An.gela.Weller@dgif.virginia.gov)). This project is located within 2 miles of documented occurrences of state listed animals. Therefore, OCR recommends coordination with VDGIF, Virginia's regulatory authority for the management and protection of this species to ensure compliance with the Virginia Endangered Species Act (VAST§§ 29.1-563- 570).

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

### **(4-5-48-2-199, 1): REGULATORY AND COORDINATION NEEDS**

#### 8. Rail and Transit Projects.

8(a) Coordination. As a participating agency in the Draft EIS, the Department of Rail and Public Transit (DRPT) is available for consultation on any of its comments (see "Environmental Impacts and Mitigation," item 9, above) (begin with Amy Inman, telephone (804) 225-3207 or e-mail [amy.inman@drpt.virginia.gov](mailto:amy.inman@drpt.virginia.gov)).

8(b) Authorities. Authorities for the activities of DRPT include, but are not limited to, Virginia Code Title 33.2, including section 33.2-284.3, which authorizes assistance to public and private entities for the improvement of passenger and freight rail transportation.

### **(4-5-48-2-200, 1): REGULATORY AND COORDINATION NEEDS**

#### 9. Roads and Vehicle Traffic.

9(a) Coordination. Questions regarding the comments of the Department of Transportation may be directed to that Department (Valerie Pardo, e-mail [Valerie.pardo@VDOT.virginia.gov](mailto:Valerie.pardo@VDOT.virginia.gov)).

9(b) Agency Jurisdiction. Authorities for the activities of VDOT include, but are not limited to, Virginia Code Title 33.1.

**Response:** Additional coordination with applicable Commonwealth of Virginia natural resource agencies will occur as needed. (4-5-48, 1)

**(4-5-48-2-196, 1) FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT**

Pursuant to the Coastal Zone Management Act of 1972, as amended, federal activities located inside or outside of Virginia's designated coastal management area that can have reasonably foreseeable effects on coastal resources or coastal uses must be implemented in a manner consistent, to the maximum extent practicable, with the Virginia Coastal Zone Management Program (VCP). The VCP consists of a network of programs administered by several state agencies. In order to be consistent with the VCP, the project activities must be consistent with the enforceable policies of the VCP; all the applicable permits and approvals listed under the enforceable policies must be obtained prior to commencing the project. DEQ coordinates the review of federal consistency determinations (FCDs, for federal agency activities) or federal consistency certifications (FCCs, for federally licensed, permitted, or funded activities) with agencies administering the enforceable and advisory policies of the VCP. Note that federal actions must be consistent, to the maximum extent practicable, with the enforceable policies, whereas federally assisted, licensed, or permitted activities must be consistent with the enforceable policies (without the qualifier).

The Draft EIS indicates that an earlier draft FCD appears in the "Water Resources Technical Memorandum," one of the appendices to the Draft EIS (see page 3-181, section 3.16.3.3). The existence of the document was not apparent to us or our reviewers during the review period. We ask that the FCD be updated, if necessary, and provided as part of the Final EIS or independently, depending on FTA's preference. Sufficient time should be allowed for its review (60 days), in keeping with the Federal Consistency Regulations (see section 930.41 (a)). Section 930.39 of these Regulations, and Virginia's Federal Consistency Information Package (available at <http://www.deq.virginia.gov/Programs/EnvironmentalImpactReview/FederalConsistencyReviews.aspx#cert>) provide content requirements for the FCD. See "Regulatory and Coordination Needs," item 11, below.

**(4-5-48-2-202, 1): REGULATORY AND COORDINATION NEEDS**

## 11. Federal Consistency.

11(a) Coordination. Questions on federal consistency (see "Federal Consistency under the Coastal Zone Management Act" heading, above) may be directed to DEQ's Office of Environmental Impact Review (begin with John Fisher, telephone (804) 698- 4339 or e-mail [john.fisher@deq.virginia.gov](mailto:john.fisher@deq.virginia.gov)).

11(b) Authorities. Authorities for federal consistency review include, but are not limited to, the following:

- Federal Coastal Zone Management Act of 1972, as amended,
- Implementing regulations at Title 15, Code of Federal Regulations, Part 930,
- State and federal legal and regulatory authorities cited in the enclosed "Enforceable Policies" and "Advisory Policies," and
- DEQ's Federal Consistency Information Package (available at <http://www.deq.virginia.gov/Programs/EnvironmentalImpactReview/FederalConsistencyReviews.aspx#cert>).

**Response:** During the Final EIS, federal consistency under the Coastal Zone Management Act will continue to be coordinated with the Virginia Department of Environmental Quality and other applicable state and federal agencies as needed. (4-5-48, 2)

**(4-5-49-2-187, 1): ENVIRONMENTAL IMPACTS AND MITIGATION**

7. Forest Resources. Forest resources are addressed in sections on visual resources, cultural resources, and parklands (respectively, sections 3.8 through 3.10 (beginning on page 3-52 and ending at page 3-152)).

7(a) Agency Jurisdiction. The Department of Forestry (DOF) reviews applications to ensure that the forest resources of the Commonwealth are managed in a sustainable manner to meet the economic, ecological, and social needs of Virginia in perpetuity. DOF is charged, pursuant to Virginia Code sections 10.1-1101, 10.1-1105, and 10.1-1106 with protecting and developing healthy, sustainable forest resources that maintain functioning forest ecosystem and improve forest health, sustaining the supply of raw materials necessary for the economic growth of Virginia's timber industry, and supporting the protection of water quality and sources of water supply within Virginia's watersheds.

7(b) Department of Forestry Preference. Of the four "build" alternatives, DOF notes that Alternative B-CSX/Design Option would have the least adverse impact on forest resources. It would:

- be built on an already-developed site,
- Require no tree removal, and
- appear to have minimal impact on the nearby National Park Service land and the viewshed.

Given that the area surrounding the footprints for the four design options is already highly urbanized, the importance of avoiding existing green corridors is heightened, and the B-CSX Design Option does the best job of the four alternatives in such avoidance.

**(4-5-48-2-210, 1):** Of the four build options, DOF notes that B-CSX design option has the least adverse impact on forest resources. It would be built on an already developed site, would require no tree removal and appears to have minimal impact on the nearby NPS land and viewshed.

Given that the area surrounding the footprint for the four design options is already highly urbanized, the importance of avoiding existing green corridors is heightened and the B-CSX design option does the best job at doing that among the four options.

**Response:** Regarding the impacts of B-CSX Design Option to forest resources compared to the other Build Alternatives:

The Draft EIS, Section 3.18, Ecosystems and Natural Habitat, discusses the potential impacts of the project alternatives to these resources and identifies potential mitigation measures.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria. The City considered a range of factors in its selection, including impacts to forest and other natural habitat areas as well as all other resources and factors evaluated in the Draft EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. The Final EIS will define mitigation measures for the preferred alternative in more detail. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (4-5-48, 3)

### 5.5.5.24 NEPA Process and Methodology

**(3-5-33-2-161, 53):** As a result of our review EPA has identified areas of concern, including deficiencies in assessment of resources and mitigation, environmental justice, children's environmental health, cumulative impacts, climate change and community impacts. Additional information should be provided regarding the assessment of environmental resources, techniques to reduce air emissions and fugitive dust, noise control practices, and vibration control techniques. Efforts should be made to further avoid and minimize impacts to environmental and community resources. Where ever possible, impacts associated with this project should be further avoided and minimized as the project design moves forward.

EPA rated the DEIS an EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts. The rating system can be found on the website [www.epa.gov/compliance/nepa/comments/ratings.html](http://www.epa.gov/compliance/nepa/comments/ratings.html). Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Ms. Barbara Okorn; she can be reached at 215-814-3330.

**Response:** Responses to specific EPA comments are provided for environmental justice (Section 5.5.5.16), children's environmental health (within NEPA Process and Methodology, Section 5.5.5.24), cumulative impacts (Section 5.5.5.13), climate change (Section 5.5.5.5), community impacts (Section 5.5.5.13), noise (Section 5.5.5.25), vibration (Section 5.5.5.42), wetlands and water resources (Sections 5.5.5.43 and 5.5.5.44), and construction impacts (Section 5.5.5.10). (3-5-33, 1)

**(1-1-33-1-86, 1):** Others have spoken to that, but I think the point that's been made that for the EIS to be released and then shortly afterward for city staff to release a separate document that includes a very sketchy outline of a deal with the Park Service means that the EIS is not complete, and frankly, actually, one might say pointedly, bypasses some important information that should be included.

**Response:** The Final EIS will incorporate any new information affecting the project since the publication of the Draft EIS and will be released for public review. Any additional agreements made between the cooperating agencies will be included in the Final EIS and is required as part of the Record of Decision (ROD). (1-1-33, 1)

**(3-5-33-2-161, 23):** Executive Order 13045 on Children's Health and Safety directs that each Federal agency shall make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children, and shall ensure that its policies, programs, activities, and standards address these risks. Analysis and disclosure of these potential effects under NEPA is necessary because some physiological and behavioral traits of children render them more susceptible and vulnerable than adults to health and safety risks. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed and their growing organs are more easily harmed. The DEIS does not clearly describe the potential direct, indirect, and cumulative impacts of the project on children's health.

- Children's Environmental Health does not appear to have been included in the DEIS. FTA should address Executive Order 13045 for the Protection of Children from Environmental Health Risks and Safety Risks. Without analysis or documentation on this topic, it cannot be assumed that there is no potential risk associated with the proposed project that may adversely affect children's health.
- Evaluation of risks to children's health should include potential direct, indirect and cumulative health impacts in the project area. We also suggest evaluating noise and vibration impacts associated with the project specific to children, identifying areas where children reside or children's facility.

**Response:** The Draft EIS, Section 3.6.3.2, page 3-41, Lines 870-873, describes the analysis related to Executive Order 13045 on Children's Health and Safety, and additional information is provided in the *Neighborhoods and Environmental Justice Technical Memorandum* in Volume II of the Draft EIS. No negative permanent impact to concentrations of children or children-serving facilities was identified due to any of the Build Alternatives. The Final EIS will describe impacts of the preferred alternative, which include the temporary closure of two playgrounds and construction traffic along residential streets in the Old Town Greens and Potomac Greens neighborhoods. The Final EIS will provide more details with regard to effects to children's health and safety and measures that will be used to avoid and minimize them. (3-5-33, 1)

**(1-1-33-1-90, 1):** We acknowledge the potential station was in the future and it was explained to us when we bought our home. What was not exactly clear were the proposed locations. It was very difficult - more difficult than some might let on, to find out where and when things were going to happen.

**Response:** The Draft EIS, Sections 1.2 Project Background and 2.1 Local Planning Process, describe the previous planning efforts and potential locations studied for a Metrorail station at Potomac Yard. (1-1-33, 2)

**(1-5-31-8-117, 1):** The review process has been thorough and well-balanced.

**Response:** Comment noted. (1-5-31, 2)

**(1-5-33-2-154, 2):** Unfortunately, the subject document fails to meet the standards of the National Environmental Policy Act (NEPA) implementing regulations and the NEPA guidance of the Federal Transit Administration (FTA). The document fails to take the requisite "hard look" at the direct, indirect, and cumulative impacts to resources within the area of potential effects. The subject document does present adequate participation by cooperating agencies or meet the standards that some cooperating agencies, such as the National Park Service (NPS), require to make an informed decision concerning matters under its responsibility. The document also does not clearly indicate the participation of approval agencies necessary to make a decision within the area surrounding Washington, D.C.

As a result of the inadequate nature of the document, a Supplemental EIS will need to be prepared and additional public review opportunity will be required in order that an informed decision can be made.

**Response:** The Draft EIS as prepared meets the statutory requirements pursuant to 23 CFR 771.123. Numerous federal agencies with potential jurisdiction over the project were invited to be cooperating agencies for the project in accordance with Section 6002 of SAFETEA-LU and 40 CFR 1501. No other federal agency claimed jurisdiction by law for the project in accordance with 40 CFR 1501.6. The Draft EIS, Appendix B lists Cooperating and Participating Agencies for the project. Therefore, a supplemental EIS is not anticipated.

The Draft EIS notes in numerous sections reviews and coordination by other agencies, as well as required agency reviews, coordination, and approvals necessary for the project. Section 4.1 of the Draft EIS discusses agency coordination completed on behalf of the project. Appendices D and F of the Draft EIS include agency consultation related to Section 4(f) and Section 106 respectively. NPS has served as a cooperating agency for all NEPA related issues.

The Final EIS will be made available for public review and comment taking into consideration all comments received for the Draft EIS. (1-5-33, 1)

**(1-5-33-2-157, 13):** Each action alternative, with the exception of B-CSX Design, would have temporary and permanent impacts to jurisdictional wetlands, requiring application to the US Army Corps of Engineers (Corps) for a 404 Clean Water Act permit [...]

9. Please describe the Corps' NEPA compliance process for the proposed approval of the 404 permit.

**Response:** Please refer to the appropriate Federal regulations regarding U.S. Army Corps of Engineers (USACE) procedures.

All NPS actions with the potential to have adverse impacts on wetlands must also comply with Director's Order 77-1. In the case where both NPS and USACE procedures apply, coordination with the appropriate USACE office will be initiated early in the process to reduce potential duplication of effort, and the NPS processes would be initiated at the design phase of the project. Furthermore, the NPS will require a Statement of Findings with the Final EIS before the Record of Decision is signed. The Statement of Findings will require its own public review period.

USACE, Virginia Department of Environmental Quality (VDEQ), Virginia Marine Resources Commission (VMRC), and NPS would further define mitigation measures specified in the Final EIS and Record of Decision, as part of the joint permit application process and NPS Director's Order 77-1, where appropriate. If wetland compensation is necessary, the wetland restoration proposal will meet the compensation requirements of both the USACE and the NPS processes as well as EO 11990 for no net loss. (1-5-33, 10)

**(1-5-33-2-157, 14):** Each action alternative, with the exception of B-CSX Design, would have temporary and permanent impacts to jurisdictional wetlands, requiring application to the US Army Corps of Engineers (Corps) for a 404 Clean Water Act permit [...]

10. Please confirm that Federal approval would not be required for the relocation of the CSX track. If Federal approval would be required, describe the Federal action and describe the planned NEPA for the action.

**Response:** As a Class I Freight Railroad, CSXT operations are governed by the regulations in 49 CFR 200 through 272 (Federal Railroad Administration) and 49 CFR 1000-1199 (Surface Transportation Board).

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Build Alternative B does not require the relocation of CSXT tracks, but the project will continue to coordinate with CSXT throughout the design phase about the specifications of the pedestrian bridges over CSXT right of way.

Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-5-33, 11)

**(1-5-33-2-157, 15):** [...]

11. Please describe the Washington Metropolitan Area Transit Authority (WMATA) and describe its role in the proposed project.

**Response:** The Washington Metropolitan Area Transit Authority (WMATA) was created by an interstate compact in 1967 to plan, develop, build, finance, and operate a balanced regional transportation system in the national capital area. WMATA is serving as a cooperating agency for the project. (1-5-33, 12)

**(1-5-33-2-157, 16):** Each action alternative, with the exception of B-CSX Design, would have temporary and permanent impacts to jurisdictional wetlands, requiring application to the US Army Corps of Engineers (Corps) for a 404 Clean Water Act permit [...]

12. Please confirm no other Federal agency besides FTA, NPS, and the Corps action will be required to approve this project.

**Response:** Numerous federal agencies with potential jurisdiction over the project were invited to be cooperating agencies for the project in accordance with Section 6002 of SAFETEA-LU and 40 CFR 1501. No other federal agency claimed jurisdiction by law for the project in accordance with 40 CFR 1501.6. The Draft EIS, Appendix B lists Cooperating and Participating Agencies for the project. The United States Army Corps of Engineers (USACE) may conduct an Alternatives Analysis to determine the Least Environmentally Damaging Practicable Alternative (LEDPA) prior to completion of the Final EIS. FTA and NPS will separately review the Final EIS and, pending their review and acceptance, NPS will issue its Record of Decision for the EIS, after which FTA will issue its own Record of Decision. (1-5-33, 13)

**(1-5-33-2-157, 17):** There are at least three potential Federal agencies with project approval authority (FTA, NPS, and the Corps) and there are five DEIS alternatives. It is not clear how the Federal approval process will be conducted. Each agency has its own mission and, it is possible that the same alternative may not be selected by all Federal agencies. NPS has already objected to Alternative B and, the B-CSX alternative was developed in response to NPS objections. The City appears to prefer Alternative B and FTA will likely select Alternative B. The Corps' 404 regulations do not allow approval of a non-water dependent action with wetland impacts, when an alternative with no wetland impacts exists. In this case, that would be B-CSX Design Alternative. In accordance with the regulations, the Corps would have no choice but to select the least environmentally damaging practicable alternative.

13. Please describe the project's planned review and approval process for the various Federal agencies.

**Response:** The EIS is being developed and will be approved in accordance with federal regulation 40 CFR 1500-1508 and 23 CFR 771. The Draft EIS, Final EIS and Record of Decision (ROD) will be made available for public review and comment in accordance with federal regulation. FTA and NPS will separately review the Final EIS and, pending their review and acceptance, NPS will issue its Record of Decision for the EIS, after which FTA will issue its own Record of Decision. (1-5-33, 14)

**(1-5-33-2-157, 18):** On page 1-3 the DEIS states, "The purpose of the project is to improve local and regional transit accessibility to and from the Potomac Yard area adjacent to the U.S. Route 1 corridor for current and future residents, employees, and businesses". This is a relatively focused purpose that appears to be more of a City purpose than an FTA or NPS purpose.

14. Please indicate if FTA and NPS concur with the DEIS project purpose. If not, provide the FTA and NPS purpose.

**Response:** A Project Management Team (PMT) was convened in the Spring 2011 for the development of the EIS and in accordance with Section 6002 of SAFETEA-LU. PMT meetings were held on a bi-weekly basis; the group is made up of representatives of FTA, City of Alexandria, NPS, and WMATA. The PMT has been integral to the development of the EIS at each phase, including the development and approval of the purpose and need statement for the project. Both FTA and NPS approved the project purpose described in the Draft EIS. (1-5-33, 15)

**(1-5-33-2-157, 19):** Section 2.2 of the DEIS describes the screening process for the development of the reasonable alternatives considered in the DEIS. The process appears to have been conducted by the City and there is no indication a screening process was conducted by FTA or NPS.

15. Please describe if, and if so how, the FTA and NPS participated in the screening process to develop the reasonable alternatives.

**Response:** Member agencies of the Project Management Team (PMT) were integral to the development of the alternatives at each phase of the project. A screening workshop was held on June 30, 2011 with the PMT and additional representatives of each agency - FTA, City of Alexandria, NPS and WMATA. Following the workshop, a screening alternatives technical memorandum was prepared and distributed for review, comment and approval by the PMT. The alternatives carried forward to the EIS were identified through this screening process. The Draft EIS, Section 2.2, describes the screening process, and Volume II of the Draft EIS, contains the detailed *Initial Screening of Alternatives* report. (1-5-33, 16)

**(1-5-33-2-157, 20):** 16. Page 1-1 of the DEIS mentions the Final Environmental Impact Statement, Metropolitan Washington Regional Rapid Rail Transit System. Please provide a brief description of the proposed action and describe the lead and cooperating Federal agencies for the FEIS.

**Response:** The lead agency for the 1975 FEIS was the Urban Mass Transportation Administration of the U.S. Department of Transportation. The FEIS was prepared "in cooperation" with the Washington Metropolitan Area Transit Authority (WMATA). The Urban Mass Transportation Administration was the predecessor to the Federal Transit Administration. No other agencies are identified on the cover page or in the front material. The proposed action contemplates construction and operation of a regional rapid transit system with eleven routes and 98.02 miles of service traversing the District of Columbia and radiating outward to suburban communities in Maryland and Virginia.(FEIS, Page 7). (1-5-33, 17)

**(1-5-9-2-157, 4):** If the station would be constructed in the absence of FTA's proposed action, then the no action alternative would meet the project purpose, "... to improve local and regional transit accessibility to and from the Potomac Yard area adjacent to the U.S. Route 1 corridor for current and future residents, employees, and businesses".

39. If the purpose of the project would be met without FTA funding, please describe why FTA would proposed the action to fund the station.

40. If the purpose of the project would be met without FTA funding and Federal taxpayers' assistance would not be required to meet the purpose, please describe why the FTA decision-maker would consider approving the proposed action.

**Response:** For the Draft EIS, the City of Alexandria assumes at least a partial contribution of federal funds would be used to construct the Metrorail Station. This funding approach is similar to all other Metrorail facilities that have been constructed since the transit system was originally built in the 1970s. The funding approach will be updated in the Final EIS. (1-5-9, 7)

**(1-5-33-2-157, 22):** On page 2-1, the DEIS states, "Throughout the NEPA process, the City of Alexandria has consulted with the Federal Transit Administration (FTA) and the National Park Service (NPS), as well as other relevant Federal and state agencies, in an effort to ensure project compliance".

Just as the City is not responsible for selecting the preferred alternative, the City is not responsible for ensuring NEPA compliance. The City is an applicant for Federal action. As DEIS co-lead, the City plays a large role in assisting FTA and NPS NEPA compliance however, FTA and NPS are the only party's that are responsible for ensuring NEPA compliance.

If the City has, or will request funds, the City has a vested financial interest in securing FTA funding. FTA has the responsibility to consider the City's request and in doing so, to ensure NEPA compliance. This is the line of responsibility that must be clear in the DEIS. And when an applicant is closely involved with the NEPA compliance, there is an additional need beyond the federally-prepared NEPA document, to show the Federal agency is directing the preparation of the DEIS. The DEIS's failure to describe the proposed Federal action, allowing the City to determine the preferred alternative, and the City's coordination to ensure Federal agency NEPA compliance, do not give the impression that NPS and FTA were directly involved with the DEIS preparation or that an independent review and analysis was conducted by FTA and NPS.

There is a concern the DEIS was unduly influenced to include Alternative B as a reasonable alternative. Specifically, it is not hard to understand why the City would want to include Alternative B due to its increased tax base as compared to the other alternatives. However, it appears Alternative B should have been eliminated from consideration and it is not clear why FTA and NPS included it as a reasonable alternative.

Alternative B would impact the George Washington Memorial Parkway and the Greens Scenic Area. NPS, as the manager of both areas, has repeatedly and strongly explained to the City and FTA that the project would not be allowed to impact these resources (Appendix H, letter dated May 1, 2012). Five alternatives were eliminated from further consideration for less reason than NPS objections to Alternative B. As described on page 2-6, these five alternatives were eliminated because they were not consistent with some development or land use plan. It appears inconsistent to eliminate these alternatives and keep Alternative B. NPS objections should have been given greater weight than inconsistency with general plans.

FTA and NPS had a responsibility under NEPA's full disclosure and transparency requirements to describe NPS objections in the DEIS, not just stick the objections found in the outskirts of an appendix. Even if NPS were not a cooperating agency, at a minimum, in order to satisfy, the DEIS should have discussed the NPS objections. It is extraordinary to include a reasonable alternative that has been denied by the Federal land manager and denied by a cooperating agency, without any notice or discussion of the objections.

20. Please describe why the FTA and NPS included Alternative B as a reasonable alternative, despite NPS objections.

**Response:** NPS was integral to the development and identification of reasonable alternatives that were carried forward to the EIS. NPS participated in the screening workshop held in June 2011. NPS staff reviewed and approved the *Initial Screening of Alternatives* report which culminated the efforts to identify alternatives. NPS staff reviewed drafts of the Draft EIS at multiple points in its preparation and approved its release.

NPS does not object to Build Alternative B based on the tentative agreement reached with the City of Alexandria, as noted in a letter to the City of Alexandria dated April 20, 2015, which is provided in **Appendix G, Reference Materials** of this report. The Final EIS will be updated to incorporate details and mitigation measures of the Net Benefit Agreement between the City of Alexandria and NPS. (1-5-33, 19)

**(1-5-33-2-157, 6):** On page 1-1, the DEIS states, "The Federal Transit Administration (FTA), as the lead Federal agency, and the City of Alexandria, as the project sponsor and joint lead agency, in cooperation with the Washington Metropolitan Area Transit Authority (WMATA), and the National Park Service (NPS), prepared this Draft Environmental Impact Statement (EIS), under the National Environmental Policy Act (NEPA), for the proposed Potomac Yard Metrorail Station (or "the project") [...] .. The project consists of construction of a new Metrorail station and ancillary facilities". (Underline added)

The above statements make it appear that FTA along with a group of other entities is proposing the same thing, to approve construction of the proposed metro station. These statements are the closest the DEIS comes to describing FTA's proposed action and, the DEIS's reasonable alternatives and analysis of impacts, is based on FTA's approval of proposed construction. However, the DEIS indicates that FTA's proposed action is, to provide partial funding for construction of a metro station. Approving construction and providing funding are two different proposals and the DEIS analysis may differ depending upon which proposal is correct.

1. Please describe FTA's proposed action.

**Response:** The proposed federal action is to provide a portion of the funding to construct a Metrorail station; thus, FTA's federal action for the project relates to funding. FTA will not be directly responsible for construction of the station. The City of Alexandria will be responsible for the construction of the station. WMATA will accept and operate the Metrorail Station. (1-5-33, 2)

**(1-5-33-2-157, 23):** On page 2-1, the DEIS states, “Throughout the NEPA process, the City of Alexandria has consulted with the Federal Transit Administration (FTA) and the National Park Service (NPS), as well as other relevant Federal and state agencies, in an effort to ensure project compliance”.

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21. Please describe why the DEIS did not discuss NPS’s objections.

22. Please describe why NPS’s objections to Alternative B were only included in an appendix.

**Response:** NPS correspondence with FTA prior to release of the Draft EIS, regarding use of the George Washington Memorial Parkway by the project, is included in the Draft EIS as Appendix H, which is referenced in Section 3.24, Construction Impacts. For potential project effects to NPS property and resources within it, the Draft EIS, Chapter 3, Environmental Consequences, describes NPS policies for all relevant resources. On April 20, 2015, NPS issued a letter to the City of Alexandria regarding agreement with the City on a package of mitigations for Build Alternative B that would provide a net benefit to the George Washington Memorial Parkway. In the April 24, 2015 *City of Alexandria’s Staff Recommendation for the Preferred Alternative*, Build Alternative B is recommended as the preferred alternative “based on its ability to enable the high-density mix of uses envisioned for North Potomac Yard, and the associated community, transportation, and economic development.” On May 20, 2015 the City of Alexandria City Council voted unanimously in selecting Build Alternative B as the preferred alternative. The Final EIS will provide additional details on proposed mitigation measures for impacts to the George Washington Memorial Parkway, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsible agencies, such as the Virginia Department of Historic Resources. (1-5-33, 20)

**(1-5-33-2-157, 25):** On page 2-1, the DEIS states, “Throughout the NEPA process, the City of Alexandria has consulted with the Federal Transit Administration (FTA) and the National Park Service (NPS), as well as other relevant Federal and state agencies, in an effort to ensure project compliance”.

Just as the City is not responsible for selecting the preferred alternative, the City is not responsible for ensuring NEPA compliance. The City is an applicant for Federal action. As DEIS co-lead, the City plays a large role in assisting FTA and NPS NEPA compliance however, FTA and NPS are the only party’s that are responsible for ensuring NEPA compliance.

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23. Please describe why the DEIS did not include mitigation for the impacts to these areas [George Washington Memorial Parkway and the Greens Scenic Area] and provide the required mitigation.

**Response:** Broad mitigation strategies for impacts to the George Washington Memorial Parkway and the Greens Scenic Area easement were presented in the Draft EIS for wetland and floodplain mitigation consistent with Virginia Department of Environmental Quality and City of Alexandria guidance.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Mitigation strategies for floodplain and wetland impacts will be further refined for the preferred alternative, and as the design moves forward, Clean Water Act permits will be obtained. Mitigation for effects to historic resources under Section 106 of the National Historic Preservation Act are still in development.

Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA’s decision and present its basis for the decision regarding the NEPA preferred alternative. (1-5-33, 21)

**(1-5-33-2-157, 26):** On page 2-1, the DEIS states, "Throughout the NEPA process, the City of Alexandria has consulted with the Federal Transit Administration (FTA) and the National Park Service (NPS), as well as other relevant Federal and state agencies, in an effort to ensure project compliance".

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24. Please provide any updates to the NPS objections that have occurred since the DEIS was issued in April 2015, including FTA's efforts to resolve the objections.

**Response:** On April 20, 2015, NPS issued a letter to the City of Alexandria regarding agreement with the City on a package of mitigations for Build Alternative B that would provide a net benefit to the George Washington Memorial Parkway. The letter concludes, "We believe that the City's current proposal appears to mitigate those impacts sufficiently so that NPS would not object to the identification of Alternative B as the locally preferred alternative." The letter is provided as an appendix to the City of Alexandria Staff Recommendation for the Preferred Alternative, which is available on the City's website:  
<http://www.alexandriava.gov/potomacyard/default.aspx?id=56902>

The letter is provided in **Appendix G, Reference Materials** of this report.

The Final EIS will provide additional details on proposed mitigation measures for impacts to the George Washington Memorial Parkway, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsible agencies, such as the Virginia Department of Historic Resources. (1-5-33, 22)

**(1-5-33-2-157, 27):** On page 2-1, the DEIS states, “Throughout the NEPA process, the City of Alexandria has consulted with the Federal Transit Administration (FTA) and the National Park Service (NPS), as well as other relevant Federal and state agencies, in an effort to ensure project compliance”.

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25. Please provide all correspondence between NPS, FTA, and the City regarding the use of Alternative B as a reasonable alternative.

**Response:** The Draft EIS, Section 2.2, describes the identification of alternatives evaluated in the Draft EIS, and Volume II of the Draft EIS, contains the detailed *Initial Screening of Alternatives* report. (1-5-33, 23)

**(1-5-33-2-157, 28):** On page 2-1, the DEIS states, “Throughout the NEPA process, the City of Alexandria has consulted with the Federal Transit Administration (FTA) and the National Park Service (NPS), as well as other relevant Federal and state agencies, in an effort to ensure project compliance”.

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26. Please describe NPS's planned NEPA compliance for the proposed project, including whether NPS plans to adopt the FTA EIS.

**Response:** NPS is serving as a cooperating agency for the project as described in the Code of Federal Regulations, 40 CFR 1501.6 and Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act A Legacy for Users Act (SAFETEA-LU). FTA and NPS will separately review the Final EIS and, pending their review and acceptance, NPS will issue its Record of Decision for the EIS, after which FTA will issue its own Record of Decision. (1-5-33, 24)

**(1-5-33-2-157, 29):** On page 2-1, the DEIS states, "Throughout the NEPA process, the City of Alexandria has consulted with the Federal Transit Administration (FTA) and the National Park Service (NPS), as well as other relevant Federal and state agencies, in an effort to ensure project compliance".

Just as the City is not responsible for selecting the preferred alternative, the City is not responsible for ensuring NEPA compliance. The City is an applicant for Federal action. As DEIS co-lead, the City plays a large role in assisting FTA and NPS NEPA compliance however, FTA and NPS are the only party's that are responsible for ensuring NEPA compliance.

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27. Please provide notification of public hearings or updates regarding future NPS actions.

**Response:** Public hearings and project updates announcements are available on the project web site at: <http://potomacyardmetro.com/>. General NPS documentation is available at the Planning, Environment and Public Comment website: <http://parkplanning.nps.gov/>. George Washington Memorial Parkway related announcements are available on the park website: <http://www.nps.gov/gwmp/getinvolved/planning.htm> (1-5-33, 25)

**(1-5-33-2-157, 30):** CEQ requires an EIS to describe the indirect impacts which include, "... growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate". (40 CFR 1508.8) Indirect impacts are called secondary impacts by the DEIS and are described as "...the project's potential to induce land development and travel demand". (Page 3-194) The DEIS is required to describe the indirect impacts of the alternatives, which would include the impacts from development induced by the alternatives and the DEIS is required to describe the cumulative impacts of the alternatives, which would consist of the incremental impact of the induced development in addition to the impact of the overall development in the area. The DEIS fails to analyze these direct and cumulative impacts.

The DEIS discusses how the population in "...Alexandria is expected to grow by 35 percent over the next 30 years, while the population of the Northern Virginia area as a whole is expected to grow by 41 percent [and] and the Potomac Yard area (City of Alexandria and Arlington County sections) is anticipated to see a 109 percent increase in population and a 138 percent increase in employment by the year 2040. The population and employment growth within the analysis area are driven primarily by the redevelopment of Potomac Yard". (Page 3-38) The DEIS states, "The construction of a Metrorail station in Build Alternatives A, D, and B-CSX Design Option locations would each allow a total of 9.25 million square feet of development within Potomac Yard. Build [and] Alternative B would allow a total of 13.075 million square feet of development in Potomac Yard. (Page 3-196)

The development is discussed in general terms and although it is clear development is included, there needs to be a description of development that would be induced by the alternatives. The induced development needs to be described in order to understand the indirect impacts.

28. For each action alternative, please describe the development that would be induced and describe how FTA reached this determination.

**Response:** The Draft EIS, Section 3.23, Secondary and Cumulative Effects, and subsections 3.23.2.1 Recent and Planned Development in Alexandria Potomac Yard and 3.23.3 Secondary Effects describe potential induced development for the project alternatives. The methodology is described in Section 3.23.1. (1-5-33, 26)

**(1-5-33-2-157, 31):** Development is described in terms of ‘millions of square feet’ “including office, retail, residential, and hotels” (page 1-3). However, the DEIS does not describe the Area of Potential Impact for the development; how much land would be impacted by development, the resources that would be impacted, or the impacts to the resources.

29. For each action alternative, please describe the environment that would be affected by the induced development, including the size of the area affected and whether it would be located within an already disturbed area.

**Response:** The Draft EIS considered the induced development potential in the Potomac Yard area of the City of Alexandria, a former railroad yard, and specifically the sub-areas shown in Figure 3-7 of the Draft EIS. Development would be focused west of the railroad tracks. No induced development would occur on NPS land due to the project. The City further subdivides Potomac Yard into Coordinated Development Districts (CDDs). The amount of development in CDD#19 (North Potomac Yard) is contingent on the Metrorail station project. (1-5-33, 27)

**(1-5-33-2-157, 32):** As shown by Table 3-1, secondary impacts for all the alternatives is the same, consisting of only “Additional traffic and visual effects from new development and the cumulative impacts are the same for the action alternatives consisting of “Cumulative traffic, visual, and floodplain effects from present and future development”.

It is difficult to understand how indirect impacts of such a substantial amount of development would only include traffic and visual resources. Table 3-1 includes a list of resources that were analyzed for the station impacts and it appears likely that at least some of these resources would also be impacted by the development. As examples, “Neighborhoods, Utilities, Noise & Vibration, Air Quality, and Increased Impervious Surface” and other resources such as Infrastructure would also likely be impacted by induced development.

30. For each action alternative, please describe the resources that would be affected by the induced development, including the construction of the development, and describe the impacts to the resources.

**Response:** The Draft EIS, Section 3.23 qualitatively evaluates the impacts of induced development due to the project alternatives in accordance with 40 CFR 1508.8(b). Overall the induced development is expected to be similar in intensity among all the build alternatives. The pace of development and construction activities will vary based on a variety of factors including long-term economic conditions and demand potential external to the project. Resources that would be affected by the induced development, and discussed in Section 3.23, include long-term traffic and transit ridership, new demands for community facilities due to increases in the residential and employee population, changes in the visual character due to building heights, and noise impacts. (1-5-33, 28)

**(1-5-33-2-157, 33):** The DEIS states the no action alternative (“no build alternative”) would include the same amount of development as the 3 of the 4 action alternatives. It does not appear correct that development would be the same

32. Please confirm the amount of development that would occur under the no action alternative.

**Response:** The Draft EIS, Section 3.4.3.8, describes the amount of development assumed for the No Build Alternative. (1-5-33, 29)

**(1-5-33-2-157, 7):** On page 1-1, the DEIS states, “The Federal Transit Administration (FTA), as the lead Federal agency, and the City of Alexandria, as the project sponsor and joint lead agency, in cooperation with the Washington Metropolitan Area Transit Authority (WMATA), and the National Park Service (NPS), prepared this Draft Environmental Impact Statement (EIS), under the National Environmental Policy Act (NEPA), for the proposed Potomac Yard Metrorail Station (or “the project”)..... The project consists of construction of a new Metrorail station and ancillary facilities”. (Underline added)

The above statements make it appear that FTA along with a group of other entities is proposing the same thing, to approve construction of the proposed metro station. These statements are the closest the DEIS comes to describing FTA's proposed action and, the DEIS's reasonable alternatives and analysis of impacts, is based on FTA's approval of proposed construction. However, the DEIS indicates that FTA's proposed action is, to provide partial funding for construction of a metro station. Approving construction and providing funding are two different proposals and the DEIS analysis may differ depending upon which proposal is correct...

3. Please provide a copy of the application submitted for FTA's proposed action.

**Response:** The Draft EIS, Section 1.1, states that, "Because the project has the potential to utilize Federal funds, FTA is the lead agency for the project." (1-5-33, 3)

**(1-5-33-2-157, 34):** The DEIS does not include development as part of the description of the no action alternative in Chapter 2. On page 2-11, the no action alternative is described as, "...the existing transportation network, plus all of the committed projects within the study area". Table No. 2-1 indicates the no action alternative would consist of transit, roadway, and non-motorized infrastructure improvements, railroad improvements, and bus service.

The DEIS notes that several of the projects described in the no action alternative have been completed or would occur in the action alternatives (Page 3-197). Actions that have been completed or actions that will occur under the action alternatives should not be included as part of the no action. As required by CEQ guidance, the no action alternative must describe the actions that would occur if FTA took no action, not regardless of FTA action. (40 Questions, Response to No. 3) Actions that have already occurred or actions that would occur in the action alternatives should not be included in the no action alternative.

On page 2-11 the DEIS states, "The Draft EIS does not detail the impacts of projects included in the No Build Alternative. However, impacts of the No Build Alternative are considered collectively as part of the secondary and cumulative effects analysis found in Section 3.23". It is not clear what is meant by 'collective impact'. On page 3-192 the DEIS states, "Under the No Build Alternative, there would be no safety and security related impacts from the Potomac Yard Metrorail Station project. However, there could be impacts from the other improvements assumed under this alternative. Identification of these impacts would be the responsibility of the agencies and jurisdictions responsible for implementing the improvements". (Underline added)

CEQ NEPA Regulations are clear that an EIS is required to analyze the environmental impacts of the no action alternative. (40 CFR 1502.14). Not discussing or stating these impacts are the responsibility of other agencies and jurisdictions is in violation of the Regulations. The impacts of the no action alternative must be afforded the same level of analysis as the impacts of the action alternatives in order to provide a proper baseline. The primary purpose of the no action alternative is to provide the baseline for comparison of the impacts of the action alternatives. The proper description of the no action alternative and its impacts is vital to an EIS's ability to provide the public and agency decision-maker with the required comparison of impacts. Failure to describe the impacts of the no action alternative is a violation of the CEQ Regulations.

33. Please ensure the correct actions are included in description of the no action alternative, including the development.

**Response:** Please refer to Section 2.3 of the Draft EIS which describes assumptions used for the No Build (no action) Alternative in detail, including assumptions used for the traffic and transit analyses. (1-5-33, 30)

**(1-5-33-2-157, 35):** The DEIS does not include development as part of the description of the no action alternative in Chapter 2. On page 2-11, the no action alternative is described as, "...the existing transportation network, plus all of the committed projects within the study area". Table No. 2-1 indicates the no action alternative would consist of transit, roadway, and non-motorized infrastructure improvements, railroad improvements, and bus service.

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34. Please describe the environment that would be affected by the no action alternative including the size of the area affected and whether it would be located within an already disturbed area.

**Response:** The study area for the No Build (no action) Alternative is shown in Figure 1-1 of the Draft EIS and described in Section 1-1. (1-5-33, 31)

**(1-5-33-2-157, 36):** The DEIS does not include development as part of the description of the no action alternative in Chapter 2. On page 2-11, the no action alternative is described as, “...the existing transportation network, plus all of the committed projects within the study area”. Table No. 2-1 indicates the no action alternative would consist of transit, roadway, and non-motorized infrastructure improvements, railroad improvements, and bus service.

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On page 2-11 the DEIS states, “The Draft EIS does not detail the impacts of projects included in the No Build Alternative. However, impacts of the No Build Alternative are considered collectively as part of the secondary and cumulative effects analysis found in Section 3.23”. It is not clear what is meant by ‘collective impact’. On page 3-192 the DEIS states, “Under the No Build Alternative, there would be no safety and security related impacts from the Potomac Yard Metrorail Station project. However, there could be impacts from the other improvements assumed under this alternative. Identification of these impacts would be the responsibility of the agencies and jurisdictions responsible for implementing the improvements”. (Underline added)

CEQ NEPA Regulations are clear that an EIS is required to analyze the environmental impacts of the no action alternative. (40 CFR 1502.14). Not discussing or stating these impacts are the responsibility of other agencies and jurisdictions is in violation of the Regulations. The impacts of the no action alternative must be afforded the same level of analysis as the impacts of the action alternatives in order to provide a proper baseline. The primary purpose of the no action alternative is to provide the baseline for comparison of the impacts of the action alternatives. The proper description of the no action alternative and its impacts is vital to an EIS's ability to provide the public and agency decision-maker with the required comparison of impacts. Failure to describe the impacts of the no action alternative is a violation of the CEQ Regulations [...]

35. Please ensure that the direct and indirect impacts of the no action alternative are described and that these impacts are compared to the impacts of the action alternatives, as required by the CEQ NEPA Regulations.

**Response:** The EIS is being prepared in accordance with CEQ regulations 40 CFR 1500-1508. The direct impacts of the project are described in Chapter 3 and specifically Sections 3.1 to 3.22 as well as 3.24 which addresses construction impacts. Indirect impacts (effects) as defined by 40 CFR 1508.8(b) are analyzed in Section 3.23 of the Draft EIS. (1-5-33, 32)

**(1-5-33-2-157, 37):** The DEIS calls defines the No Build Alternative as, "The future condition of the study area in the absence of the proposed project". Without a description of the proposed FTA action or without any explanation regarding why the station would not be constructed, it is not possible to judge the no action alternative. However, the DEIS indicates the FTA proposed action is to provide limited partial funding for the project ("Because the project has the potential to utilize Federal funds, FTA is the lead Federal agency for the Project." (Page 1-1)). If the proposed action consists of FTA funding, according to Chapter 5 of the DEIS, FTA funding is not a funding source the City is depending on for the station. Therefore, it appears the City would construct the station if FTA took no action to fund the station.

The DEIS's first sentence lumps FTA in with a group, including the City, that jointly 'propose to construct a station'. This gives the false impression that all parties have the same proposed action. The failure to distinguish FTA's proposed action from the City's 'proposed action' at the start of the DEIS effects the entire DEIS. However, the concern may be most relevant in the description of the no action alternative. The no action alternative is the antithesis of the proposed action. If the FTA (not the City's) proposed action is to approve construction, then the DEIS's existing no action alternative is proper. However, if the proposed action is for FTA to provide partial funds and the City would construct the station if the funds were not approved, then the DEIS's no action alternative and its impacts is not proper as is much of the DEIS.

36. Please describe the basis used by FTA to develop the DEIS's no action alternative.

**Response:** As described in Section 2.3, the No Build (no action) Alternative includes the existing transportation network, plus all of the committed projects within the study area. "Committed projects" are those projects listed in the region's Constrained Long Range Plan and Transportation Improvement Program. The indirect effects analysis in Section 3.23 makes further long-term assumptions about land use development in the study area based on the North Potomac Yard Small Area Plan adopted by the City of Alexandria. (1-5-33, 33)

**(1-5-33-2-157, 38):** The DEIS calls defines the No Build Alternative as, "The future condition of the study area in the absence of the proposed project". Without a description of the proposed FTA action or without any explanation regarding why the station would not be constructed, it is not possible to judge the no action alternative. However, the DEIS indicates the FTA proposed action is to provide limited partial funding for the project ("Because the project has the potential to utilize Federal funds, FTA is the lead Federal agency for the Project." (Page 1-1)). If the proposed action consists of FTA funding, according to Chapter 5 of the DEIS, FTA funding is not a funding source the City is depending on for the station. Therefore, it appears the City would construct the station if FTA took no action to fund the station.

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37. If no action alternative is based on statements made by the City, please provide copies of documentation from the City that it would not construct the station under no action alternative.

**Response:** The Draft EIS, Section 2.1, describes the local planning process for the project. (1-5-33, 34)

**(1-5-33-2-157, 39):** The DEIS calls defines the No Build Alternative as, "The future condition of the study area in the absence of the proposed project". Without a description of the proposed FTA action or without any explanation regarding why the station would not be constructed, it is not possible to judge the no action alternative. However, the DEIS indicates the FTA proposed action is to provide limited partial funding for the project ("Because the project has the potential to utilize Federal funds, FTA is the lead Federal agency for the Project." (Page 1-1)). If the proposed action consists of FTA funding, according to Chapter 5 of the DEIS, FTA funding is not a funding source the City is depending on for the station. Therefore, it appears the City would construct the station if FTA took no action to fund the station.

The DEIS's first sentence lumps FTA in with a group, including the City, that jointly 'propose to construct a station'. This gives the false impression that all parties have the same proposed action. The failure to distinguish FTA's proposed action from the City's 'proposed action' at the start of the DEIS effects the entire DEIS. However, the concern may be most relevant in the description of the no action alternative. The no action alternative is the antithesis of the proposed action. If the FTA (not the City's) proposed action is to approve construction, then the DEIS's existing no action alternative is proper. However, if the proposed action is for FTA to provide partial funds and the City would construct the station if the funds were not approved, then the DEIS's no action alternative and its impacts is not proper as is much of the DEIS [...]

38. Please ensure a proper review of the DEIS no action alternative. If FTA determines the City would construct the station if FTA took no action, please describe the correct no action alternative and its impacts.

**Response:** The No Build Alternative is presented properly in the Draft EIS for NEPA purposes. FTA assumes the project would not occur in the absence of Federal funding.

The Final EIS will describe and evaluate both the No Build Alternative and Preferred Alternative. Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS.

Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-5-33, 35)

**(1-5-33-2-157, 41):** The POTOMAC YARD METRORAIL STATION Draft Environmental Impact Statement (DEIS) fails to provide the full disclosure of the environmental consequences of the proposed Federal Transit Administration (FTA) and National Park Service (NPS) actions, as required by the National Environmental Policy Act (NEPA) and the Council on Environmental Quality's (CEQ) NEPA Regulations.

Specific issues, as discussed in detail below include: omission of a proposed action making it impossible to understand how the purpose and need for the project or how the reasonable range of alternatives were developed; an incorrect no action alternative, making it impossible to compare the impacts of the action alternatives, and failure to identify and describe the impacts of the induced development, making it impossible to understand the and cumulative indirect impacts of the proposed action.

These issues are so fundamental to the NEPA that they cannot be addressed by simply modifying the DEIS to produce a Final EIS. Rather, to provide the public with the required opportunity to review and comment on the full disclosure of impacts and to ensure informed decisions by both FTA and NPS decision-makers, FTA and NPS must issue a supplemental DEIS [...]

The DEIS does a good job analyzing the impacts of the various station alternatives. However, there are too many unknowns in the DEIS regarding the proposed action, the action alternatives, the no action alternative, and the impacts from induced development. And, in taking considerable personal time to read the many words in the DEIS and gather my thoughts and comments, I am reminded of Chris Cooley's recent review, where RG3's performance was so poor Cooley could not assess the Redskins' offense. Or the Ancient Mariner's lament,

*Water, water, everywhere,*

*And all the boards did shrink;*

*Water, water, everywhere,*

*Nor any drop to drink.*

The unknowns in the DEIS prevent FTA and NPS from meeting the requirement to provide the public with a full disclosure of the impacts of the proposed actions and a supplemental DEIS is required to ensure compliance with NEPA and CEQ NEPA Regulations.

**Response:** Comment noted. (1-5-33, 37)

**(1-5-33-2-225, 2):** The document also does not indicate that other federal agencies with jurisdiction by law or expertise have been consulted. The U.S. Commission of Fine Arts and the National Capital Planning Commission are listed in some historic background materials, however within the DEIS or scoping summary report there is no indication that they have been consulted or their opinions sought.

**Response:** FTA invited the National Capital Planning Commission to be a Participating Agency for the EIS in March 2011. NCPC accepted the invitation and provided comments on the EIS in April 2015. Other state and federal agencies which are participating agencies are listed in Appendix B of the EIS. (1-5-33, 39)

**(1-5-33-2-225, 5):** In the screening process also contains serious flaws in evaluating plans for George Washington Memorial Parkway (GWMP) as "Zoning and Local Plans" at Table 2-4 and accompanying language of the DEIS. The GWMP does not have "zoning" and it is not a "local plan." The purposes and direction for the GWMP are established by the designation of the GWMP as a unit of the National Park system and subject to the provisions of the NPS Organic Act, Management Policies, and related authorities. Indeed, documents produced by the NPS indicate that:

The GWMP was developed as a scenic parkway to help preserve the Potomac River Gorge and shoreline while serving as a memorial to the first president of the United States, George Washington. The GWMP was designated a National Park Unit in 1933. The first section, called the Mount Vernon Memorial Highway, was completed in 1932 to commemorate the bicentennial of George Washington's birth. As the Mount Vernon Memorial Highway was being completed, on May 29, 1930, President Herbert Hoover signed what became known as the Capper-Cramton Act, authorizing funds for the GWMP "to include the shores of the Potomac, and adjacent lands, from Mount Vernon to a point above the Great Falls on the Virginia side including the protection and preservation of the natural scenery of the Gorge and the Great Falls of the Potomac, the preservation of the historic Patowmack Canal, and the acquisition of that portion of the Chesapeake and Ohio Canal below Point of Rocks (Public Law 71-284, as found in Mackintosh, 1996)." This Act subsumed Mount Vernon Memorial Highway as a part of the GWMP and proposed the protection of the northern and southern shores of the Potomac.

**Response:** Table 2-4 Evaluation of Alternatives is contained within Section 2-5, Evaluation of Alternatives, which is a summary comparison of the alternatives evaluated in detail in the Draft EIS, rather than part of the screening process that was used to select alternatives for detailed consideration in the Draft EIS. As described, this section is intended to provide a broad summary of the detailed information presented in Chapter 3, Environmental Consequences. In the Final EIS, Table 2-4 will be revised to reference this topic as "Zoning and Plans" to avoid confusion that the plans are necessarily adopted by local governments, as the GWMP is a unit of the National Park Service under the United States Department of the Interior. These plans and the assessment of consistency are described in more detail in Section 3.5, Consistency with Local Plans. Additionally in the Final EIS, Consistency with Local Plans (Section 3.5 in the Draft EIS) will include and assess the Organic Act similarly to the assessment of the Capper Cramton Act. (1-5-33, 4)

**(1-5-33-2-157, 8):** On page 1-1, the DEIS states, "The Federal Transit Administration (FTA), as the lead Federal agency, and the City of Alexandria, as the project sponsor and joint lead agency, in cooperation with the Washington Metropolitan Area Transit Authority (WMATA), and the National Park Service (NPS), prepared this Draft Environmental Impact Statement (EIS), under the National Environmental Policy Act (NEPA), for the proposed Potomac Yard Metrorail Station (or "the project")..... The project consists of construction of a new Metrorail station and ancillary facilities". (Underline added)

The above statements make it appear that FTA along with a group of other entities is proposing the same thing, to approve construction of the proposed metro station. These statements are the closest the DEIS comes to describing FTA's proposed action and, the DEIS's reasonable alternatives and analysis of impacts, is based on FTA's approval of proposed construction. However, the DEIS indicates that FTA's proposed action is, to provide partial funding for construction of a metro station. Approving construction and providing funding are two different proposals and the DEIS analysis may differ depending upon which proposal is correct [...]

4. If application for FTA action has not been submitted, please describe why FTA determined the DEIS was necessary.

**Response:** Prior to scoping, FTA determined that the action had the potential to significantly affect the environment; thus, the agency determined that an Environmental Impact Statement was the appropriate Class of Action. This decision was made in accordance with 23 CFR 771.115(a). (1-5-33, 4)

**(1-5-33-2-225, 10):** The document attempts to indicate consistency or inconsistency with existing planning for the area. However, the document does not effectively present information that the Potomac Yards area has been subject to a rolling series of planning reevaluations by the City of Alexandria, with the most recent version seeks to maximize development based on past economic conditions. The rejection of other alternatives because they do not immediately align with the City of Alexandria plans is no more justified than rejecting the Potomac Yard Metro in its entirety because when first forwarded by WMATA "The Metrorail system Final EIS noted that Metrorail access at Potomac Yard could be beneficial to new industrial development and proposed a station within the vacant tracts of land near Monroe Avenue (now Slaters Lane). However, to serve existing development at the time, the City of Alexandria requested that a station instead be considered farther south at Braddock Road. The station was constructed at Braddock Road rather than at Monroe Avenue." (DEIS at 2-1).

Thus, the screening process for alternatives analyzed does not present a realistic look at alternatives available to decisionmakers, but falsely develops alternatives based on maximized development as a constraint to the screening process.

**Response:** The Draft EIS, Section 2.2, describes the screening process used to select the alternatives carried forward for detailed evaluation in the Draft EIS. As described in the section, the initial screening of alternatives used three criteria: Responsiveness to project purpose and need, Consistency with land use and development plans, and Technical feasibility. As described in Section 2.2.2.2 of the Draft EIS, only a small subset (5 out of 36) alternatives initially considered were screened out due to their basic incompatibility with plans for the Potomac Yard – these alternatives consisted of at-grade Metrorail lines running through Potomac Yard (see Figure 2-1). As noted, these alternatives would have made the implementation of a high-density, pedestrian-friendly mixed-use community in Potomac Yard impossible by requiring at-grade crossings (bridges or tunnels) over the Metrorail right-of-way. (1-5-33, 40)

**(1-5-33-2-225, 6):** The DEIS presents the standard FHWA and FTA analysis model for analysis of visual impacts from a proposal. However, the context of the impacts (that is, a unit of the National Park System) is not clearly presented within the impact analysis section. The Visual Resource Technical Memorandum describing the visual analysis process does note that the visitor experience to by parkway users would be severely impacted due to the extreme nature of damage to the visual resources of the parkway. However the characterization is stated in a convoluted manner so that a translation into plain English is required. An example of this language is: "The viewer response is high due to high viewer exposure and high viewer sensitivity, which is a result of viewer awareness by GWMP visitors." The use of such technical jargon is not limited to the technical memorandum, but finds its way into the DEIS itself. As a result, readers and decisionmakers are not able to discern the real scope and extent of impacts, despite the assignment of an undefined numerical evaluation to the impact level. Presentations of impact evaluations in this manner are not consistent with the guidance of CEQ or the DOT.

The complete spectrum of visual impacts is incompletely analyzed and presented. Many users of the GWMP use the resources and travel to areas such as Mount Vernon in the evening hours. As presented, the visual simulations only show daylight evaluations of visual impacts. Evening use of the parkway both to Mount Vernon and to Washington, D.C. is often a highlight of both frequent users and one time visitors to the parkway. A simulation and evaluation of the visual impact of the proposed developments at night must be presented so that decision makers and persons evaluating the 4(f) impacts of proposed build alternatives can realistically assess the impacts to the visual resources.

**Response:** The Draft EIS, Section 3.8, Visual Resources, provides an evaluation of the project using the Federal Highway Administration's "Visual Impact Assessment Methodology for Highway Projects". This methodology provides objective criteria for evaluating visual resources and potential effects. Section 3.8.1 describes the methodology used in the assessment to provide background to the general reader to be able to understand the assessments of the Affected Environment and Environmental Consequences in the remainder of Section 3.8. Methodological language and presentation of the numerical calculation of visual quality will be reviewed and clarified as needed in the Final EIS. The Final EIS will also include larger images of the photo renderings of the No Build Alternative and Preferred Alternative to assist the reader in seeing the anticipated effects of the alternatives.

The Final EIS will include a quantitative analysis of evening visual impacts of the No Build Alternative and Preferred Alternative. (1-5-33, 41)

**(1-5-33-2-225, 7):** As described above, the document is seriously flawed and a supplemental draft document will need to be prepared and circulated for public review and comment on the alternatives and potential effects.

**Response:** The Final EIS will be made available for public review and comment, and will be revised based on the comments received for the Draft EIS. A supplemental EIS is not anticipated. (1-5-33, 43)

**(1-5-33-2-225, 8):** Because of the piecemeal presentation of information and lack of analysis associated with implementation of any mitigation measures, other federal agencies listed as cooperators will not be able to use this document without additional work or supplementation for their own purposes. Indeed, because the Land use, Zoning, and Consistency with Local Plans Technical Memorandum has identified Alternative B as being inconsistent with existing plans for the GWMP and the resulting impacts of implementation of that alternative would constitute severe impacts to the purposes for which the parkway was established, the NPS would not be able to take actions in implementing that alternative without violating the “non-impairment” standard imposed by the NPS Organic Act and further described in the NPS Management Policies.

**Response:** All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision. Further detail regarding mitigation measures will be developed in later design phases and provided to agencies and stakeholders, as appropriate.

The Draft EIS, Section 3.5, Consistency with Local Plans, subsection 3.5.3.3 discusses the consistency of Build Alternative B with planning documents related to the GWMP. With regard to the technical memoranda provided in Volume II of the Draft EIS, the introduction to the volume notes that the technical memoranda were completed in February 2013, after which time some additional and updated analyses were completed for the B-CSX Design Option and Build Alternatives A, B, and D. The additional and updated results are presented in Volume I of the Draft EIS. Additional clarity will be provided by updating Table 3-3 in the Land Use, Zoning, and Consistency with Local Plans Technical Memorandum to reflect the results presented in Table 2-4 and the Draft and Final EIS. Consistency with Local Plans (Section 3.5 in the Draft EIS) in the Final EIS will also include and assess the Organic Act similar to the assessment of the Capper Cramton Act.

On April 20, 2015, NPS issued a letter to the City of Alexandria regarding agreement with the City on a package of mitigations for Build Alternative B that would provide a net benefit to the George Washington Memorial Parkway (see **Appendix G** of this report). The Final EIS will provide additional details on proposed mitigation measures for impacts to the George Washington Memorial Parkway, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsible agencies, such as the Virginia Department of Historic Resources. (1-5-33, 44)

**(1-5-33-2-225, 9):** Because at least one of the alternatives requires release of legally binding easements and “waiver” of regulations applicable to use of the GWMP itself, that alternative would clearly be inconsistent with the governing documents of the GWMP. As a result, the information contained within the document and used for screening purposes is inaccurate and results in a false selection of alternatives under the screening process. As a result of this flaw, the suite of alternatives needs to be reassessed and the resultant impacts subject to evaluation.

**Response:** The plans used in the screening process for the second criterion regarding consistency with land use and development plans are listed in the *Initial Screening of Alternatives* report (page 12), which is referenced in Section 2.2 and included in Volume II of the Draft EIS. These plans comprise the City of Alexandria Potomac Yard Coordinated Development District (CDD#10) Concept Plan and the North Potomac Yard Small Area Plan. Consistency of alternatives with GWMP governing documents was evaluated in the Draft EIS and described in detail in various sections of Chapter 3, Environmental Consequences. (1-5-33, 45)

**(1-5-33-2-225, 12):** The rejection of other alternatives because they do not immediately align with the City of Alexandria plans is no more justified than rejecting the Potomac Yard Metro in its entirety because when first forwarded by WMATA “The Metrorail system Final EIS noted that Metrorail access at Potomac Yard could be beneficial to new industrial development and proposed a station within the vacant tracts of land near Monroe Avenue (now Slaters Lane). However, to serve existing development at the time, the City of Alexandria requested that a station instead be considered farther south at Braddock Road. The station was constructed at Braddock Road rather than at Monroe Avenue.” (DEIS at 2-1).

**Response:** The Draft EIS, Section 2.2, describes the screening process used to select the alternatives carried forward for detailed evaluation in the Draft EIS. As described in the section, the initial screening of alternatives used three criteria: Responsiveness to project purpose and need, Consistency with land use and development plans, and Technical feasibility. As described in Section 2.2.2.2, only a small subset (5 out of 36) alternatives initially considered were screened out due to their basic incompatibility with plans for the Potomac Yard - these alternatives consisted of at-grade Metrorail lines running through Potomac Yard (see Figure 2-1). As noted, these alternatives would have made the implementation of a high-density, pedestrian-friendly mixed-use community in Potomac Yard impossible by requiring at-grade crossings (bridges or tunnels) over the Metrorail right-of-way. (1-5-33, 46)

**(1-5-33-2-61, 1):** The DEIS and the alternative proposed have significantly changed since it was released for public comment on April 3. City and Federal officials have mutually agreed that only Alternatives A & B are financially feasible. In addition, the National Park Service has given notice it would not object to the City's preferred alternative (Alternative B), and they have reached agreement on a package of land trades and the City would commit \$12 million to protect the Mount Vernon Parkway. In effect, the recently announced agreements have negated the DEIS currently out for public comment.

I ask that the following steps be taken:

1. The DEIS be amended to incorporate the new information dramatically changing the alternatives being considered and the measures for mitigating impacts to the Parkway.
2. The Mayor or City Manager make a public announcement on terms of a proposed agreement with the National Park Service and other cooperating Federal agencies.
3. The City Staff delay announcing their preferred alternative until after they have considered comments from citizens.
4. The City provide more detailed information on the proposed agreement with the National Park Service and the commitment of \$12 million for improvement of the Mount Vernon Trail and Daingerfield Island; and other parkway needs.
5. The City provide more information on construction access through the Potomac Green neighborhood and proposed limits on construction traffic.

The City staff's selection of a preferred site prior to the deadline for comments is an attempt to derail public involvement and limit consideration of other alternatives.

**(1-5-33-2-62, 1):** It would have been more appropriate if the selection of a preferred alternative was made after consideration of public comments. Not surprisingly, the staff decision coincides with an earlier agreement made with the developer regarding the location of the rail station. The announcement also unveiled recent side agreements with the National Park Service for protecting the parkway [...]

The DEIS should be amended to include the tentative agreements so citizens can provide reasonable comments on the alternatives included in the DEIS but also on the new proposed deal.

**Response:** 1. The Final EIS will incorporate any new information affecting the project since the publication of the Draft EIS and will be released for public review.

2. Any additional agreements made between the cooperating agencies will be included in the Final EIS and are required as part of the Record of Decision (ROD).

3. As the lead local agency, the City of Alexandria can select a preferred alternative at any point during the NEPA process. The City of Alexandria has selected Build Alternative B as the Preferred Alternative.

4. Any additional agreements made between the cooperating agencies will be included in the Final EIS and the Record of Decision (ROD).

5. The Final EIS will provide more information on construction access. (1-5-33, 47)

**(1-5-33-2-157, 9):** On page 3-128 the DEIS states, "FTA will make a determination of effect for the project after the preferred alternative is selected by the City of Alexandria". The City cannot select the preferred alternative. In accordance with CEQ NEPA Regulations, determining the NEPA preferred alternative is a Federal agency responsibility.

5. Please indicate if FTA and NPS would determine the preferred alternative.

**Response:** FTA and the City of Alexandria, as the lead agencies, will identify the Preferred Alternative in the Final EIS, in accordance with 23 CFR 771.125(a)(1). NPS is a cooperating agency because of the potential of the project to impact natural and cultural resources of the George Washington Memorial Parkway, but does not determine the selection of the Preferred Alternative. (1-5-33, 5)

**(1-5-33-2-157, 10):** On page 3-178, the DEIS indicates the City would need to comply with the Coastal Zone Management Act (CZMA).

6. Please indicate if FTA would be responsible for CZMA compliance and, if so, provide the status of FTA's compliance.

**Response:** FTA is responsible for CZMA compliance. FTA submitted a Federal Consistency Determination to the Virginia Department of Environmental Quality (VDEQ) Coastal Zone Management Program (CZMP) in December 2012 and submitted the Draft EIS to VDEQ in March 2015. VDEQ provided comments on the Federal Consistency Determination in January 2013 and for the Draft EIS in April 2015. (1-5-33, 6)

**(1-5-33-2-157, 11):** The description of potential NPS proposed actions is scattered in the DEIS, making it difficult to ensure a clear understanding of NPS's proposed actions for the project.

7. Please describe each NPS proposed action for this project, including the status of each action.

**Response:** NPS actions for the project include the transfer of lands from and to federal ownership for construction of the station. The transfers would be subject to approval by NPS and an equal value exchange of lands or interests in land under 54 U.S.C. 102901, and would also be contingent on the successful implementation of a Section 106 Memorandum of Agreement (MOA) developed for the Preferred Alternative. NPS could also approve the use of regulated wetlands and floodplains on NPS land in accordance with Director's Orders 77-1 and 77-2. A Wetland and Floodplain Statement of Findings is currently being prepared by NPS in accordance with the Director's Orders. The Statement of Findings will be published with the Final EIS. (1-5-33, 8)

**(1-5-33-2-157, 12):** Each action alternative, with the exception of B-CSX Design, would have temporary and permanent impacts to jurisdictional wetlands, requiring application to the US Army Corps of Engineers (Corps) for a 404 Clean Water Act permit.

8. Please provide the status of Corp actions for this project and provide notification of public hearings or updates for future CORPs actions for this project.

**Response:** The U.S. Army Corps of Engineers-Norfolk District has completed a formal Jurisdictional Determination (JD) for wetlands located within the project study area. A permit will be sought for wetland impacts resulting from the Preferred Alternative only and after the design has advanced following a Record of Decision (ROD). Notification for permit-related hearings are published on the VDEQ web site: <http://www.deq.virginia.gov/Programs/Water/WetlandsStreams/PublicNotices.aspx> (1-5-33, 9)

### 5.5.5.25 Noise

**(1-5-4-2-159, 1):** Regarding the Proposed Potomac Yard Metro Station, we are concerned about the following issues:

1) Increased noise pollution affecting the current residents of Potomac Greens. Please explain how this will be mitigated during both construction and operation.

**(1-2-4-2-160, 1):** With any option – noise pollution is a serious threat. A sound absorbing/reflecting wall should be planned to protect the most impacted neighborhood, Potomac Greens, from the environmental adversities of additional noise generated from trains, announcements, and increased rail traffic. The wall should also have a nice brick or stone like look in keeping with aesthetics of Old Town and the GW Parkway.

**Response:** Regarding on-going potential noise effects related to operation of the project:

The City of Alexandria adopted Build Alternative B as the preferred alternative for the project on May 20, 2015. For Build Alternative B, no noise impacts based on FTA and WMATA criteria are predicted at any sensitive receptors. However, other ancillary noise sources associated with the proposed station, such as Metrorail door chimes, train conductor announcements, station public address announcements, and brake noise, may be audible in the community as a new noise source but are not expected to contribute to any exceedance or noise impact, as the ambient noise levels are significantly higher. As a result, these ancillary sources were not included in the noise assessment but would be evaluated more closely during final design when the station features are finalized, and would be mitigated, as appropriate.

Noise mitigation measures are discussed in Section 3.12.4 of the Draft EIS. Proposed mitigation measures include solid platform windscreens that would mostly enclose the platform area and help screen internal noise from the outside, and design of the station public address system with speakers at relatively close spacing, permitting lower audio volumes. All mitigation measures for the preferred alternative will be specified in the Final EIS and Record of Decision. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

With regard to the recommendation in one the comments by a Potomac Greens resident for constructing a landscaped earthen berm and retaining wall to reduce station noise impacts (as well as visual impacts) to the Potomac Greens neighborhood: For the proposed berm to be effective, it would need to be more than 50 feet in height to block station mezzanine noise and the view of the station. Such a structure would have a noticeable impact on the community aesthetics at the northern end of the neighborhood and would probably eliminate the existing park.

Regarding noise impacts during construction:

For all Build Alternatives, the bulk of the construction would normally occur during daylight hours when most residents are not at home, when residents who are at home are less sensitive to construction activities, and when other community noise sources contribute to higher ambient noise levels. However, some construction activities would also occur during the nighttime and on weekends to complete the project sooner and reduce the overall duration of impact on the community. Whenever possible, construction activities would be conducted during the daytime and during weekdays and would be conducted in the City of Alexandria's Noise Control Code. Construction activities are expected to impact only the closest residences and park users in adjacent neighborhoods (Potomac Greens and Potomac Yard) and any commercial properties in the vicinity of the station construction and Metrorail track realignment. Similarly, the three Build Alternatives and B-CSX Design Option would have the potential for noise increases along detour routes and truck haul routes. This analysis made conservative assumptions regarding construction noise in order to ensure that potential maximum adverse impacts are analyzed and disclosed consistent with NEPA requirements.

All mitigation measures for the Preferred Alternative will be specified in the Final EIS. At this stage of project design, further details regarding the levels, duration, and frequency of construction-related noise are not available. Project development during the design phase will further define efforts to minimize construction impacts and, for unavoidable impacts, will define methods to mitigate impacts and restore resources to their prior condition. (1-5-4, 1)

**(3-5-4-2-161, 5):** Consider the condition of surrounding buildings, structures, infrastructure and utilities, where appropriate; and whether any special protection is needed for historic properties.

**(3-5-4-2-161, 7):** Prepare contingency measures in the event established limits are exceeded. Consider steps to avoid generating noise/vibration from cumulative operations that may exceed noise limits.

**Response:** The Draft EIS was prepared in accordance with FTA and WMATA's noise and vibration requirements. Noise mitigation measures are discussed in Section 3.12.4 of the Draft EIS. FTA's noise and vibration criteria take into consideration noise-sensitive receptors for potential noise impacts.

Construction activities will be conducted in accordance with the City of Alexandria Noise Control Code. To minimize construction related noise and address any potential exceedances of local ordinances, the project construction activities will consider using noise and vibration control measures, as stated in the Draft EIS. Specific measures could include use of alternative equipment to reduce noise and vibration, operating high noise and vibration sources as far away from sensitive receptors as possible, public notification programs to alert residents in advance of particularly disruptive activities, and complaint resolution procedures.

All mitigation measures for the Preferred Alternative will be specified in the Final EIS. At this stage of project design, further details regarding the levels, duration, and frequency of construction-related noise and vibration are not available. Project development during the design phase will further define efforts to minimize construction impacts and, for unavoidable impacts, will define methods to mitigate impacts and restore resources to their prior condition.

With regard to cumulative operations, the site experiences existing elevated ambient noise levels dominated by roadway and rail sources, aircraft take-offs and landings, freight train operations, Metrorail pass-bys, and vehicular traffic. These existing sources were included in the noise and vibration analysis. Given these elevated existing ambient noise levels additional cumulative noise impacts are not expected. (3-5-37, 2)

### 5.5.5.26 NPS Land Impacts

**(1-2-15-2-53, 1):** As a taxpayer and a voter in the City of Alexandria I am opposed to building a new metro station on any portion of our already threatened and irreplaceable park land.

**Response:** Regarding the use of parkland for the project: The Draft EIS, Section 3.10, Parkland, and Section 3.24, Construction Impacts, discuss potential impacts of the project alternatives to parkland and measures to mitigate those impacts. Separate evaluations of parklands and related resources regulated under Section 4(f) of the U.S. Department of Transportation Act of 1966, as amended, and under Section 6(f) of the Land and Water Conservation Fund Act of 1965 are included in Appendix D and Appendix F, respectively. The Final EIS will provide additional detail regarding measures to minimize and mitigate impacts to parklands by the Preferred Alternative, including details of the Net Benefit Agreement between the City of Alexandria and NPS. (1-2-15, 1)

**(1-5-15-2-59, 1):** The Potomac Yards Metro station should still be constructed, soon, where it was agreed to be sited in the 1970's Metro Plan. The National Park Service lands of the George Washington Memorial Parkway must not - by law or morals - be sacrificed to move the station onto Parkway land or easements.

**(1-5-15-1-85, 1):** The DEIS and the alternative proposals have significantly changed since it was released for public comment on April 3. City and federal officials have mutually agreed that only Alternatives A and B are financially feasible. In addition, the National Park Service has given notice it would not object to the City's preferred Alternative B and they have reached an agreement on a package of land trades to help mitigate some of the damage to the parkway.

In effect, the recent announced agreements have negated the DEIS that's currently out for public comment. I ask that the following steps be taken:

- 1) The DEIS be amended to incorporate the new information dramatically changing the alternatives being considered and measures for mitigating impacts to the parkway.
- 2) The mayor or city manager make a public announcements on terms of a proposed agreement with the National Park Service and other cooperating federal agencies.
- 3) The city staff should delay announcing their preferred alternative until they have considered comments from citizens.
- 4) The city should provide more detailed information on the proposed agreement with the National Park Service and the commitment of \$12 million for improvement of the Mount Vernon Trail and Dangerfield Island.

**(1-5-15-1-86, 1):** I think the City does have a moral debt to the parkway and we should fulfill it. There's no need to take parkland for this to deal with the problems the city planning decisions have created.

**(1-5-15-2-173, 1):** Second, Alternative A is the best solution. During the thirty years that we have lived here, no access off the GWMP has been granted and for good reason. While I understand that the City of Alexandria wants to develop the most that they can, I do not believe that the peace and tranquility of the GWMP experience should be denigrated so that the City of Alexandria can develop more. There is a very good reason for the GWMP land holdings as it provides visitors to Mount Vernon a journey that is close to what it was when George Washington road the farms. As soon as one chink is found in the GWMP scenic easement, it will be gone. Please protect the GWMP National Park for our children.

**Response:** Any action taken by NPS in conjunction with this project must be consistent with the National Park Service Organic Act, which directs NPS to "conserve the scenery and the natural and historic objects and wild life therein" (16 U.S.C. 1). NPS and the City of Alexandria would need to agree on a package of mitigations that would ensure a net benefit to the George Washington Memorial Parkway under the project.

In addition, the project must comply with Section 106 of the National Historic Preservation Act, which requires federal agencies to consider the effects of their actions on historic properties, and with Section 4(f) of the U.S. Department of Transportation Act, which protects public parks and recreational lands, wildlife refuges, and historic sites. Review of the project under these acts is being conducted in parallel with the NEPA process, as described in Section 3.9, Section 3.10, Appendix D, and Appendix F of the Draft EIS.

The Draft EIS, Section 3.3, Land Acquisitions and Displacements, subsection 3.3.3.2, Build Alternatives, Property Impacts, discusses potential impacts to NPS property and interests in property, including the Greens Scenic Area easement, by the project alternatives and the requirements for approval by NPS and a land exchange process.

In May 20, 2015 the City of Alexandria City Council voted unanimously in selecting Build Alternative B as the locally preferred alternative. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). The City considered a range of factors including community impacts and benefits as well as impacts to NPS parkland in selecting the preferred alternative. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

The Final EIS will provide additional details on proposed mitigation measures for impacts to the George Washington Memorial Parkway, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsible agencies, such as the Virginia Department of Historic Resources. The Final EIS will be updated to incorporate details of the Net Benefit Agreement between the City of Alexandria and NPS. The Final EIS will also include information on the City's selection of the preferred alternative. Key architectural design refinements, such as modifications to the retaining wall, fill areas around the station, and resulting station height relative to grade level, will be included in the FEIS and its impact evaluations. Additional minor refinements proposed for mitigation of project impacts will be specified in the Record of Decision.

FTA and NPS will separately review the Final EIS and, pending their review and acceptance, NPS will issue its Record of Decision for the EIS, after which FTA will issue its own Record of Decision. (4-2-15, 1)

#### 5.5.5.27 Other

**(1-5-15-1-83, 1):** Fourth question. The Washington Post reported that the new office building construction has leveled off and the rents have fallen. The National Gateway Building located on Glebe and Route 1 has over 360,000 available square feet for new offices and has had this since the building was first completed some five years ago. What data are you using to prove that the new "City" that would be constructed will actually be occupied?

**Response:** Discussion of planned development is found in Section 3.23.2.1 of the Draft EIS. Development volumes are based on the City of Alexandria's North Potomac Yard Small Area Plan. (4-5-15, 1)

**(1-5-27-1-91, 1):** But if this Metro were moved closer to us, it would be better for us and it would make our residents happy. Now, across the street from us there's another residential building, which also has a similar population, the Camden. And then someone mentioned the National Gateway Building, which is also across the street from us and it was available for five years and hadn't been filled in.

**Response:** With regard to land use in proximity to the alternative station locations, the Draft EIS, Section 2.5.3, Support for Project Purpose and Need, assessed the number of residents within 1/2 mile and number of employees within 1/4 mile of the proposed station entrances in 2040 based on approved development plans. In addition to the stations' proximity to planned development blocks, the estimates also account for the different levels of development permitted under each alternative based on approved plans and the resulting differing densities of development blocks within North Potomac Yard under each of the alternatives. (1-1-20, 2)

**(2-5-27-2-138, 1):** Thank you for the opportunity to review the Draft Environmental Impact Statement (EIS) for the proposed Potomac Yard Metrorail Station. Following are comments from the Department of Community Planning, Housing and Development.

Page 1-3: Suggest Crystal City label could be added to depict location of that neighborhood on the Study Area map in Figure 1-1;

2-10: Figure 2-5: legend includes category named CCPY Streetcar as depicted on map. Arlington County cancelled its streetcar program in November 2014, and as such, suggest that this category name should be changed; perhaps to just "CCPY Transitway";

2-13: Figure 2-6: Planned streets to be created in Crystal City by 2040 not shown on map;

3-25: Beginning from Line 490. Suggest revised text to clarify that both the Arlington portion of Potomac Yard and southern Crystal City include a mix of office, residential, and hotel development, with areas of ground-floor retail;

3-26: In 'Opening Year 2016 Land Use Map', is the reason for Arlington County portion of Potomac Yard to be designated as "Mixed-Use" because of the striping on Arlington's General Land Use Plan for that area? If so, suggest revisions or clarification, as this treatment may create some confusion, given that the Arlington County portion of Potomac Yard is currently designated a combination of "Low" Office/Apartment/Hotel and "Medium" Residential. In essence, both Crystal City and Arlington's Potomac Yard are mixed-use areas;

3-27: Around Line 505-507: Potomac Yard Phased Development Site Plan is designated on the Arlington County General Land Use Plan as a mix of "Low" Office-Apartment-Hotel and "Medium" Residential designations. Describing it as "high-density mix of uses" may create confusion. Suggest describing the levels of density planned for that area (1.5 FAR, 72 u/acre residential, or 110 units/acre hotel) to clarify, given that Arlington has areas that are much higher density development areas. The way it is stated also conflicts with description in lines 490+ that states "medium density office and hotel uses";

3-28: In Existing Zoning Map, if designations are kept as such, suggest having a note that says something to the effect of "For areas in Arlington, the zoning categories on the map only reflect the general character of uses permitted by zoning, and do not represent the actual Arlington County zoning districts in place in those areas";

3-31 Line 655+: suggest clarifying that "land west of U.S. Route 1 and generally south of 27th Street" is primarily light industrial; and

3-33 In Table 3-7 Summary of Local Plans, suggest middle column for GLUP read: "Reflects the overall vision for future development in Arlington".

General: Alternative D (not recommended by staff) would have particular environmental effects on Arlington County, related to construction, noise and vibration, visual effects, and storm water effects.

**Response:** For the Final EIS, maps and text descriptions regarding existing and future conditions within Arlington County will be corrected as needed based on your comments. (2-5-27, 3)

**(1-5-27-2-175, 1):** Environmental Impact:

Sheer difference in density makes Alt A preferable from an environmental impact standpoint. Alt A=9.25 vs Alt B=13.08. This density difference will affect energy usage, water treatment, recycling needs. Vehicles are well-accommodated by underground parking with no incentives to "own no car" [...] density matters as this will translate to increased GHG. There are no "green roofs" discussed. No "traps" for storm runoff filtration, etc.

Negative impacts are reflected in all comparative:

- increased impervious area A(1.82) vs B(2.24). What is the heat island effect?
- natural habitat loss A(.03) vs B(2.50)

- 100 Yr Floodplain A(0) vs B(1.48 all east of existing Metrorail track). The base flood level will soon be raised (via Executive Order) from 10 to 12 or 13 feet. We are building behind the curve.

- number trees removed from original GWPW design A(5-10) vs B(15-20) Note: these are very mature trees. Acres of trees removed: A(.48) vs B(2.44)

- the buffering effect for sea level rise and near term storm surges is significantly better for AltA than Alt B

- while the "Green Scenic Easement" (1.71acres) sounds like beautification, it is in fact an alternative way to conserve vegetation, wetlands, improve water quality etc. It is high value.

**Response:** Regarding the potential increase in impervious surface, loss of habitat tree cover, and contribution to urban "heat island effects" by the Build Alternatives: The Draft EIS, Section 3.18, Ecosystems and Natural Habitat, discusses the potential impacts of the project alternatives to these natural habitats and identifies potential mitigation measures; and Section 3.19, Sustainability, discusses applicable green building policies and consistency of the Build Alternatives with their requirements. All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision.

For other topics raised in this comment, see other sections for responses: Section 5.5.5.1 Air Pollution (greenhouse gas emissions), Section 5.5.5.5 Climate Change and Sea Level Rise, and Section 5.5.5.18 Flooding and Stormwater Management. (1-5-27, 1)

**(1-5-27-2-179, 1):** With regard to the Potomac Yard metro station issue, it appears that little or no attention has been given to the alternative for ensuring that potential Metro rail riders have economical access to their current Metro rail stations such as Crystal City, Braddock Road, etc. Rather, it appears the City of Alexandria preferred alternative appears to be construct the Potomac Yard Metro station then decide what needs to be done for economical citizen access to the nearest Metro rail station (s).

I rode the Metro rail for many years, and I was very fortunate to be able to use our condo shuttle to access our nearest Metrorail station which was about a 15 minute shuttle bus ride.

Most Metro rail stations have little or no public parking; therefore, the very key factor is ensuring the availability of frequent Metro and Dash bus service throughout the City of Alexandria area to Metro rail stations to distances to the nearest bus stop.

It appears the City of Alexandria is jumping to the Potomac Yard Metro rail station conclusion.

**Response:** Regarding enhancement of access to existing Metrorail stations versus construction of a new station: The Draft EIS, Section 1.3, describes the Project Purpose and Need, which includes the need to provide direct access to the regional transit system from within Potomac Yard. (1-5-27, 2)

**(1-5-27-2-20, 1):** I think the citizens of Alexandria should be given the opportunity to vote on whether or not a new metro station should be built between the airport and Braddock Road station. I would vote for the no build option. Reading over the EIS the only "benefit" of building a metro station I saw was the potential for increased development volume – only for one alternative. We do not need higher volume development. The development at Potomac Yard is too dense already. Building near metro station does not guarantee occupancy. A friend has lived in an almost empty apartment building in walking distance of the Braddock Road station for several years – he is moving out because it is too expensive.

**Response:** Regarding the process for selection of a Preferred Alternative (including a No Build Alternative) and associated public involvement:

The Draft EIS, Chapter 4.0, Public and Agency Involvement, summarizes public involvement conducted during the EIS process for the project.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria.

This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-5-27, 3)

**(1-5-27-8-104, 1):** Move Metro closer to Arlington land

Get money from Arlington!

**Response:** Regarding a station location near Arlington County and pursuing Arlington County funding sources: The Draft EIS, Section 2.1, Local Planning Process, describes the City of Alexandria's planning process for the project and its location within the city, and Chapter 5, Project Costs and Funding, describes proposed funding sources for the project. (1-5-27, 4)

**(1-5-27-8-123, 1):** For City/VDOT, please change signal at Route 1 and Reed so that pedestrian crossing walk sign is automatically activated rather than requiring push button. Also please consider changing name of Route 1 to Richmond Highway.

**Response:** The comments are outside of the scope of the project. (1-5-27, 5)

**(4-5-27-2-211, 1):** Comments From VDH Office of Environmental Health Services:

[...] OEHS has no comments on the proposed project. Thanks for the opportunity to comment.

**(4-5-27-2-209, 1):** The remaining DCR divisions have no comments regarding the scope of this project. Thank you for the opportunity to comment.

**Response:** Comment noted. (4-5-27, 6)

### 5.5.5.28 Parking

**(1-5-39-2-159, 1):** Regarding the Proposed Potomac Yard Metro Station, we are concerned about the following issues [...]

4) Parking in Potomac Greens, particularly near the intersection of Potomac Greens Drive and Carpenter Road. Please explain how traffic and unauthorized parking will be controlled in this area.

**(1-5-39-2-152, 1):** I am a resident of Potomac Greens and am deeply concerned about the increased level of traffic and parking that will result from approval and construction of the proposed Potomac Yard metro station. While promises have been made that there are no 'kiss and ride' or bus facilities routes for access to the metro being provided in or through the Potomac Greens neighborhood, once this station opens, savvy commuters will take it up to themselves to utilize the neighborhood for drop off and pickup of passengers, and utilize neighborhood streets as their personal parking lot.

Potomac Greens is not currently designated as a residential parking district and, to date, residents have enjoyed ample parking for themselves and their guests. This significant component to the peaceful enjoyment of our neighborhood will permanently end once the proposed metro station is open and operational.

Therefore, as mitigation for the perpetual disturbance that will be placed upon the neighborhood by virtue of a potential metro station, 1) Potomac Greens should be established as a residential parking district, 2) Potomac Greens residents should receive fee-free parking permits for their vehicles, and 3) enforcement of the parking regulation should be strictly enforced to ensure the neighborhood does not become a de facto metro parking lot.

**(1-5-39-8-109, 1):** No one mentioned anything about how many more people from the city (Washington DC) would come to shop at the mall. Huge \$ coming to a place where people are not going to switch to a bus to go to the mall.

Is there going to be any parking?

**Response:** The Draft EIS, Section 3.2.3.2, Parking Facilities, states that the introduction and enforcement of parking restrictions, including time limits and residential parking, would largely avoid and minimize the impacts of Metrorail patrons attempting to park along public streets in adjoining neighborhoods. The Final EIS will address any additional traffic mitigation measures needed as required for the project. Future design phases for the project will develop more detailed plans for managing traffic along public streets in the vicinity of station entrances. (1-5-39, 1)

**(1-5-39-5-168, 1):** For people being driven to the station the following considerations should be incorporated. The Potomac Yard station is an urban station without parking or any kiss and ride facility. The design should be to encourage non-motorized transportation.

-There should be some accommodations for drivers to safely drop off passengers without stopping in active traffic lanes.

**Response:** Regarding accommodations for drivers to safely drop off passengers without stopping in active traffic lanes: Future design phases for the project will develop more detailed plans for managing traffic along public streets in the vicinity of station entrances. See Section 5.5.5.29 for comments and responses regarding pedestrian access. (2-5-39, 1)

**(1-5-33-2-157, 21):** One of the biggest problems with existing metro stations is the lack of parking or insufficient parking. Therefore it is surprising that additional parking is not included in the action alternatives

17. Please describe why additional parking is not included as part of each action alternative.

**Response:** This station is envisioned as an urban Metrorail station, consistent with the City of Alexandria's adopted plans for Potomac Yard (described in the Draft EIS, Section 2.1, Local Planning Process), which include dense mixed-use, transit-oriented development in close proximity to the proposed station location. Urban stations are intended to be primarily accessed via foot, bicycle, and connecting transit services. Adjacent parking facilities would limit the ability to provide transit-oriented development in close proximity to the station and prioritize access by non-auto modes. (1-5-33, 18)

### 5.5.5.29 Pedestrian Access

**(1-5-0-2-54, 1):** During the construction process for the Potomac Yards Metro Station, would it be possible to add to build a pedestrian/ bicycle tunnel/bridge under/over the George Washington Parkway so that people may access the wonderful Mount Vernon Trail and Daingerfield Island from the new metro station?

**(2-5-0-5-168, 1):** Accessibility applies not only at the station itself but from the time the transit user walks out their front door. They have the options of walking, cycling, or being driven. They also can take a bus on their way to the station. The infrastructure for walking and cycling should be readily available and safe as to encourage these modes. Strong encouragement for these modes will reduce the tendency for using their cars. The bus routes to the station should be within reasonable walking distance.

For people walking to the station the following considerations should be incorporated.

- Starting at one half mile from the station (which would be the general maximum walking distance), sidewalks and crosswalks should be in optimum condition with the design for safety paramount. All these should be ADA compliant.

- Crosswalks going East/West across Route 1 should be highly visible and pedhead timing set to allow enough time for our senior citizens and those who are disabled to safely cross.

- Crosswalks at Slaters Lane should be reviewed to accommodate additional traffic to cross safely.

- Enough crosswalks across Potomac Avenue to encourage safe and comfortable crossing.

- Once across Potomac Avenue the pedestrian access should be separate from cycling traffic. At present the bike path is only a few feet from Potomac Avenue which is a definite problem.

- Bike paths and pedestrian walkways should be separate to deconflict these two modes of transportation [...]

In summary, accessibility, particularly for people who walk and bike should be incorporated into the details design efforts, addressing as many of the features delineated above as possible.

**(1-5-0-7-151, 1):** 4) Pedestrian tunnels instead of bridges would be preferable for access.

**Response:** The Draft EIS, Section 2.4, Build Alternatives, notes that all station alternatives incorporate a pedestrian and bicycle bridge between the Potomac Yard and the Potomac Greens neighborhoods that will be open 24 hours a day. Pedestrian accommodations will be provided at each station entrance in accordance with Metro station access guidelines and design criteria. More detailed design of these facilities will be included in future project design phases after the conclusion of the NEPA review process. The City of Alexandria is responsible for planning pedestrian access between the station and surrounding origins/destinations. All comments received on the Draft EIS have been reviewed by the City of Alexandria. (1-2-19, 3)

**(1-5-0-2-72, 1):** Alternative A, which will cost about \$209 million, is adjacent to Potomac Greens, and Alternative B, which is calculated to be \$268 million, is very close to the Potomac Yards mall, but is also on a scenic easement owned by the National Park service. Neither location will be outfitted with a Kiss-and-Ride lot, so potential riders must walk to these locations. This may be difficult for some, especially for the handicapped.

**Response:** Regarding station access for disabled persons: All station facilities will be designed in accordance with the Americans with Disabilities Act guidelines. As you have noted, the station will not have an off-street Kiss & Ride facility, but accommodations will be developed during more detailed design phases for on-street pick-up and drop-off of station patrons in close proximity to the station similar to other urban stations. (1-5-0, 1)

### 5.5.5.30 Pollution Prevention

**(4-5-53-2-201, 1):** 10. Pollution Prevention.

10(a) Coordination. As indicated above ("Environmental Impacts and Mitigation," item 11(b)), DEQ's Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques. For details, project proponents may contact that Office (begin with Meghan Quinn, telephone (804) 698-4021 or e-mail [Meghann.quinn@deq.virginia.gov](mailto:Meghann.quinn@deq.virginia.gov)).

10(b) Authorities. DEQ's responsibilities for pollution prevention stem from the Governor's Executive Order Number Nineteen (2010).

**Response:** Further detail regarding these project elements will be developed and presented in the Final EIS and/or later design phases and provided to agencies and stakeholders, as appropriate. (3-5-29, 2)

### 5.5.5.31 Potomac Greens Neighborhood

**(1-5-28-2-65, 1):** If there is no provision for kiss & ride at the Potomac Yards entrance, we are concerned that our neighborhood, with its quiet streets and minimal traffic, might become a de facto kiss & ride location, (even over Braddock Road) [...] We would urge renewed consideration of adding a kiss and ride option to the Potomac Yards entrance. Failing that, we would like there to be some thought as to how the situation could be addressed if the station does indeed significantly increase traffic within our neighborhood.

**(1-5-28-1-87, 1):** I have a number of concerns with the build alternatives and I guess the most important one is a walkway at the most northern end of our neighborhood that will certainly cause a lot of issues with traffic density. I believe that we'll have to probably get parking permits for our vehicles. Obviously, anyone that has Google Maps will know that the east side of the train tracks, the best place to Kiss and Ride, will be our neighborhood. The Potomac Greens area, the Old Town Greens area, Potomac Crossing will certainly be impacted to a huge degree on Slater's Lane as well. You may or may not know that Slater's Lane has progressively gotten worse and worse during rush hour traffic. And I haven't seen anyone talk about improvements to how Slater's Lane accesses the George Washington Memorial Parkway. I also have a number of issues with mitigation. I believe that that the GW Parkway should not be encroached on, as many other people have talked about.

**(1-5-28-8-126, 1):** The city needs to control non-resident access to Potomac Greens so that the neighborhood during rush hour.

**(1-5-28-2-159, 1):** Regarding the Proposed Potomac Yard Metro Station, we are concerned about the following issues:

- 1) Increased noise pollution affecting the current residents of Potomac Greens. Please explain how this will be mitigated during both construction and operation.
- 2) Increased vibration affecting the current residents of Potomac Greens. Please explain how this will be mitigated during both construction and operation.
- 3) Decreased aesthetics in the neighborhood, to include reduced vegetation, destroyed wetlands, and constant lighting from the station. Please explain how this will be mitigated.
- 4) Parking in Potomac Greens, particularly near the intersection of Potomac Greens Drive and Carpenter Road. Please explain how traffic and unauthorized parking will be controlled in this area.
- 5) Decrease in the overall security of the affected areas of Potomac Greens. Please explain how security will be maintained at current levels.
- 6) There will be severe inconveniences to the Potomac Greens residences during construction. Please explain how this will be mitigated and the timing of the construction period.

**(1-2-28-8-113, 1):** Safety and environmental issues are important to address for the PG [Potomac Greens] neighborhood + surrounding area.

**Response:** Regarding potential effects of the project on the Potomac Greens neighborhood:

As noted in the comments, some of the additional vehicular trips generated by the station may use local neighborhood streets to access the station for passenger drop-offs and pick-ups. Although these additional trips are not expected to degrade overall roadway and intersection LOS, they may be noticeable on streets that currently have very low traffic volumes. The introduction and enforcement of parking restrictions, including time limits and residential permitting, would largely avoid and minimize the impacts of Metrorail patrons attempting to park along public streets in adjoining neighborhoods. Additional traffic calming measures may be considered during later project phases.

The Draft EIS, Section 3.24, Construction Impacts, describes potential impacts and identifies broad minimization and mitigation measures for impacts such as those stated in the comments. All mitigation measures for the Preferred Alternative will be specified in the Final EIS and Record of Decision. Project development during the design phase will further define efforts to minimize construction impacts and, for unavoidable impacts, will define methods to restore resources to their prior condition. During these later design phases, a Transportation Management Plan (TMP) will be developed. The TMP will address construction activities related to the project as well as permanent station operations and will be prepared in coordination with VDOT, the City of Alexandria, and other agencies as applicable.

For construction of the preferred alternative, Build Alternative B, significant excavation activities with the potential to affect adjacent building foundations are not likely to occur near residences. Plans for construction excavation activities and measures to prevent settling impacts to adjacent structures will be confirmed during the final design phase of the project when details of the project components and the construction scenarios are finalized.

Regarding security in the vicinity of the station, the Draft EIS, Section 3.21, Safety and Security, describes measures used at Metrorail stations to create a secure environment for patrons. WMATA's Metro Transit Police Department will perform law enforcement and public safety services at the station, and the City of Alexandria Police Department will perform these services in the station vicinity. All comments received on the Draft EIS have been reviewed by WMATA and the City of Alexandria.

The Final EIS will also include a description of future public outreach, including how information will be disseminated to affected parties regarding project effects, and proposed mitigation measures for them.

See responses elsewhere in this section to specific topics of concern –comments and responses related to Construction Impact (Section 5.5.5.10), Noise (Section 5.5.5.25), Safety and Security (Section 5.5.5.33), Vehicular Traffic (Section 5.5.5.41), and Vibration (Section 5.5.5.42). (1-1-28, 1)

**(1-5-28-1-84, 1):** And the expense that is one thing that has a lot to be concerned with and it seems to be what we're really more concerned about, like people, say, from Potomac Greens wanting to Potomac Yards. So why don't we just go to a much cheaper plan and build an over-the-street walkway for people coming from Potomac Greens into Potomac Yard area?

It just would make it easier for a lot of people to walk over these tracks and that would save a lot of money, I think, wouldn't it? So, well, I just would like to that to be considered.

**Response:** The Draft EIS, Section 1.3, describes the project's purpose and need, part of which is to provide a direct access point to the regional transit system within Potomac Yard. As described in Section 2.3, No Build Alternative, and Section 2.4, Build Alternatives, all project alternatives include a pedestrian/bicycle bridge with 24-hour access between the Potomac Greens and Potomac Yard neighborhoods. (1-5-28, 1)

### 5.5.5.32 Public Involvement

**(1-5-17-2-62, 1):** It would have been more appropriate if the selection of a preferred alternative was made after consideration of public comments. Not surprisingly, the staff decision coincides with an earlier agreement made with the developer regarding the location of the rail station. The announcement also unveiled recent side agreements with the National Park Service for protecting the parkway [...] The DEIS should be amended to include the tentative agreements so citizens can provide reasonable comments on the alternatives included in the DEIS but also on the new proposed deal.

**Response:** The City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015, following the comment period on the Draft EIS. All comments received on the Draft EIS have been reviewed by the City of Alexandria. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. The Final EIS will incorporate any new information affecting the project since the publication of the Draft EIS and will be released for public review. Any additional agreements made between the cooperating agencies will be included in the Final EIS and is required as part of the Record of Decision (ROD). Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-5-17, 2)

**(3-5-17-2-161, 44):** It would be useful if a description of future public outreach was presented in the NEPA document. Please state how the public will be informed about noise and vibration that may be caused by the project and communication on mitigation measures that will be developed.

**(3-5-17-2-161, 9):** Consider establishing a public communication plan in order to keep the public informed and attempt to reduce public frustration. This plan could include regular public meetings, emails, a hotline, and other notices.

**Response:** The Final EIS will include a description of future public outreach, including how information will be disseminated to affected parties regarding project effects, such as noise and vibration, and proposed mitigation measures for them. A public communication plan will be established, providing information on public meetings, email and telephone contacts, and other relevant information regarding project construction and design. Further detail regarding these project elements will be developed and presented in the Final EIS and/or later design phases and provided to agencies and stakeholders, as appropriate. (3-5-65, 2)

**(1-5-17-8-118, 1):** I think the City has an obligation to completely address the questions and concerns raised by citizens here tonight. I expect them to do so and not just hold a hearing that can then be ignored.

**Response:** The project team will respond to all comments received by May 18, 2015. These comments and responses will be included in the Final EIS and also in the WMATA Public Hearing Staff Report that will be issued for public review as part of the agency's separate process under the WMATA Compact. All comments received during the public comment period were reviewed by the City of Alexandria. (1-5-17, 2)

**(1-5-17-2-61, 1):** The DEIS and the alternative proposed have significantly changed since it was released for public comment on April 3. City and Federal officials have mutually agreed that only Alternatives A & B are financially feasible. In addition, the National Park Service has given notice it would not object to the City's preferred alternative (Alternative B), and they have reached agreement on a package of land trades and the City would commit \$12 million to protect the Mount Vernon Parkway. In effect, the recently announced agreements have negated the DEIS currently out for public comment.

I ask that the following steps be taken:

1. The DEIS be amended to incorporate the new information dramatically changing the alternatives being considered and the measures for mitigating impacts to the Parkway.
2. The Mayor or City Manager make a public announcement on terms of a proposed agreement with the National Park Service and other cooperating Federal agencies.
3. The City Staff delay announcing their preferred alternative until after they have considered comments from citizens.
4. The City provide more detailed information on the proposed agreement with the National Park Service and the commitment of \$12 million for improvement of the Mount Vernon Trail and Daingerfield Island; and other parkway needs.

5. The City provide more information on construction access through the Potomac Green neighborhood and proposed limits on construction traffic.

The City staff's selection of a preferred site prior to the deadline for comments is an attempt to derail public involvement and limit consideration of other alternatives.

**(1-5-17-1-85, 1):** The DEIS and the alternative proposed have significantly changed since it was released for public comment on April 3. City and Federal officials have mutually agreed that only Alternatives A & B are financially feasible. In addition, the National Park Service has given notice it would not object to the City's preferred alternative (Alternative B), and they have reached agreement on a package of land trades and the City would commit \$12 million to protect the Mount Vernon Parkway. In effect, the recently announced agreements have negated the DEIS currently out for public comment.

I ask that the following steps be taken:

1. The DEIS be amended to incorporate the new information dramatically changing the alternatives being considered and the measures for mitigating impacts to the Parkway.
2. The Mayor or City Manager make a public announcement on terms of a proposed agreement with the National Park Service and other cooperating Federal agencies.
3. The City Staff delay announcing their preferred alternative until after they have considered comments from citizens.
4. The City provide more detailed information on the proposed agreement with the National Park Service and the commitment of \$12 million for improvement of the Mount Vernon Trail and Daingerfield Island; and other parkway needs.
5. The City provide more information on construction access through the Potomac Green neighborhood and proposed limits on construction traffic.

The City staff's selection of a preferred site prior to the deadline for comments is an attempt to derail public involvement and limit consideration of other alternatives.

**Response:** 1. The Final EIS will incorporate any new information affecting the project since the publication of the Draft EIS and will be released for public review.

2. Any additional agreements made between the cooperating agencies will be included in the Final EIS and are required as part of the Record of Decision (ROD).
3. As the lead local agency, the City of Alexandria can select a preferred alternative at any point during the NEPA process. The City of Alexandria selected Build Alternative B as the Preferred Alternative following the closure of the public comment period on the Draft EIS. All comments received on the Draft EIS have been reviewed by the City of Alexandria.
4. Any additional agreements made between the cooperating agencies will be included in the Final EIS and are required as part of the Record of Decision (ROD).
5. The Final EIS will provide more information on construction access and traffic. Further details of the mitigation measures will be developed during the final design phase of the project when details of the project components and the construction scenarios are finalized and a Transportation Management Plan (TMP) will be developed. The TMP will address construction activities related to the project as well as permanent station operations and will be prepared in coordination with VDOT, the City of Alexandria, and other agencies as applicable. (1-5-17, 47)

### 5.5.5.33

### 5.5.5.34 Safety and Security

**(1-5-5-2-159, 1):** Regarding the Proposed Potomac Yard Metro Station, we are concerned about the following issues [...]

5) Decrease in the overall security of the affected areas of Potomac Greens. Please explain how security will be maintained at current levels.

**Response:** Regarding safety and security: The Draft EIS, Section 3.21, Safety and Security, describes measures used at Metrorail stations to create a secure environment for patrons. WMATA's Metro Transit Police Department will perform law enforcement and public safety services at the station, and the City of Alexandria Police Department will perform these services in the station vicinity. All comments received on the Draft EIS have been reviewed by WMATA and the City of Alexandria. (1-2-5, 1)

### 5.5.5.35 Shopping Center

**(1-5-36-1-78, 1):** And not only that, the report does not include the 28 -- the \$14 million that will be lost from the revenue that is currently generated from the sales taxes over at the Potomac Yard Shopping Center.

**(1-5-36-1-83, 1):** The EIS made reference to the existing Potomac Yard Shopping Center as consideration for the proposed station. Isn't that Center going to disappear? Isn't the movie theatre going to disappear? If not, when did that change?

Also, what is the yearly tax revenue that the city receives from the shopping center and the movie theatre? What will the city do to make up for that lost revenue when the shopping center disappears?

**(1-1-36-1-246, 1):** Finally, by converting the Potomac Yard Shopping Center into a very dense mixed-use development, we will lose much of the sales tax revenue from the shopping center, a regional destination that brings in about \$14 million annually to the City in taxes, money that is likely to continue as long as the shopping center exists.

We are told that the build out of the shopping center will bring all the revenue needed to pay for our wealthy infrastructure debt. I think that is unlikely but even if it were true, the debt is the debt of our city and the debt of all its taxpayers. Owing such a big debt will limit our ability to borrow for other things that will become necessary, another public school, another fire station, maybe even some more parkland.

But the biggest warning sign about Option B, the fact that cries out to me "stop this before it's too late," is the unenthusiastic attitude of the landowners of the shopping center. They have no plan to terminate any of their leases on the Yard early. They are attempting now to renegotiate their contribution to initial infrastructure costs. They even want to revise the Small Area Plan adopted in 2010. If these investors really believed, as the proponents of Option B claim, that it will generate vast tax revenue for the City, would they not be hurrying to get the station built to rake in that money? This is like the canary in the coal mine. Why don't these people hanker for these billions -- millions that we're supposed to get with this build out? It's very frightening.

**Response:** The Draft EIS, Section 3.4 Land Use and Zoning, states the impacts of the Build Alternatives on surrounding uses, including the shopping center. Neither Build Alternative A nor Build Alternative B would displace the existing shopping center or movie theater. Under Build Alternative B, the northern station entrance would touch down on a portion of the shopping center parking lot that, in the future, is planned for redevelopment and open space as part of a dense mixed-use development incorporating a Metrorail station entrance.

The Draft EIS, Section 2.1, Local Planning Process, summarizes City of Alexandria small area planning for North Potomac Yard, which includes the existing Potomac Yard Shopping Center. The City's adopted North Potomac Yard Small Area Plan envisions the replacement of the retail center with a high-density, transit-oriented neighborhood, including 7.525 million square feet of office, retail, residential, and hotel uses.

The Draft EIS, Chapter 5, discusses project costs and funding. The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria. Questions regarding City of Alexandria tax revenues should be directed to the appropriate City department. (4-1-36, 1)

### 5.5.5.36 Station Design

**(3-5-65-2-161, 35):** EPA supports evaluation and incorporation, as part of the build alternatives, design that can potentially reduce environmental impacts such as pervious surface, low impact development Best Management Practices (BMPs) for all aspects of the project, and low emissions equipment use during construction.

**Response:** The Draft EIS, Section 3.19, Sustainability, states that the station will be designed consistent with the local sustainability requirements. Station design features that comply with green building policies and objectives, such as LEED Silver Certification, would be developed during detailed design phases of the project. Low Impact Design (LID) features and other stormwater BMPs will also be considered and may include features such as grassed swales, bioretention cells/rain gardens, permeable pavement, infiltration trenches, sand and organic filters, inlet protection devices, and others to be defined during later design phases.

Project construction activities will consider the use of low-emission construction equipment where feasible. (3-5-65, 1)

**(1-5-65-7-151, 1):** 3) Proposed designs are obtrusive and ugly. More traditional designs like the original aboveground stations would harmonize better with proximity to GW Parkway.

**Response:** Regarding the station design and the impacts to the George Washington Memorial Parkway: The Draft EIS, Section 3.8.4, Mitigation, states that station building design and materials will be refined during later project phases in coordination with the National Park Service to mitigate impacts. (1-5-65, 1)

**(2-5-20-2-170, 1):** [...] 3.4.4 Land Use and Zoning-Mitigation

The DEIS notes that for Build Alternative B "preliminary analysis of the conceptual design has identified methods to reduce the height to meet current zoning requirements and that during preliminary engineering and final design further refinement would explore options to reduce the structure height to the extent possible." Should Build Alternative B be implemented the height of the station and associated structures should be reduced to the maximum extent possible, and not just explored as suggested within the DEIS. The station and associated structures, under Build Alternative B, appear to have the most negative environmental impacts on the GWMP; as such, minimization of their visual impact on the GWMP should be a key design goal.

**Response:** In regards to Section 3.4.4, the Final EIS will incorporate architectural design refinements, currently ongoing, that will adjust the station height relative to grade level consistent with City of Alexandria zoning requirements. Other design measures to minimize visual impacts of the station are currently under development. Key architectural design refinements will be incorporated in the Final EIS and its environmental evaluations. Additional minor refinements proposed for mitigation of project impacts will be specified in the Record of Decision.

### 5.5.5.37 Station Necessity

**(4-5-14-2-189, 1):** 9(f) Funding Plans. DRPT believes the project adequately addresses the Purpose and Need. DRPT notes that the "No-Build" alternative would not meet the Purpose and Need and agrees that traffic congestion would worsen significantly under this alternative. Additionally the Potomac Yard Metrorail station will be good for the economies of Alexandria, Northern Virginia, and the entire Commonwealth of Virginia. Investment in transit promotes economic development. According to the American Public Transit Association, \$1 in spending on transit returns \$4 in economic benefit and every \$1 billion spent on transit capital supports 16,000 jobs. Based on the DRPT SYIP costs, this project would generate 4,900 jobs and \$1.2 billion in economic benefit. The City's own economic impact analysis shows that the station will generate as much as \$2 billion in additional tax revenues which can support additional services and benefit residents above the cost of constructing the station. In January 2015, the Commonwealth Transportation Board approved a \$50 million loan from the Virginia Transportation Infrastructure Bank to the project. The project is estimated to generate between 9.3 million and 13.1 million square feet of development and anticipates receiving donated property for the station from developers as well as developer contributions and shortfall guarantees.

**Response:** Comment noted. (4-5-14, 1)

**(1-5-14-1-80, 1):**

[...] the Draft EIS states that, The project is proposed to improve local and regional transit accessibility to and from the Potomac Yard area. Do we really need more options in addition to the following that already exists?

WMATA buses Metro Way, DASH, the Reagan Metro stop, the Braddock Metro stop, Capital Bikeshare, Zip Car, taxi services, Uber, and others, too many to name. How much is enough.

**(1-5-14-1-90, 1):** Since then, we've experienced every combination of getting from Point A to Point B in the metro area. We believe that the multiple means to get around make a metro station rather unnecessary. Any time I wish to catch a metro train, I have several ways to rapidly and cheaply get to Braddock Road.

Our Homeowners' Association even provides a rush hour shuttle service to the station as they're required to do something with money set aside for transportation funding from our fees. So from our perspective, why a Metro?

**Response:** The Draft EIS, Section 1.3, describes the project's purpose and need, part of which is to provide a direct access point to the regional transit system within Potomac Yard. (1-1-14, 1)

### 5.5.5.38 Station Ridership

**(1-5-59-2-175, 1):** Contradictory statements and statistics occur throughout the document, such as:

1) in 2040 forecast ridership for Alternative B is 11,300 on line 209 and 13,200 on line 4185. This is significant, as the table 3-2 shows small difference between ridership for AltA (10,000) and AltB (11,300).

**Response:** The Draft EIS, Section 3.2 Transportation (includes Line 209), reports 2040 forecast station ridership for the Build Alternatives with the base level of new development in Potomac Yard that would be allowed under the No Build Alternative. Section 3.23, Secondary and Cumulative Effects (includes Line 4185), reports 2040 forecast station ridership with the additional level of new development in Potomac Yard that would be allowed under adopted City plans and zoning if a station is located in the vicinity of the Build Alternative B location. (1-5-59, 1)

### 5.5.5.39 Support General

**(1-5-26-2-13, 1):** I am definitely in favor of the City pushing forward in this and begin construction.

**(1-5-26-2-16, 1):** I am a D.C. resident writing in strong support of a new Potomac Yard metro station. I believe infill metro stations help our region economically and environmentally in important ways and it deserves our funding and support.

I believe that combining residential and commercial development with access to the metro is a powerful tool to fight rising housing prices and sprawl that leads to long commutes and more pollution.

I hope that the project moves forward as quickly as is practicable.

**(1-5-26-2-18, 1):** I am an Alexandria resident strongly in favor either of the two most preferred options.

For those opposed to any development along these lines, my comment is: The best way to view that his plan is maximizing density and development that are already in Potomac Yard. We have freight trains, planes, VRE, and Metro going right by Potomac Yard, along with the tracks and the noise already there, yet Potomac Yard residents and business are denied access to a metro stop.

It makes absolutely no sense. If we build the metro, better development will come in the likes that Potomac Yard has never seen. It is currently strewn with former warehouses and strip malls and if we don't do something, Alexandria, is missing a huge opportunity to create a vibrant neighborhood that will become desintation, like Clarendon or Old Town, Sadly, but for the Movie Theater and Target, Potomac Yard is currently an area that people drive through. The Metro will make Potoamc Yard a place that people go to.

For those concerned that Route 1 will become more congested with cars, it's ALREADY bumper to bumper in the mornings. Having a metro option only increases the alternatives and provides an opportunity for thousands of drivers to get out of that traffic.

For those purportedly concerned about parklands and wetlands, I agree on the general concept of protecting those, but let's be real. This is an area that is bounded by railroad tracks, metro, VRE, planes flying overhead, and simply, already developed. Metro would compliment the existing development by linking the area up with all of the commerce that surrounds it and making the area a hub.

**(1-5-26-2-22, 1):** I live in the Potomac Yard neighborhood and I think the proposed Potomac Yard Metro stop will be a great addition to Alexandria.

**(1-5-26-2-61, 1):** The Potomac Yard property is underutilized and I support efforts to locate a metro rail station at Potomac Yard.

**(1-5-26-2-71, 1):** We support the build option for the Potomac Yard Metro Station.

**(1-5-26-1-91, 1):** We are very interested in seeing the Metro go in and we're very happy with what Alexandria is doing, in terms of the parks that just south of us on Potomac Avenue and what we'll be doing, in terms of the mixed-use development at the new Potomac Yard.

We understand that the shopping center that is there is not really going to be taken away, but there will be shopping areas still. I'm sure that's all to be determined yet. In opposition to what people have suggested her about worrying about the crime and the noise, we would, on the other hand, really like to see the Metro move closer to us. And the reason is, many of our residents are commuters, Metro commuters and the closest Metro is a mile away right now. So we would love to have, you know, we don't to walk eight-tenths of a mile to get on the Metro, when we're going towards D.C., we would go a mile to go into D.C. to Crystal City [...]

we would love to have the Metro move closer to us. Maybe there is a way Arlington would help out with that because the streetcar has been cancelled and maybe that money can go to help out. That's my suggestion.

**(1-5-26-8-123, 1):** I live in Arlington (Ballston) and support this project.

**(1-5-26-8-127, 1):** I support a build alternative.

**(1-5-26-2-203, 1):** We support the build option for Potomac Yard Metro Station, however we are also concerned with the increase in traffic that it will bring to E. Glebe Road [...]

We support the Metro station and economic activity that should accompany it [...]

In conclusion, we are in favor of the Metro Build option, however we also request the city allocate funds to manage the increase in traffic on E. Glebe Road that is expected, and which is predicted to be the single road most affected by the metro.

**(4-5-26-1-233, 1):** We plan to stay here a long time and we support the Metro because we believe it will help the entire area become more prosperous.

**(4-5-26-1-235, 1):** Like many neighbors, I support the concept of building a Metro Station but have serious concerns regarding the financing model.

**(4-5-26-1-238, 1):** For the record, we are strongly in favor of the Potomac Yard Metro project and will not seek to delay it in any way.

**(2-5-26-2-170, 1):** The proposed PYMS can be a positive component that contributes to the region's multi-modal transportation system, in particular due to its proposed location within an existing neighborhood and next to an area of Alexandria planned for high-density mixed-use development.

**(1-5-26-2-38, 1):** In addition, I strongly support aggressive expansion of Metro and light rail service across the Northern Virginia Metro area and encourage you to aggressively pursue expansion and funding for same.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria. The City considered a range of factors in its selection, including those resource areas and factors listed in the comments received as well as all other resources and factors evaluated in the Draft EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-5-26, 1)

#### 5.5.5.40 Support No Build Alternative

**(1-5-30-2-14, 1):** I am opposed to the construction of the Potomac Yard Metro Station. The impacts upon traffic in the area, affordability to local and future residents of the area and the environment are be too great to justify this project [...]

Local politicians never met a "redevelopment" they didn't like, for all they see are dollar signs, but the best interests of current residents should be kept in the forefront. The area can be well-served by the Crystal City Potomac Yard Transitway without suffering the impacts and negative externalities described above.

Finally, WMATA has already shown that it is incapable of operating a system within its existing network. To expand this in any way, as through the opening of new lines or stations, is not a wise course at this time. Fix the existing Metro system first, go more than a couple years without a major incident and then we'll talk.

NO TO POTOMAC YARD STATION!

**(1-5-30-2-20, 1):** I would vote for the no build option.

**(1-5-30-2-72, 1):** For all of these reasons, a Potomac Yards Metro stop is a bad deal for all except the developer, and should not be pursued. The "No Build" option is the wisest approach, since the BRT negates the need for a stop at this location.

**(1-5-30-1-75, 1):** I also spoke against the in-fill station at NoMA, calling it a bad idea whose time has come. That station had a cost estimate -- a cost overrun of something on the order of 30 to 40 percent, and there is no reason to believe that whatever alternative they choose, other than the No-Build Alternative, which is the right alternative to choose, will not have a cost overrun of at least that magnitude[...]

No new Metro station should be built with Metro at and beyond its design capacity.

**(1-5-30-1-87, 1):** As far as a Metro is concerned, I believe a no-build alternative would probably be the best alternative. [...]

I also have a number of issues with mitigation. I believe that that the GW Parkway should not be encroached on, as many other people have talked about.

I believe that the visual aesthetics of the George Washington Memorial Parkway should outweigh a majority of other reasons. Again, that's really all I have to say that I can think about right now, but I do stand for a no-build alternative. And if an alternative is considered-- a build alternative is considered that we think about the folks in the neighborhood and what this will do to commuter, as well as pedestrian density.

**(1-5-30-7-146, 1):** For these reasons, I prefer the No Build option.

The cost, both economically and environmentally, of the station does not bring enough benefit.

**(1-5-30-7-151, 1):** 1) WMATA reports Metrorail reached and exceeded its design capacity 10 years ago. No new metro station is justified which adds ridership to an overcapacity system unless the vast majority of net new riders are in the counterflow direction. Flow versus counterflow ridership needs to be calculated and reported related to the new metro station.

2) B-CSX is preferable by minimizing the loss of GW parkway lands / wetlands. Otherwise "No Build" is the second choice.

**(1-5-30-2-179, 1):** With regard to the Potomac Yard metro station issue, it appears that little or no attention has been given to the alternative for ensuring that potential Metro rail riders have economical access to their current Metro rail stations such as Crystal City, Braddock Road, etc. Rather, it appears the City of Alexandria preferred alternative appears to be construct the Potomac Yard Metro station then decide what needs to be done for economical citizen access to the nearest Metro rail station (s) [...]

It appears the City of Alexandria is jumping to the Potomac Yard Metro rail station conclusion [...]

Our local municipalities need to do better than than the proposed Potomac Yard Metro rail station (with its very limited alternatives analysis) and the canceled Arlington street car project.

**(4-5-30-1-246, 1):** If we must have a Metro, let's have A. Better yet, let's have no build. We have a very fine BRT which Arlington will connect to now that it's given up on street cars. It's a very fine modern state-of-the-art what the future lies in BRT because it's so much less expensive and it can be built so much more quickly and for much less investment.

**(1-2-30-2-53, 1):** As a taxpayer and a voter in the City of Alexandria I am opposed to building a new metro station on any portion of our already threatened and irreplaceable park land.

**(1-5-30-1-88, 1):** And as we are talking about a no-build option, perhaps, it's possible to consider it and to take some of the money that we're considering for this Metro station and put it into Alexandria City schools.

**(1-5-30-1-245, 1):** I am speaking in favor of the no build option. This Metro Station Plan B is a Metro Station built on hope, and hope is an iridescent phantom that flies through the night but disappears with the dawn, with the first ray of sun. The Metroway Bus Rapid Transit is a first class service. When the full infrastructure is built in Arlington County, this service, over time, will come to be recognized as the high-quality bus rapid transit that it is and it obviates the need for a Metro station. This -- you are paying a penny for this Bus Rapid Transit and it will, over time, give you a dollar of value. Don't throw away this wise investment that you have made to chase the foolish idea of a Metro Station.

This Metro Station is not about not about transportation. It does not benefit me. It delays my commute into town because where the Metro now goes 60 miles an hour through that area, it would have to stop. It detracts me. This Metro Station is about development. IT is not about transportation and when the WMATA – and when WMATA started to look at development, that's when WMATA took its wrong turn and its service quality started to decline because it stopped paying attention to its primary job.

VRE, for example, objected to BCSX which is a wise compromise if you must have a Metro Station because it gives to the people who are wary of this development less of it, because staff thinks that you'll get some developer contribution and we know the developers don't want to contribute much, and we can look around and see that with teleworking and all these other things that are happening, the demand for office space might not be as great.

So by having the BCSX compromise, you can hedge the danger that you get a huge development of the Metro Station that you can't pay for in the long run, that the developers run in and say "give us residential instead of commercial" and you're not going to tell them no. We know that. So what this does is it reduces the size of the development. It reduces the disruption. You don't need park land for BCSX and if, as in Arlington, there is a political revolt against the development, this kind of compromise is more likely to be a more enduring one than your preferred B option that you seem set upon. Thank you.

**(4-5-30-6-232, 1):** I come here as one of the representatives of the Potomac Yard Special Tax District Committee for Tax Fairness. As such, I'd like to present this petition, a work in progress which has over 220 signatures as part of your outreach. I'd also like to recognize my neighbors in attendance who could hold up their hands, many of whom will be speaking here today. I have a very brief statement to read.

Our form of government is an example to others. Being council members at large provides you with the advantage of not being beholden to the particular interest of a narrow minority but rather to think of the bigger picture. This privilege also demands a higher level of self- scrutiny and attention to fairness for all. I'm here to tell you that the bigger picture isn't the success or failure of the Metro project. The Metro is important, maybe even vital to the economic health of Alexandria, but more important than what you achieve is how you achieve it. The Metro is not to be gotten at all costs.

We citizens of Alexandria, residents of Potomac Yard are certainly willing to do our part. What we are not willing to do is be the sole Alexandria residents to shoulder an access taxation burden above and beyond property taxes, above and beyond the builder contributions of Pulte which have been passed on to us in the purchase price of our homes.

This is not the American way. This is not the way you want to build the Metro. This is not how things are done in a democracy. Our form of government is an example to others. Singling out a few hundred taxpayers to bear the financial burden that others would not, the burden of building public infrastructure that is intended to revitalize and bolster the economic viability of an entire town, we humbly request that you immediately put up for consideration the elimination of the single family contribution to the tier two special tax district and limit it instead to only include commercial and multi- family properties. Thank you.

**(4-5-30-6-244, 1):** You know, at ever staff briefing I attended on the Potomac Yard Metro Station, the staff described the four alternatives. Of course, now they are reduced to two, Alternative A which will cost 209 million which is adjacent to Potomac Greens, and Alternative B which is calculated to be 268 million, very close to the Potomac Yards Mall but also on a scenic easement owned by the National Park Service.

Neither location will be outfitted with a Kiss & Ride lot so potential riders must walk to these locations. This is going to be difficult for some, especially the handicapped.

The City has stated repeatedly that the Potomac Yard Metro project will result in no cost to the City General Fund and that the funding will come from the developer contributions, grants from regional, state, and federal sources, special tax district revenues and new tax revenues generated from the overall development.

However, this hasn't been the case. Recently, Virginia has agreed to loan, not grant, Alexandria 50 million and developers will only contribute to the Metro if Alternative B is selected, which is beyond the pale. Unfortunately, the rest of these offsets are all too true. Residents and/or commercial interests located in two special tax zones within Potomac Yard will pay 10 to 20 percent more on their property taxes.

You know, if this Metro stop is so important to the economic welfare of this city, then everybody ought to chip in.

We do not condone the use of special tax zones. The City of Alexandria cannot continue to borrow, build, and hope, as so aptly described by my good friend, Bob Wood. This posture has put us half a billion dollars in debt, more to follow, with a \$66 million annual debt service starting next year.

Instead of the erstwhile zero sum game being tied up by the City for these Metro alternatives, it would be far more helpful to understand the exact funding requirements for each year, both Alternatives A and B, to include a detailed breakout of the funding services that will be used to satisfy each requirement. As an example, next fiscal year, Alexandria's contribution to WMATA is going to cost an additional \$3 million out of the General Fund resulting in a payment of 23 million. In future years, the proposed Metro stop will require additional subsidies for Metro so this must be factored in and will -- as will a loan from Virginia.

Rather than resorting to smoke and mirrors, total transparency is needed when discussing funding for this Metro stop and other developments, which is tagging onto what Mr. Chapman was saying about the numbers a little bit earlier.

It's estimated that a total of 13,000 new residents will move into the 7,100 newly built units in Potomac Yard and they will be commuting to work somewhere. Additionally, 26,000 new jobs will be situated within Potomac Yard's area. Essentially, this adds up to an additional 40,000 individuals entering and exiting the Yard on a daily basis less, of course, the number of lucky new residents that snag a job within a walking distance. If only half of the projected population uses Metro which has its own issues, as we know, then the other half would drive or take the BRT or the bus rapid transit. In this case, Route 1 will encounter backups all the way to the District of Columbia. To counter this, the traffic will seek an alternative route using Commonwealth Avenue which is exactly what the original traffic plan envisioned. All of this traffic will occur whether or not there is a Metro stop in Potomac Yard.

Since the BRT is currently devoid of passengers, there's only hope that the ridership will increase and in the not too near future. If the Metro stop at Potomac Yards is not built, it is one way to fulfill the promise of the BRT buses. Moreover, the BRT is justification enough for the no build option for the Potomac Yard Metro stop.

The Environmental Impact Statement was released on 27<sup>th</sup> of March to the public. The National Park Service, WMATA, the Federal Transit Administration, and the City of Alexandria area all involved in the EIS process. Regretably the Park Service has caved into the demands of the City. This means that despite the fact that the City owns Alternative B land, the National Park Service has a Green Scenic easement on the same land which will they will recede to the City for construction of the Metro stop.

In addition, no commercial vehicles are presently allowed on the Parkway without a special exemption granted by the Superintendent of the National Park Service. So will Alexandria seek an exemption to allow truck and construction equipments to operate on the already congested Parkway. If this dispensation is given by the National Park Service, what additional construction impact will incur to the parklands, especially the demolition of numerous 20 to 70 year old majestic trees. Unfortunately, the alternative haul routes would adversely impact the residents of Potomac Greens and other surrounding neighborhoods. For all these reasons, the Potomac Yards Metro stop is a bad deal for all and should not be pursued. The no build option is the wisest and the BRT negates the need for a Metro stop at that location. Thank you so much.

**Response:** Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. The City of Alexandria's factors for the selection of the preferred alternative are detailed in the City's *Staff Recommendation for the Preferred Alternative*, which is available on the City's website ([www.alexandriava.gov/PotomacYard](http://www.alexandriava.gov/PotomacYard)). All comments received on the Draft EIS have been reviewed by the City of Alexandria. The City considered a range of factors in its selection, including those resource areas and factors listed in the comments received as well as all other resources and factors evaluated in the Draft EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-2-30, 1)

#### 5.5.5.41 Taxes

**(4-5-21-6-232, 1):** I come here as one of the representatives of the Potomac Yard Special Tax District Committee for Tax Fairness. As such, I'd like to present this petition, a work in progress which has over 220 signatures as part of your outreach. I'd also like to recognize my neighbors in attendance who could hold up their hands, many of whom will be speaking here today. I have a very brief statement to read.

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This is not the American way. This is not the way you want to build the Metro. This is not how things are done in a democracy. Our form of government is an example to others. Singling out a few hundred taxpayers to bear the financial burden that others would not, the burden of building public infrastructure that is intended to revitalize and bolster the economic viability of an entire town, we humbly request that you immediately put up for consideration the elimination of the single family contribution to the tier two special tax district and limit it instead to only include commercial and multi-family properties. Thank you.

**(4-5-21-6-244, 1):** The City has stated repeatedly that the Potomac Yard Metro project will result in no cost to the City General Fund and that the funding will come from the developer contributions, grants from regional, state, and federal sources, special tax district revenues and new tax revenues generated from the overall development.

However, this hasn't been the case. Recently, Virginia has agreed to loan, not grant, Alexandria 50 million and developers will only contribute to the Metro if Alternative B is selected, which is beyond the pale. Unfortunately, the rest of these offsets are all too true. Residents and/or commercial interests located in two special tax zones within Potomac Yard will pay 10 to 20 percent more on their property taxes.

You know, if this Metro stop is so important to the economic welfare of this city, then everybody ought to chip in.

We do not condone the use of special tax zones. The City of Alexandria cannot continue to borrow, build, and hope, as so aptly described by my good friend, Bob Wood. This posture has put us half a billion dollars in debt, more to follow, with a \$66 million annual debt service starting next year.

Instead of the erstwhile zero sum game being tied up by the City for these Metro alternatives, it would be far more helpful to understand the exact funding requirements for each year, both Alternatives A and B, to include a detailed breakout of the funding services that will be used to satisfy each requirement. As an example, next fiscal year, Alexandria's contribution to WMATA is going to cost an additional \$3 million out of the General Fund resulting in a payment of 23 million. In future years, the proposed Metro stop will require additional subsidies for Metro so this must be factored in and will -- as will a loan from Virginia.

Rather than resorting to smoke and mirrors, total transparency is needed when discussing funding for this Metro stop and other developments, which is tagging onto what Mr. Chapman was saying about the numbers a little bit earlier.

**Response:** Regarding financing for the project: The Draft EIS, Chapter 5, discusses project costs and funding. The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria. The Final EIS will be updated to reflect any changes regarding the financing for the project adopted as of the time of its preparation. (4-5-9, 1)

**(1-5-21-2-13, 1):** I am definitely in favor of the City pushing forward in this and begin construction. Having said that, we have heard that as a PY Resident we are in a special 20 cent tax district that will kick in after the metro is built, but Potomac Greens residences on the other side of the tracks are not being assessed anything additional. I'm sure this isn't true and would like verification.

I looked at the options for the station and all seem to have a walkway to Potomac Greens just like to PY. I can't imagine one neighborhood would be taxed and the other not as that would make sense if one neighborhood did NOT have direct walkway access to the station [...]

I hope this moves forward but that taxes are levied fairly to all who benefit not just residents who happened to not be living here yet to voice their opinion at the time the City determined this.

**(1-5-21-2-22, 1):** I understand that a portion of the funding will come from a new property tax for the Potomac Yard neighborhood but not the Potomac Greens Neighborhood. Any new property tax needs to be applied equitably for all neighborhoods who will benefit from this new Metro. If the Potomac Greens neighborhood is not going to pay additional taxes, then there should not be a bridge connecting the Metro to the Potomac Greens neighborhood.

**(1-5-21-2-59, 1):** The City should not pay -- and City taxpayers should not pay -- extra costs to move the Metro Rail station from the 1970's location to a site more profitable or the Potomac Yards property owners.

The entire City of Alexandria will benefit from having a Potomac Yard Metro Rail Station at the location agreed in the 1970's. Building some loop-de-loop rail squiggles to get the station to a profitable location for the Potomac Yard property owners will slow down Metro Rail transit for everyone else. Efforts by the City to usurp Nation Park lands will fail and will delay getting a station. Over time, the attractiveness of having a Metro Rail Station in service at this long-planned location will lead to changes in the use of the surrounding lands and all will eventually work out.

The City of Alexandria does not have a proud record on this issue. The City can at least stop playing games, stop trying to usurp NPS lands to which it has no right, and stop trying to spend money it does not have. Build the station where it was planned in the 1970's, as soon as possible. The City should have required the developers of lands near the station to fund its construction in advance; having failed that, any special tax district to fund station construction should be limited to the immediate area that will profit from the construction of this long-overdue infrastructure addition to the City.

**(1-5-21-2-72, 1):** The City has stated repeatedly that the Potomac Yard Metro project will result in “no costs” to the City’s General Fund, and that funding will come from developer contributions, grants from regional, state and federal sources, special tax district revenues, and new tax revenues generated from the overall development. However, this has not been the case. Recently, Virginia has agreed to loan (not grant) Alexandria \$50 million, and developers will only contribute to the Metro if Alternative B is selected, which is questionable. Unfortunately, the rest of these offsets are all too true - residents and/or commercial interests located in the two special tax zones within Potomac Yard will pay 10 to 20 percent more on their property taxes. Has this been conveyed to them as they rent and/or buy housing in these districts?

The City of Alexandria cannot continue to “borrow, build, and hope”. This posture has put us a half billion dollars in debt (and more to follow), with a \$66 million dollar debt service. Instead of the erstwhile zero sum game being touted by the City for these Metro alternatives, it would be far more helpful to understand the exact funding requirements for each year (both alternatives A and B) to include a detailed breakout of funding sources that will be used to satisfy each requirement. As an example, next fiscal year, Alexandria’s contribution to WMATA is going to cost an additional \$3 million out of the General Fund, resulting in a total payment of \$23 million. In future years, the proposed Metro stop will require additional subsidies for Metro, so this must also be factored in, as will the loan from Virginia. Rather than resorting to smoke and mirrors, total transparency is necessary when discussing funding for this Metro stop, and other such developments. What we do know is that the debt service on Alternative B alone is \$14 million. When added to the aforementioned overall debt service will result in a total debt service of \$80 million.

**(1-5-21-1-233, 1):** Mayor and Council, over the last three weeks, our committee has been able to meet with every Council member concerning the current special tax district our community has been placed in [...]

No matter the words, emotions, or frustration shared about the decision to burden us with this special tax, please now that we all appreciate your dedication to this City, your commitment to our communities and your tireless efforts to make our lives better [...]

We feel there must be a better way to solve the current geographical taxing dilemma and ask you to consider modifying the existing tier two portion of the special tax district to apply only to commercial properties in the area. We have presented our case to each of you and my colleagues will now present facts to support our positions. Please consider words with an open mind to help us find a better solution.

**(1-5-21-1-234, 1):** While we, in our community, generally support the idea of building the Metro, we find that either Option A or Option B brings with it a fundamental problem which is the tier two portion of the special tax district. And we have generally two reasons for believing that way. One, we actually question if the tier two portion of the STD is legal. In a recent memorandum, the City Manager defended that it’s legal to tax us because we are obtaining a special benefit and that the tax is being applied uniformly in our area.

If you look at that map with the walking distance, the same map you have ahead of you, if you apply the City’s own standard to measure benefit, which is to be within a distance of a half a mile from the proposed station, two-thirds of our area will not meet that criteria. We are within three-quarters of a mile or more and yet we are the only one being taxed by the City.

So we ask of you do we really benefit from Option B to a point of being specially taxed? Also, how can it be legal to cherry pick and play favorites by choosing to tax only us when if you look at the map, you will see other residential areas of the City within a half -- a quarter of a mile not being taxed, in Potomac Greens, in Del Ray but not in Potomac Yard.

So even if it was legal, is it fair? Is this the kind of policy that City Council wants to apply in the City?

Second, we also believe that the criteria chosen by the City to discriminate between residents is not objective. If the decision back in 2011 was to impose the tax only on known preexisting properties, then it was not applied objectively. There were several houses in Potomac Greens, Del Ray built or renovated after that and they will never be taxed under the current rules. So, it also doesn’t bear any relationship with the (inaudible) this state.

As Mr. Jinks correctly pointed out in his memorandum last week, most special tax districts created in Virginia have been established to apply to existing developer property. By choosing this route, Alexandria is setting a bad precedent not only for the City but for the region.

So bringing back to today, is the tier – if the tier two portion of the special tax district is to remain, we must say that we are not in a position to validate the preferred alternatives selected by the City. We actually have reasons to believe that Option A would be cheaper, closer to us and as such, might depend less on our income. Now, if the City really wants to pursue Option B, which we believe and understand it's the best option for the City, we ask of you either one, to go back to the table and change the special tax district to include all residential areas within the radius that's been proposed and shown in that picture, or, which we believe is the most obvious and perhaps logical way to pursue this aspect, which is to apply it only to multi-families and commercial properties, particularly capturing new developments coming out in the region such as the Oakville Triangle development, and this will be consistent with what was done in Fairfax and other areas of the Silver Line.

**(1-5-21-1-235, 1):** Like many neighbors, I support the concept of building a Metro Station but have serious concerns regarding the financing model [...]

The current proposition of a special tax district is unfair and sets a horrible precedent for the City. Based on the memo by the City Manager that's been referred to, the establishment of the district was legal based on the process taken. But does legal process equal fair and equitable application to all citizens? In this case, the answer is definitively "no."

As my neighbors have pointed out, two-thirds of the single family residents in the tier two district are not even on your map. We had to add an addition in order to show them. None of the homes within the quarter-mile radius are being taxed. Many homes on the outer area of the district, including my own, are just as close to the Braddock Station and, therefore, a new station provides no unique additional benefit.

But we will be financially hurt or seriously strained by this additional tax. For single, first-time home buyers such as myself who had to use a VA loan in order to even be able to afford in the City of Alexandria, 10 percent increase on top of increased assessments is not a small impact.

There are several valid reasons for the City Council to reopen the discussion on this tax district. The factors to determine the financial model in 2011 have changed. In 2011, decisions were based on broad-sweeping views of this project but now four years later, you, as Council, have additional information, additional resources, additional commercial tax bases that are well within the half-mile radius and are ahead of the pre-build funding due to the 2-1/2 year delay. Most importantly, you're no longer planning to tax a land bay but actual neighbors of yours and citizens of the City.

In almost every piece of press coverage, there is a consistent tag line that I'm assuming is coming from your PR team and that is that you are building this without taxing Alexandria's citizens. But the truth is that you're putting this on the backs of 416 households that were only singled out because they weren't there to fight it like the neighborhoods like Potomac Greens were. So the claim to that -- your claim to fame right now is a false pretense.

As a result, before you vote on the 20th, we propose a caveat be connected to either build option, that you will remove the single family residents from tier two tax district. This decision is not just a Potomac Yard issue. It is a decision that impacts every single citizen in Alexandria. This approach sets a precedent and message to all the City's citizens. Several of you said -- I'm almost done -- you were not willing to make any changes to the area because, quote, "I will do nothing to put this project at risk." Proceeding with the vote to build without changing the tax for these households presents a statement to the community at large that you are willing to get projects done at any cost, even if it means sticking it to voters and citizens.

During a meeting, several of you have stated that you weren't on the Council when the special tax district was established in 2011 but you are now. A vote based on the staff recommendation is a vote supporting the current financial model, so the decision that will be linked to this City Council and a part of your legacy. A vote to build without making caveats is a vote to support this tax structure. You will be culpable. So what precedents do you want to set? What do you want your legacy to be?

We implore you to please limit the special tax district to commercial and multi-family businesses only. Thank you.

**(1-5-21-1-236, 1):** Because of the City Council's arbitrary decision to single out our community and only our community to pay a very substantial extra 10 percent additional tax every year for 30 years to fund the Metro Station at Potomac Yard, I'm certainly now questioning my decision to move to what I thought was a great city.

On July 8th, 2010, the Washington Post reported that a special tax district was created at Potomac Greens in 1999, before the homes were built. Homeowners say that tax district places an unfair burden on them. The at the time Deputy City Manager, Mark Jinks, said the reason for taxing only neighborhoods within a 1-1/2 mile radius from the Metro stop is because residents in those areas would most benefit. Mr. Jinks also stated that the City would look at other options other than what they had specifically proposed as far as rate, timing, and boundaries.

On May 26, 2011, the Washington Post reported that Potomac Greens will not be included in the special tax district to support the construction of the Potomac Yard Metro Station. Mr. Jinks was quoted as saying "there is a real question of fairness." He also stated that money could be found in project cost savings or city, state or federal funding and in the grand scheme of things, it's a fairly small amount of money. Apparently, it did not take the City long to come up with a plan to replace the funds that would no longer come from the community that is closest to the proposed Potomac Yard Station and would benefit the most.

On June 28th, 2011, the Patch reported that the Alexandria City Council approved an ordinance creating a special tax district for the area surrounding the proposed Potomac Yard Metrorail Station and that the Potomac Yard Metrorail Station's special services district does not include Potomac Greens or Old Town Greens.

I submit the one reason Potomac Yard is ultimately designated to pay this unfair tax is because no one lived here at the time and, therefore, there was no one there to defend us.

So the City has gone from a plan taxing everyone one within a one-half mile radius of the station to just the Potomac Yard community where the vast majority of our residents live beyond that one-half mile radius. In the history of the Metro system, no private property owners in all of Northern Virginia have ever paid an additional tax for a metro station including the Silver Line which is currently being constructed.

The City Council must reverse this unfair egregious decision and completely remove Potomac Yard residents from the special tax district as they did for Potomac Greens and all other private property owners who will benefit equally or more from the presence of this Metro Station. Not only is the special tax unfair, it will harm the residents of Potomac Yard by adversely affecting the resale value of our properties. Any perspective purchaser who wants to live in the area of Potomac Yard Metro Station will be well aware of the additional burden of paying tens of thousands of dollars in extra taxes if they purchase in our community vice any of the other surrounding neighborhoods. A great city would not discriminate against a very small segment of its residents and cause them such harm just because they are the newest residents.

City Council must right this horrific wrong. We implore you to limit the special tax district to commercial only.

**(1-5-21-6-237, 1):** Thank you, Mayor. Thank you, members of the Council. My name is Adrienne Lopez and I stand here before you today as a member of Potomac Yard Special Tax District Committee for Tax Fairness. I am also an appointed member of the Alexandria Sister Cities Commission, a Rotarian, and a new resident of Alexandria along with my husband, Rafael Lima. We're excited to be here.

I work in an international financial institution that has built many large Metro projects in Latin America, and we only provide loans for these projects if certain conditions are complied with related to the process and policies of our organization, especially as it relates to consultation with affected parties. Meaningful consultation and the principle of transparency are key elements to guarantee that all stakeholders' comments and feedback are incorporated into the design and implementation of projects.

To the extent that you ask us to take part of the financing of this Metro as one of the two special tax districts, we then deserve a higher degree of meaningful consultation which should include outreach and meeting specifically with the residents of Potomac Yard on this issue. This seems to be the minimum a city should offer given that we have been uniquely and unjustly targeted to pay this special tax, and I commend Councilman Chapman for bringing up the issue recently on the outreach techniques.

In Section 2.0 of the Community Input of this document, Potomac Yard residents are only mentioned once as one of the nine community groups that met with the staff. This section highlights concerns received through public outreach including the financial feasibility related to the Metro yet nothing is included in this Section of the document from the 200-plus residents of Potomac Yard that have sent emails, letters, and a petition over the past two months regarding the unfairness of the tier two of the STD, as we call it, and our interest to be treated equally alongside other communities such as Potomac Greens and Del Ray.

In Appendix C of the same document related to feedback on impacts of alternatives, we want to bring your attention that there is no mention of the comments we have shared with you both publicly and privately in some of the meetings we've met with you on as it relates to the taxes being levied through this STD and the financial viability of Option A or B.

Finally, the staff recommendation in this same document says that additional comments received during -- following the release of this report will be included as a separate attachment to the City Council prior to their decision on the preferred alternative. So please let the minutes of this meeting and this hearing reflect all of our comments and public participation as a key stakeholder in this process including the speeches today, the petition that was presented, and our request to Council that you motion to eliminate the single-family contribution to the tier two special tax district and limit it instead to only include commercial and multi-family properties.

**(1-5-21-1-238, 1):** Our goal is to bring forth an equitable status for the residents of Potomac Yard who currently find themselves alone in the tier two special tax district that would otherwise be normally defined by geographic boundary or some other equitable democratic carving out of the district.

We request that you immediately deliberate, vote on, and adopt one of the other options listed below that we've talked about today. Redefine the tier two district to include all neighborhoods within some walking distance that also share in the benefit and -- or to remove us from the tier two district as we've done for other communities. We implore you to limit the special tax district to commercial avenues only.

**(1-5-21-1-239, 1):** I'd like to start my comments by noting the very eloquent statement of the honorable Potomac Greens resident. It was pointed out to us that Potomac Yard is different from Potomac Greens in that Potomac Yard owners bought their houses knowing about the future development of Metro whereas Potomac Greens had no knowledge of Metro. This very subject was brought up in a couple of our informal meetings and a very informal meeting with the Mayor and staff and staff raised this very issue.

(Inaudible) but one about how to defeat this argument was the extraordinary eloquent statement of the Potomac Greens resident which I wish could be read back word-for-word. Quote, "I bought my house with the very promising outlook for a Metro Station. This will increase home values and spur development." I think this puts a stake in the heart of that there's a difference between Potomac Yard and Potomac Greens.

Mr. Jinks, with all due respect, both communities should be treated equally and I believed you expressed those sentiments a number of years ago. We wish you would return to those sentiments and cordially, kindly implore you and really the City Council to do so. Thank you.

Mr. Mayor, City Council, we also thank you for requesting the just released May 15th Jinks study of Potomac Yard financing. We implore the City Council to read the subtext context and meaning of the Jinks memo for what it contains, what it doesn't contain, what it infers and what it -- what the true meaning of it is.

First, it is very, very, very subtly put but it's right there. Please note the interchangeable nature of the Potomac Yard and Oakville Triangle funding stream. Based on City Manager projections, they are equivalent. You'll notice on the chart, Potomac Yard funding comes out at roughly 500,000 per year in the excess property tax. Oakville Triangle, which is closer to the Metro and whose sole marketing or the marketing is mainly based on Metro accessibility, comes out roughly in a one-sentence line, roughly 300,000 to 500,000.

You notice also the difference, one's on a chart and one's in the body and the Potomac Yard contains a lot more narrative for whatever reason.

The report is solely also a forecast about Metro. It's silent on the affect of the tax on the community. That's another good point because we estimate that the per household contribution is to be at least \$800.00 to \$1,000.00 per person. This is not a small amount to each and every family member in the Potomac Yard community and it's counterintuitive to the development of the Potomac Yard community.

The study does not address the less money the community would have to spend on retail, groceries, local services, which is the very nature of what the City Council is trying to spur the development of -- tax the local residents more than non-local residents but tax the local residents more than the even closer residents of Potomac Greens -- why is construction happening in Potomac Greens? It's because they're closer to where the Metro station is -- but incentivize retail to serve the local residents who have less money to keep the retailer growing concern.

We also have great, great concerns that we're going to be taxed out of our own neighborhood. If you notice the chart, the tax has a step-up increase of three percent each year in the tax according to City Management and Planning figures. We have many military, many federal workers, many state workers, many teachers and local workers that live in our neighborhood. We're only 200 families strong but we're growing and we'll be over 400 families strong.

There's only been a one percent increase year-by-year in COLAs whereas merit raises have been generally flat, so we're getting a three percent step-up increase per year whereas year- by-year funding for our own take home pay and salaries have been flat. We respectfully urge you to notice the disconnect and the delta.

**(1-5-21-1-240, 1):** When we bought our home, we were aware of the potential special tax district to fund partially the construction of the new Metro Station. The understanding was that this new added tax was going to be applied to all residents that were benefitting from this new addition. We were warned and took notice and thought that if everyone was paying, then we were okay with that.

Almost by accident, not long ago, we found out that only about 300 Potomac Yard homes were going to be paying this extra tax. From the City's own account, there are several residents who will be benefitting as well from the station, not to mention the new commercial development, Oakville Triangle, which is less than half a mile away but has not been included in this district.

We see this not only as an unfair tax because it is discriminatory but also because we're paying for this Metro Station three times. Let me explain. First installment, Pulte, as the developer of our neighborhood, was required to contribute for this new station as part of the developer contributions. As we all know, they were not paying out of the goodness of their hearts nor from their own bank account. This contribution was directly attached to the value of our homes. So basically, we paid for it when we bought our homes, not to mention the beautiful park that everyone enjoys and the Route 1 Bridge as well.

Second installment, special tax district. Only us, about 300 residents, are supposed to be paying approximately 10 percent more for over 30 years on taxes to help the City fund this station.

Third installment. Our assessment value was -- will randomly go up once the Metro is running increasing our taxes even more so. As Potomac Yard residents, we see our assessment values already above the market value which is not the case for most Alexandria residents. Of the approximately 100 townhomes sold this year in one of the Alexandria zip codes, only 15 percent of those had a recorded assessed value higher than the actual market value.

We ask you to please stop this bleeding and that you limit the special tax district to commercial properties only.

**(1-5-21-1-241, 1):** My family was particularly impressed by the democratic process of how the project is being proposed to the public and the numerous public hearings, like this one, the City has hosted to gather public feedback. My father commented that this is the American way. Only in a true democracy would the city place such importance of hearing from the public.

I paused at his comment. I could not, and in fact I was ashamed to tell him that a small group of citizens, my husband, Robert, and I included, were being targeted to carry an extra financial burden, not through a democratic process as we were not here in 2011 to lend our voices but in absence here, not seen and therefore not spoken for.

My neighbors and colleagues here have adequately presented to you with facts, precedence, logic, financial options, and legal considerations as to why the residential part of the special tax district is unfair and unjust.

I ask you to view this not just as a Metro stop project. This is a once-in-a-lifetime opportunity for you, for the Council members, to put your stamp on the future of the City. You have worked so hard to put this project forward. You obviously care a great deal about the City.

Why would you allow such an insignificant yet grossly ill-conceived element within the funding structure to pollute an otherwise landmark victory? I plead you to right the wrong. I wholeheartedly believe that you can and you will turn this into a perfect story that I will be proud to share with my family back in a country where democracy is not taken for granted. Please take action and move now to exclude the residential properties from the tier two special tax district.

**(1-5-21-1-242, 1):** Mr. Mayor and Ms. Vice Mayor, Council Members, my name is Anthony Estricko, resident of Potomac Yard, and I just want to say that I stand behind what my neighbors have said and I feel they've driven the points home [...]

And if it will benefit all of us, why should only some of us have to carry that burden? We implore you to limit the special tax district to commercial only. And just one other note. I've heard you all speak of Del Ray, about your city. Which one of you is the representative from Potomac Yard?

All of us yet none of us. None of you are residents of Potomac Yard to my understanding. It's a new community. The tax was placed before any of us occupied the space. We ask you to see that as the future of Alexandria and see it as the future that will benefit all those that travel through it, and the only way to do that is to do that in a fair way that everyone that reaps the benefits pays for those benefits.

**(1-5-21-1-249, 1):** We need commercial office space because it brings in a -- it enhances our tax base and moves it away from residential. To the extent that the Metro would support that in the long-term I think is a very important thing. If there isn't going to be the office, I mean Council needs to stand up and tell future councils. You can't -- you have to stand by getting that office and commercial. If you just build a townhome community, this is way too expensive a Metro to have a townhome community living next to it.

Now finally, coming down to the taxes. I remember going to the meetings and oh, well, we're going to pay for this by taxing the people who aren't here yet essentially. They were not at the meetings and I know that everybody who lived in Del Ray was happy to hear that their taxes weren't going to go up. But strictly speaking, I think that there is a question of fairness with respect to this tier two tax and in the spirit of the EIS, which had to consider a wide range of alternatives, one of the alternatives that's not considered in here is well, if we did spread this out across the City, how much are we talking about. Now is it a penny? What are we adding to this property taxes if we spread it across the City? And that alternative is not considered and I think, really, to be fair

**Response:** Regarding financing for the project: The Draft EIS, Chapter 5, discusses project costs and funding. The City of Alexandria is responsible for funding project capital costs and its annual WMATA operating subsidy. All comments received on the Draft EIS have been reviewed by the City of Alexandria. The Final EIS will be updated to reflect any changes regarding the financing for the project adopted as of the time of its preparation. (1-1-7, 1)

### 5.5.5.42 Vehicle Traffic

**(1-5-7-2-65, 1):** We are concerned about the lack of provision for any kiss & ride. While we understand that the station is assumed to primarily serve those within walking distance, and that the Potomac Yards area is being densely developed, Alexandria is still not the kind of urban environment that is downtown DC. Spouses headed to work, one in a car, and one on the metro, even if they live a short distance away, might well kiss and ride. People with mobility issues that may be able to navigate the handicap accessible pedestrian walkways, but not an additional hike from their residence, would value a kiss and ride. People traveling to the airport who are juggling luggage and / or young children would value a kiss and ride option.

If there is no provision for kiss & ride at the Potomac Yards entrance, we are concerned that our neighborhood, with its quiet streets and minimal traffic, might become a de facto kiss & ride location, (even over Braddock Road).

**(1-5-7-1-87, 1):** I have a number of concerns with the build alternatives and I guess the most important one is a walkway at the most northern end of our neighborhood that will certainly cause a lot of issues with traffic density. I believe that we'll have to probably get parking permits for our vehicles. Obviously, anyone that has Google Maps will know that the east side of the train tracks, the best place to Kiss and Ride, will be our neighborhood. The Potomac Greens area, the Old Town Greens area, Potomac Crossing will certainly be impacted to a huge degree on Slater's Lane as well.

**(1-5-7-8-126, 1):** The city needs to control non-resident access to Potomac Greens so that the neighborhood during rush hour.

**(1-5-7-2-159, 1):** Regarding the Proposed Potomac Yard Metro Station, we are concerned about the following issues [...]

4) Parking in Potomac Greens, particularly near the intersection of Potomac Greens Drive and Carpenter Road. Please explain how traffic and unauthorized parking will be controlled in this area.

**Response:** The Draft EIS, Section 3.2.3, discusses the potential impacts of a new Metrorail station at Potomac Yard on area traffic conditions. The station is projected to generate low levels of vehicular trips similar to other urban stations; however, these additional trips resulting from the project Build Alternatives would have no effect on overall intersection Level of Service (LOS) in the study area compared to the No Build condition. Near the Potomac Greens neighborhood, the analysis included the Portner/Potomac Greens Drive and Slaters Lane intersection (the ingress/egress intersection to Potomac Greens). AM peak hour LOS is projected to be LOS A for the No Build and Build conditions in both 2016 and 2040. PM peak hour LOS is projected to be LOS A for both the No Build and Build conditions 2016 and LOS B for both the No Build and Build conditions in 2040.

As noted in your comment, some of these additional vehicular trips may use local neighborhood streets to access the station for passenger drop-offs and pick-ups. Although these additional trips are not expected to degrade overall roadway and intersection LOS, they may be noticeable on streets that currently have very low traffic volumes. The introduction and enforcement of parking restrictions, including time limits and residential permitting, would largely avoid and minimize the impacts of Metrorail patrons attempting to park along public streets in adjoining neighborhoods. The City of Alexandria is responsible for planning traffic improvements and pedestrian accommodations at specific locations in the neighborhoods surrounding the proposed station location. All comments received on the Draft EIS have been reviewed by the City of Alexandria. Additional traffic calming measures may be considered during later project phases. (1-2-7, 1)

**(1-5-7-2-71, 1):** We support the build option for the Potomac Yard Metro Station; however, we are also concerned with the increased traffic that it will bring to E. Glebe Rd.

The draft EIS predicts that E. Glebe Rd will carry 34% of the vehicular traffic going to the new metro rail station, which is almost twice the metro traffic of any other road [Ref 1]. The EIS traffic study suggests this will change the East-bound traffic rating of the E. Glebe – Rt 1 intersection in the first year of operation from a 'D' in the 'No-Build' Alternative to an 'F' in the 'Build' alternative [Ref 2]. The study states, "...the eastbound approach experienced a substantial LOS downgrade..." Specifically, the average delay per vehicle is supposed to more than double from 52 seconds/vehicle to 136 seconds/vehicle in the first year the station is built [Ref 2]. Traffic is then expected to further increase each year the metro is in service, and would be further exacerbated if the Oakville Triangle project proceeds as proposed. The Draft EIS Study shows that the metro will cause traffic to increase more on E. Glebe Rd than on any other road, and that the E. Glebe – Rt 1 intersection is the only intersection predicted to have an overall rating of 'E' in 2040 (E is defined as unstable flow / Intolerable delay) [Ref 3].

Our primary concerns with the increased traffic are: being able to safely cross E. Glebe Rd, being able to safely get into our cars parked on the street, and being able to safely pull out onto E. Glebe from our alley. We support the metro station, but would like to encourage the city to include some sort of traffic calming option to maintain current speeds on E. Glebe Rd, and to improve the safety getting into and out of parked cars. Potential options may include addition of a curb-cut to better define the parking lane, addition of a bike lane to increase separation between parked cars and traffic, addition of a speed sensitive traffic light, etc.

In conclusion, we are in favor of a metro 'Build' option. However, we also request the city include funds to mitigate the increase in traffic that is expected on East Glebe Rd, and which is predicted to be the single road most affected by the metro.

**(1-5-7-1-92, 1):** The one concern, I guess I would have is East Glebe Road is already busy. I understand overall traffic is projected to go down; however, with locally, the traffic would likely go up on East Glebe with more people going to the Metro. And I don't want to add any large costs to the project, but just a consideration of gee, can you do speed bumps or some sort of traffic mitigating measure to maintain traffic on East Glebe? Similar sort of concern with parking, you know, parking restriction, similar to what they have at Braddock with three-hour blocks.

**(1-5-7-8-127, 1):** I support a build alternative. However while overall it will reduce traffic, locally traffic on E. Glebe will increase. Living on E. Glebe Rd, I would encourage additional traffic control measures on E. Glebe Rd. (Speed bumps...)

**(1-5-7-2-178, 1):** We support the build option for the Potomac Yard Metro Station; however, we are also concerned with the increased traffic that it will bring to E. Glebe Rd.

The draft EIS predicts that E. Glebe Rd will carry 34% of the vehicular traffic going to the new metro rail station, which is almost twice the metro traffic of any other road [Ref 1]. The EIS traffic study suggests this will change the East-bound traffic rating of the E. Glebe – Rt 1 intersection in the first year of operation from a 'D' in the 'No-Build' Alternative to an 'F' in the 'Build' alternative [Ref 2]. The study states, "...the eastbound approach experienced a substantial LOS downgrade..." Specifically, the average delay per vehicle is supposed to more than double from 52 seconds/vehicle to 136 seconds/vehicle in the first year the station is built [Ref 2]. Traffic is then expected to further increase each year the metro is in service, and would be further exacerbated if the Oakville Triangle project proceeds as proposed. The Draft EIS Study shows that the metro will cause traffic to increase more on E. Glebe Rd than on any other road, and that the E. Glebe – Rt 1 intersection is the only intersection predicted to have an overall rating of 'E' in 2040 (E is defined as unstable flow / Intolerable delay) [Ref 3].

Our primary concerns with the increased traffic are: being able to safely cross E. Glebe Rd, being able to safely get into our cars marked on the street, and being able to safely pull out onto E. Glebe from our alley. We support the metro station, but would like to encourage the city to include some sort of traffic calming option to maintain current speeds on E. Glebe Rd, and to improve the safety getting into and out of parked cars. Potential options may include addition of a curb-cut to better define the parking lane, addition of a bike lane to increase separation between parked cars and traffic, addition of a speed sensitive traffic right, etc. Additionally, we are concerned with the increased parking demand in the area and would suggest implementing zoned parking. We would also recommend having only one zone for both Lynn Haven and Del Ray neighborhoods since they often overlap with regards to parking [...]

Ref 1: Figure 1-3 (pg 10) of the Transportation Technical Memorandum dated 2/2013

Ref 2: Tables C-3 to Table C-12 (pg C-18) of the Transportation Technical Memorandum dated 2/2013

Ref 3: Tables 3-1 and Table 3-2 (pg C-16) of the Transportation Technical Memorandum dated =/2013

**(1-5-7-2-203, 1):** We support the build option for Potomac Yard Metro Station, however we are also concerned with the increase in traffic that it will bring to E. Glebe Road. It is safe to say that without your expert intervention and planning, E. Glebe Road cannot cope with this traffic increase safely and effectively.

Our primary concerns with the increased traffic are:

- Being able to safely cross E. Glebe Road
- Being able to safely get in / out of cars on E. Glebe Road
- Being able to safely merge into/off of E. Glebe Road

We support the Metro station and economic activity that should accompany it. But we would like to ask the city to consider including some traffic control and calming measures to:

- Maintain safe speeds on Glebe
- Improve safety on Glebe

Potential options for this may include: Speed humps, speed-control traffic light, roundabout at the intersection of Glebe/ Montrose, and more.

In conclusion, we are in favor of the Metro Build option, however we also request the city allocate funds to manage the increase in traffic on E. Glebe Road that is expected, and which is predicted to be the single road most affected by the metro.

**Response:** Regarding vehicle traffic along East Glebe Road:

Regarding vehicle traffic along East Glebe Road, as discussed in Section 3.2.3 of the Draft EIS, a new Metrorail station at Potomac Yard would not have an adverse effect on overall traffic conditions in the study area, as defined by a decrease in overall intersection Level of Service (LOS). However, as referenced in the comments, the eastbound approach of the East Glebe Road and U.S. Route 1 intersection would be expected to have a decrease in its LOS as a result of the project, although the overall intersection LOS would not change. The City of Alexandria is responsible for planning traffic improvements and pedestrian accommodations at specific locations in the neighborhoods surrounding the proposed station location. All comments received on the Draft EIS have been reviewed by the City of Alexandria. As part of its ongoing citywide traffic management and pedestrian programs, the City of Alexandria will monitor conditions along streets in the station vicinity during later project design phases and after the project opening. Through these periodic reviews, the City will determine if measures, such as traffic calming, are needed to address any issues associated with vehicular trips to the station.

The Draft EIS, Section 3.2.3.2, notes that the introduction and enforcement of parking restrictions, including time limits and residential permitting, would largely avoid and minimize the impacts of Metrorail patrons attempting to park along public streets in adjoining neighborhoods. (1-2-7, 2)

**(1-5-7-1-83, 1):** The EIS mentions traffic congestion on Route 1 and that the new Metro station will help pull cars off the road. The question is how can that be the case when the cars on Route 1 are actually going through the area on the way to Washington, D.C., Pentagon and Crystal City.

**Response:** The Draft EIS, Section 2.5.3.3, describes the increased share of transit and other non-auto trips as a result of the project build alternatives, and Section 3.2.3.2 describes the effect of the project build alternatives on traffic conditions. (1-3-18, 1)

**(1-5-7-2-157, 40):** In regard to the direct impacts from traffic the DEIS states, "The three Build Alternatives and B-CSX Design Option would have no effect on overall intersection LOS in the study area when compared with the No Build condition". (Page 3-17) The DEIS also states, "The three Build Alternatives and B-CSX Design Option would have no adverse effect on any transportation resource, so no mitigation is proposed." (Page 3-19) The DEIS indicates the alternative would have both indirect and cumulative impacts on traffic. However, the analysis of both types of impacts completely inadequate. On page 3-11, the DEIS states, "traffic that may be generated by potential induced development occurring as a result of a new Metrorail station is discussed in Section 3.23 Secondary and Cumulative Effects". This section describes the secondary traffic impacts, as in vague terms as a minor increase in "peak-period trips" (page 3-196) and the cumulative impacts on traffic "...would be improved mobility and accessibility to accommodate the City's projected growth".

In summary, the DEIS concludes that that the proposed action would not result in adverse direct or indirect impacts on traffic and there would be a beneficial cumulative impact on traffic. This analysis appears to be completely off base.

In the last 30 years the quality of life in the Northern VA and Alexandria area has suffered dramatically due to the rampant and uncontrolled development and the resulting increase in traffic. This is the 'affected traffic environment' that the DEIS needs to describe.

The DEIS describes how development is projected to increase in the near future and the DEIS describes how this proposed action will contribute to the development, further decreasing the quality of life in the area. The increase in traffic may be the most significant adverse impact of the proposed action on the local population and yet, the DEIS describes the net impact as beneficial? This assessment would be more believable if the proposed action was to construct a metro station that would not result in any new development to the area. However, the DEIS is clear that development is an integral part of the proposed action and therefore the impacts from development must be analyzed and described in the DEIS.

The traffic impacts on the quality of life are just the impacts that Congress and the President intended to be addressed when the NEPA became law, "...recognizing the profound impact of man's activity on the interrelations of all components of the natural environment, particularly the profound influences of population growth, high-density urbanization,...and recognizing further the critical importance of restoring and maintaining environmental quality to the overall welfare and development of man, declares that it is the continuing policy of the Federal Government, in cooperation with State and local governments, and other concerned public and private organizations, to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans.... fulfill the responsibilities of each generation as trustee of the environment for succeeding generations; assure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings; attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences; achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities". (National Environmental Policy Act of 1969)

FTA and NPS have a responsibility under the NEPA to describe the affected "traffic" environment and to describe the direct, indirect, and cumulative impacts of the project on traffic.

31. Please describe the affected environment for traffic and provide a meaningful description of the direct, indirect, and cumulative impacts of the project on traffic.

**Response:** The affected environment for traffic is described in detail in the Transportation Technical Memorandum (Appendix 4 Volume II of the Draft EIS). Direct traffic impacts of the project are described in Section 3.1 of the Draft EIS. Indirect and cumulative impacts are described in Section 3.23. (1-5-7, 2)

**(1-5-7-2-28, 1):** I know that developers make money off of this, construction workers get jobs, and the city gains tax revenues but from a quality of life standpoint, it already seems overcrowded around here. The traffic is rotten and makes the daily transit experience be it as a driver, biker, or pedestrian (and I am all three) unduly stressful as we navigate our small city. For example, the city doesn't put sensors on traffic lights to keep traffic moving efficiently. I've lived in other place that do that, and it works!! There are no PSAs about how drivers should behave in traffic to keep traffic moving. Can't we get some traffic engineers to show people the ropes? As much of our population is transient, it would appear from the prevailing driving behaviors that many drivers just don't have a clue about that and could benefit from some public education. Does the city have any other plans for the increased tax revenue that will increase our quality of life around here? If so, I'd really like to hear what it is.

**(1-5-7-2-72, 1):** It is estimated that a total of 13,000 new residents will move into the 7,100 newly built units in Potomac Yard, and they will be commuting to work somewhere. Additionally, 26,000 new jobs will be situated within the Potomac Yard Area. Essentially, this adds up to an additional 40,000 Individuals entering and exiting the yard on a daily basis, less the number of lucky new residents that snag a job within walking distance. If only half of the projected population uses Metro (which has its own issues), then the other half would drive, or take the Bus Rapid Transit (BRT). In this case, Route 1 will encounter backups all the way to the District of Columbia. To counter this, traffic will seek an alternate route using Commonwealth Avenue, which is exactly what the original traffic plan projected. All of this traffic will occur whether or not there is a Metro stop in Potomac Yard.

**Response:** As discussed in Section 3.2.3 of the Draft EIS, a new Metrorail station at Potomac Yard would not have an adverse effect on overall traffic conditions in the study area. (1-5-7, 4)

**(1-5-7-4-149, 1)** No matter which alternative is chosen, the City must have a clause in the agreement that clearly states "no ingress or egress to the George Washington Memorial Parkway will be allowed ever"

**Response:** Regarding access from the George Washington Memorial Parkway: Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (1-5-7, 4)

**(1-5-18-1-80, 1):** The Fuels Institute, a non-profit, research-oriented think tank, founded by the National Association of Convenience Stores, dedicated to evaluating the market issues related to consumer vehicles and the fuels that power them, recently released a report indicating that the driving pool is saturated and that transportation demand has stabilized after a century of continuous growth.

The Draft EIS seems to indicate that a Metro station will remove cars from the roadways, when, in fact, it would appear that this is already being accomplished naturally. Was this data taken into account when developing the Draft EIS? [...]

**Response:** The Draft EIS, Section 3.2.1.2, Traffic Conditions, describes the methodology for assessing traffic conditions and potential effects of the project. (1-2-18, 1)

#### 5.5.5.43 Vibration

**(3-5-37-2-161, 2):** We suggest a vibration monitoring and mitigation plan be developed and shared with the public.

**(3-5-37-2-161, 6):** Consider the condition of surrounding buildings, structures, infrastructure and utilities, where appropriate; and whether any special protection is needed for historic properties.

**(3-5-37-2-161, 8):** Prepare contingency measures in the event established limits are exceeded. Consider steps to avoid generating noise/vibration from cumulative operations that may exceed noise limits.

**(3-5-17-2-161, 33):** EPA suggests that should major changes in vibration data arise during final design, or during vibration monitoring, the information be brought back before the public in some manner.

**(1-5-37-2-159, 1):** Regarding the Proposed Potomac Yard Metro Station, we are concerned about the following issues [...]

2) Increased vibration affecting the current residents of Potomac Greens. Please explain how this will be mitigated during both construction and operation.

**Response:** The Draft EIS was prepared in accordance with FTA and WMATA's noise and vibration requirements. FTA's vibration criteria take into consideration sensitive receptors for potential impacts. Measures to mitigate ongoing impacts due to project operations of the Build Alternatives are discussed in Section 3.12.4 of the Draft EIS. Section 3.24.4 (Lines 4918-4942) describes vibration impacts and minimization measures due to construction activities. During construction, the project will implement vibration control measures as discussed in Section 3.24.4.1 of the Draft EIS. Specific measures could include use of alternative equipment to reduce vibration, operating high vibration sources as far away from sensitive receptors as possible, vibration monitoring during construction, public notification programs to alert residents in advance of particularly disruptive activities, and complaint resolution procedures. No pile driving is anticipated, which will help minimize any vibration impacts from construction.

All mitigation measures for the Preferred Alternative will be specified in the Final EIS. At this stage of project design, further details regarding the levels, duration, and frequency of construction-related vibration are not available. Further details of the mitigation measures will be developed during the final design phase of the project, as appropriate, when the details of the project components and the construction scenarios are finalized.

The Final EIS will include a description of future public outreach, including how information will be disseminated to affected parties regarding project effects, such as noise and vibration, and proposed mitigation measures for them. A public communication plan will be established, providing information on public meetings, email and telephone contacts, and other relevant information regarding project construction and design. Further detail regarding these project elements will be developed and presented in the Final EIS and/or later design phases and provided to agencies and stakeholders, as appropriate.

With regard to cumulative operations, the site experiences existing ambient vibration from freight train operations, Metrorail pass-bys, and vehicular traffic. These existing sources were included in the vibration analysis.

Following the public comment period on the Draft EIS, the City of Alexandria adopted Build Alternative B with Option 2 Construction Access (no access from the George Washington Memorial Parkway) as the preferred alternative for the project on May 20, 2015. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. No permanent vibration impacts are anticipated from ongoing operation of the station under Build Alternative B. (3-5-37, 1)

#### 5.5.5.44 Water Quality

**(3-5-47-2-161, 14):** The design of the alternatives should incorporate storm water management treatment features that are placed in uplands and not in WOUS.

**(3-5-47-2-161, 18):** The project team should investigate opportunities to maintain or re-establish hydrology across the transportation system. If hydrology is impounded by barriers such as bermed areas in rail right-of-way, engineered breaks in the berm may be considered.

**Response:** Stormwater management treatment features will not be placed in WOUS to the extent feasible and will be developed in accordance with the U.S. Army Corps of Engineers and NPS requirements during the respective permitting processes.

Existing hydrology in the study area has been modified over the years by various transportation improvements that have occurred since the early twentieth century, including construction of the Potomac Yard rail yard and the George Washington Memorial Parkway and later alterations to the railroad tracks for the current alignments of the CSXT line and the Metrorail Blue/Yellow Line. The current hydrology will be restored in accordance with the U.S. Army Corps of Engineers and NPS requirements during the respective permitting processes. (3-5-37, 2)

**(3-5-47-2-161, 50):** The document should include an analysis of how the alternatives will potentially impact water quality.

**Response:** The Draft EIS, Section 3.13, Water Quality, states that although additional impervious surface and runoff would result from Build Alternative B, the project would adhere to water quality performance management criteria set by the City of Alexandria in accordance with Sec. 13-109 § (5) of the City Zoning Ordinance, which control the rate and water quality of stormwater runoff. These existing stormwater criteria and management practices in the City of Alexandria would minimize potential impacts from increases in impervious surface. No water quality impacts for the Build Alternatives in comparison to the No Build Alternative are anticipated. (3-5-37, 3)

#### **(4-5-47-2-188, 1): ENVIRONMENTAL IMPACTS AND MITIGATION**

8. Public Water Supplies. Project impacts and mitigation on public water supplies are discussed in the Draft EIS as part of section 3.22 on utilities (sections 3.22 .3 and 3.22.4, pages 3-193 and 3-194). Any of the "build" alternatives would require re-routing of existing and planned water lines to accommodate project components (section 3.22.3.2, page 3-194).

B(a) Agency Jurisdiction. The Virginia Department of Health's Office of Drinking Water (VDH-ODW) reviews projects for the potential to impact public drinking water sources (groundwater wells and surface water intakes).

B(b) Findings. VDH-ODW's findings on the proximity of the project to public drinking water sources (groundwater wells, springs, and surface water intakes) are as follows:

- There are no public groundwater wells within a 1-mile radius of the project site.
- There are no surface water intakes within a 5-mile radius of the project site.
- The project is not within Zone 1 (up to 5 miles into the watershed) of any public surface water sources.
- The project is not within Zone 2 (more than 5 miles into the watershed) of any public surface water sources.

B(c) Conclusion. According to VDH-ODW, there are no apparent impacts to public drinking water sources from the proposed project.

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

**Response:** Comment noted. The project will comply with federal, state and local regulations and permitting requirements relating to surface waters and wetlands. Project designs and specifications for these elements will be developed during detailed design phases and will be coordinated with all applicable agencies. (4-5-47, 1)

**(4-5-47-2-185, 1): ENVIRONMENTAL IMPACTS AND MITIGATION**

5. Wetlands and Water Quality. The Draft EIS discusses environmental consequences for wetlands and water quality in the sections on water quality (sections 3.13.3 and 3.13.4, pages 3-165 to 3-166), waters of the United States (sections 3.14.3 and 3.14.4, pages 3-168 through 3-174), floodplains (sections 3.15.3 and 3.15.4, pages 3-176 to 3-178), and navigable waters and the coastal zone (sections 3.15.3 and 3.15.4, pages 3-179 to 3-181).

5(a) Agency Jurisdictions.

5(a)(1) DEQ's Division of Water Quality Programs. The State Water Control Board (SWCB) promulgates Virginia's water regulations, covering a variety of permits to include Virginia Pollutant Discharge Elimination System 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 federal Clean Water Act § 404 permits for dredge and fill activities in waters of the U.S. The VWPP Program is administered by the Office of Wetlands and Stream Protection (OWSP), within the DEQ Water Division.

5(a)(2) Virginia Marine Resources Commission. The Commission (MRC), pursuant to Virginia Code sections 28.2-1200 et seq., has jurisdiction over any encroachments in, on, or over any state-owned rivers, streams, or creeks in the Commonwealth. MRC also serves as the clearinghouse for the Joint Federal-State Permit Application (JPA) used by the:

- VMRC for encroachments on or over state-owned subaqueous beds as well as tidal wetlands;
- U.S. Army Corps of Engineers (Corps) for issuing permits pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act;
- DEQ for issuance of a Virginia Water Protection Permit; and
- The appropriate local wetlands board for impacts to wetlands. See "Regulatory and Coordination Needs, item 5(a)(ii) below.

5(b) Comments. DEQ's Northern Regional Office (DEQ-NRO) states that based on the information provided, the project may affect streams or wetlands. If it does, a Virginia Water Protection Permit may be required from DEQ. See "Regulatory and Coordination Needs," item 5, below.

5(c) Recommendations. DEQ-NRO recommends that the project proponents avoid surface water impacts, or minimize unavoidable impacts to the best of their ability. DEQ-NRO also recommends that the proponents consult with the Army Corps of Engineers. See "Regulatory and Coordination Needs," item 5, below.

5(d) Other Water Quality Impacts. DEQ-NRO reminds the project manager that all authorizations relative to water quality impacts from point sources and non-point sources should be obtained. (For non-point source pollution control, see item 2, above.) See "Regulatory and Coordination Needs," item 5, below.

**(4-5-47-2-196, 1): REGULATORY AND COORDINATION NEEDS**

5. Wetlands and Water Quality.

5(a) Coordination.

5(a)(i) Virginia Water Protection Permits. Questions regarding the applicability and requirements for Virginia Water Protection Permits may be directed to DEQ's Northern Regional Office (Bryant Thomas, telephone (703) 583-3843 or e-mail Bryant.thomas@deq.virginia.gov).

5(a)(ii) Subaqueous Lands Encroachment Permits. As mentioned above ("Environmental Impacts and Mitigation," item 5(a)(2)), the Marine Resources Commission has permitting responsibilities for encroachments on state-owned subaqueous lands, and coordinates the water resources application process. Permit application forms, known as Joint Federal-State Permit Applications (JPAs), may be obtained from the Marine Resources Commission (telephone (757) 247-2200).

5(a)(iii) Additional Consultation. As indicated above ("Environmental Impacts and Mitigation," item 5(c)), DEQ's Northern Regional Office recommends that the project proponents consult with the Army Corps of Engineers, Norfolk District, regarding possible federal permitting needs associated with waterway and/or wetland impacts (begin with Tom Walker, telephone (757) 201-3657).

5(b) Authorities. Water resources permitting takes place pursuant to federal and state laws and regulations, including but not limited to the following:

- Federal Rivers and Harbors Act, section 10 (Corps of Engineers permits)
- Federal Clean Water Act, section 404 (same)
- Virginia Code Title 28.2, sections 28.2-1200 et seq. (Marine Resources Commission encroachment permits)
- State Water laws, Virginia Code sections 62.1-44.15:20 et seq. and state water regulations at 9 VAC 25-210-10, along with Clean Water Act section 401 govern Virginia Water Protection Permits.

**Response:** Comment Noted. The Final EIS will include any additional information related to wetlands and water quality permits if applicable. The project will comply with federal, state and local regulations and permitting requirements relating to surface waters and wetlands. Project designs and specifications for these elements will be developed during detailed design phases and will be coordinated with all applicable agencies. (4-5-47, 2)

**(4-5-47-2-211, 1):** VDH- Office of Drinking Water has reviewed the above project. Below are our comments as they relate to proximity to public drinking water sources (groundwater wells, springs and surface water intakes). Potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the local utility.

There are no public groundwater wells within a 1 mile radius of the project site.

There are no surface water intakes located within a 5 mile radius of the project site.

The project is not within Zone 1 (up to 5 miles into the watershed) of any public surface water sources.

The project is not within Zone 2 (greater than 5 miles into the watershed) of any public surface water sources.

There are no apparent impacts to public drinking water sources due to this project.

**Response:** Comment noted. The project will comply with federal, state and local regulations and permitting requirements relating to public water distribution systems or sanitary sewage collection systems. Project designs and specifications for these elements will be developed during detailed design phases and will be coordinated with all applicable agencies. (4-5-47, 3)

#### 5.5.5.45 Wetlands / Waters of the U.S.

**(3-5-60-2-161, 3):** The document should address how the project's alternatives conform to the Chesapeake Bay Executive Order 13508.

**Response:** EO 13508 states "to ensure that federal actions to protect and restore the Chesapeake Bay are closely coordinated with actions by state and local agencies in the watershed and that the resources, authorities, and expertise of federal, state, and local agencies are used as efficiently as possible for the benefit of the Chesapeake Bay's water quality and ecosystem and habitat health and viability".

FTA submitted a Federal Consistency Determination to the Virginia Department of Environmental Quality (VDEQ) Coastal Zone Management Program (CZMP) in December 2012 and submitted the Draft EIS to VDEQ in March 2015. VDEQ provided comments on the Federal Consistency Determination in January 2013 and for the Draft EIS in April 2015. The Federal Consistency Determination commits the project to a variety of actions related to consistency with Virginia's CZMP. The City of Alexandria will be responsible for implementing these commitments, which will include the issuance of a permit under Sections 401 and 404 of the Clean Water Act. The Final EIS will discuss these commitments and potential impacts associated with their implementation. (3-5-60, 1)

**(2-5-13-5-137, 1):** [...] the Commission requests careful consideration of mitigation efforts to minimize the permanent and temporary impacts to the wetlands. The Commission recommends that the land remaining in this important ecological area after construction of the Metrorail Station be improved by removing non-native trees and vegetation.

**Response:** Regarding wetland impacts: The Draft EIS, Section 3.14, Waters of the United States (Wetlands), describes potential impacts and identifies minimization and mitigation measures. All mitigation measures for the Preferred Alternative will be specified in the Record of Decision. Further details of the mitigation measures will be developed in accordance with NPS and USACE during the final design phase of the project when details of the project components and the construction scenarios are finalized.

The Final EIS will clarify that the project will comply with Executive Order 13112. As described in the Draft EIS, Section 3.18.4, the development and implementation of an Invasive Species Management Plan, which addresses the removal and management of invasive species, is proposed. The Plan will address restoration of vegetation cleared during construction and installation of permanent plantings used in landscaping and screening the station site, including, for example, ensuring that restoration plantings and seed mixes consist of native stock and are free and clear of invasive or noxious weeds. Further details regarding the Invasive Species Management Plan will be developed in compliance with EO 13112 and presented in the Final EIS or Record of Decision. (6-2-13, 1)

**(3-5-60-2-161, 11):** Page 3-170 states that BMPs would be installed to mitigate or improve water retention, etc. Please state the BMPs that are anticipated.

**(3-5-60-2-161, 16):** Table 3-51 presents "WOUS and Wetland Total". This heading is confusing since wetlands can be WOUS.

**(3-5-60-2-161, 4):** Page 3-37 describes the City of Alexandria's Master Plan Water Quality Management Supplement and implies that development can occur in wetlands. It should be noted that regulated WOUS must comply with Section 404 of the Clean Water Act, which includes avoiding and minimizing impacts to these resources.

**(3-5-60-2-161, 52):** Buffers should be maintained around aquatic habitats.

**Response:** With regard to water retention, the project will incorporate Low Impact Design (LID) features and other stormwater BMPs that may include grassed swales, bioretention cells/rain gardens, permeable pavement, infiltration trenches, sand and organic filters, inlet protection devices, and others to be defined during later design phases.

Regarding maintaining buffers around aquatic habitat: The Draft EIS, Section 3.14 assessed the project's impacts to Waters of the U.S., and Section 3.16 assessed the project's impacts to aquatic habitat buffers (Resource Protection Areas). NPS may also approve the use of regulated wetlands and floodplains on NPS land in accordance with Director's Orders 77-1 and 77-2, which establish the policies, requirements, and standards through which the NPS will meet its responsibilities to protect and preserve wetlands and floodplains. A Wetland and Floodplain Statement of Findings is currently being prepared by NPS in accordance with the Director's Orders, which will include measures to mitigate impacts to wetlands and floodplains. The Statement of Findings will be published with the Final EIS. The Final EIS will include any additional impacts and analyses on wetlands and Resource Protection Areas if applicable.

The terminology for WOUS in general versus wetland will be clarified in the Final EIS. (3-5-60, 2)

**(3-5-60-2-161, 51):** Additional efforts should be made to avoid and minimize aquatic impacts.

**Response:** Regarding impacts to aquatic habitat: The City of Alexandria adopted Build Alternative B as the preferred alternative for the project on May 20, 2015. Sections 3.14, 3.15, and 3.16 of the Draft EIS assessed the project's impacts to aquatic resources. The Final EIS will include any additional impacts and analyses if applicable. All mitigation measures for the Preferred Alternative will be specified in the Record of Decision. Further details of the mitigation measures will be developed in accordance with NPS and USACE during the final design phase of the project when details of the project components and the construction scenarios are finalized.

Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative. (3-5-60, 3)

**(3-5-13-2-161, 10):** Discussion regarding wetlands is unclear. The aquatic resource section should clearly explain the difference between National Park Service wetlands and U.S. Army Corps of Engineer wetlands. Also, wetlands, streams and other aquatic habitats could be waters of the United States (WOUS). The terms should be used properly in the EIS.

**Response:** The definitions and distinctions between National Park Service wetlands and U.S. Army Corps of Engineers wetlands and Waters of the U.S. will be reviewed and clarified in the Final EIS. (3-5-13, 1)

**(3-5-13-2-161, 12):** Page 3-174 indicates that it is not known if wetlands are tidal. A thorough assessment of natural resources should be included in the EIS to aid in the decision making for the selection of a preferred alternative.

**Response:** The *Water Resources Technical Memorandum* in Volume II of the Draft EIS provides additional information on the tidally influenced or non-tidal characteristics of the Waters of the U.S. within the study area. A thorough assessment of wetlands will be provided in the Statement of Findings as required by NPS in accordance with the Director's Order 77-1, and in the Final EIS. Further definition of wetlands will be conducted as needed during the permitting process in coordination with USACE, NPS, and state agencies. (3-5-13, 2)

**(3-5-13-2-161, 13):** The design should incorporate Low-Impact Development (LID) designs to further reduce potential impacts to the design corridor.

**Response:** The Draft EIS, Section 3.19, Sustainability, states that Build Alternative B will be designed consistent with the local sustainability requirements. Station design features that comply with green building policies and objectives, such as LEED Silver Certification, would be developed during detailed design phases of the project. LID may include features such as: bioretention facilities, permeable pavement, and others to be defined during later design phases. (3-5-13, 3)

**(3-5-13-2-161, 15):** Table 3-47 should include the wetland type and the total size of the wetlands.

**Response:** The Draft EIS, Section 3.14, describes the wetland type and total size of the wetlands. The Final EIS will more clearly reference this information. (3-5-13, 4)

**(3-5-13-2-161, 17):** Page 3-182 should refer the reader to the location of the wetland report.

**Response:** The report is contained in the Draft EIS, Volume II, *Water Resources Technical Memorandum*. The Final EIS will clearly reference the location of the report. (3-5-13, 5)

**(3-5-13-2-161, 19):** Additional information should be provided regarding a mitigation plan that will fully replace the functions and values of the wetlands proposed to be impacted.

**(3-5-13-2-161, 20):** The mitigation should be in the respective subwatershed and have a monitoring plan with physical, chemical, and biological success criteria. An adaptive management plan should also be created to address mitigation issues.

**Response:** Regarding wetland impacts: The Draft EIS, Section 3.14, Waters of the United States (Wetlands), describes potential impacts and identifies minimization and mitigation measures. NPS may also approve the use of regulated wetlands and floodplains on NPS land in accordance with Director's Orders 77-1 and 77-2, which establish the policies, requirements, and standards through which the NPS will meet its responsibilities to protect and preserve wetlands and floodplains. A Wetland and Floodplain Statement of Findings is currently being prepared by NPS in accordance with the Director's Orders, which will include measures to mitigate impacts to wetlands and floodplains. The Statement of Findings will be published with the Final EIS, and all mitigation measures for the Preferred Alternative will be specified in the Record of Decision. Further details of the mitigation measures will be developed in accordance with NPS and USACE during the final design phase of the project when details of the project components and the construction scenarios are finalized. (3-5-13, 6)

**(3-5-13-2-161, 46):** A functional assessment should be provided on the larger wetlands complexes that will be impacted and extend outside of the project corridor, as necessary. Additional information should be provided on the streams that will be impacted. The chemical, physical, and biological characteristics should be presented.

**Response:** NPS may also approve the use of regulated wetlands and floodplains on NPS land in accordance with Director's Orders 77-1 and 77-2, which establish the policies, requirements, and standards through which the NPS will meet its responsibilities to protect and preserve wetlands and floodplains. A Wetland and Floodplain Statement of Findings, which includes a functional assessment of wetlands, is currently being prepared by NPS in accordance with the Director's Orders, which will include measures to mitigate impacts to wetlands and floodplains. The Statement of Findings will be published with the Final EIS, and all mitigation measures for the Preferred Alternative will be specified in the Record of Decision. Further details of the mitigation measures will be developed in accordance with NPS and USACE during the final design phase of the project when details of the project components and the construction scenarios are finalized. The Final EIS will provide a more detailed functional assessment that will include any connections to larger wetland complexes outside the project study area. (3-5-13, 7)

**(1-5-13-2-14, 1):** And any development that impacts wetlands should be rejected out of hand. Wetlands are a source of sustenance and nurturing for wildlife, and they help to regenerate aquatic life and absorb floodwaters.

**(1-5-13-2-20, 1):** It is shameful to permanently impact wetlands. Wetlands are necessary to maintain water quality and quality of life. Man-made wetlands can never be true replacements for wetlands lost to man's construction.

**(1-5-13-7-148, 1):** As a resident of many years in Alexandria and a neighbor to the wetlands near Potomac Greens, the wetlands need to be protected and should be the top priority. There are not many spots like that left in this area (parks or green spaces are very different from wetlands with regard to their purpose and diversity of species). The wetlands should still be able to sustain life after this project is completed. Has any thought been given to expanding them as a mitigation measure.

**(1-5-13-2-175, 1):** Finally, it is troubling to see the persistence of "incremental loss" rearing it's ugly head. Wetlands and easements designed primarily for natural resource conservation are being sacrificed to urban sprawl.

**Response:** Regarding wetland impacts: The Draft EIS, Section 3.14, Waters of the United States (Wetlands), describes potential impacts and identifies minimization and mitigation measures. NPS may also approve the use of regulated wetlands and floodplains on NPS land in accordance with Director's Orders 77-1 and 77-2, which establish the policies, requirements, and standards through which the NPS will meet its responsibilities to protect and preserve wetlands and floodplains. A Wetland and Floodplain Statement of Findings is currently being prepared by NPS in accordance with the Director's Orders, which will include measures to mitigate impacts to wetlands and floodplains. The Statement of Findings will be published with the Final EIS, and all mitigation measures for the Preferred Alternative will be specified in the Record of Decision. Further details of the mitigation measures will be developed in accordance with NPS and USACE during the final design phase of the project when details of the project components and the construction scenarios are finalized. (1-5-13, 1)

**(4-5-13-2-185, 1): ENVIRONMENTAL IMPACTS AND MITIGATION**

5. Wetlands and Water Quality. The Draft EIS discusses environmental consequences for wetlands and water quality in the sections on water quality (sections 3.13.3 and 3.13.4, pages 3-165 to 3-166), waters of the United States (sections 3.14.3 and 3.14.4, pages 3-168 through 3-174), floodplains (sections 3.15.3 and 3.15.4, pages 3-176 to 3-178), and navigable waters and the coastal zone (sections 3.15.3 and 3.15.4, pages 3-179 to 3-181).

5(a) Agency Jurisdictions.

5(a)(1) DEQ's Division of Water Quality Programs. The State Water Control Board (SWCB) promulgates Virginia's water regulations, covering a variety of permits to include Virginia Pollutant Discharge Elimination System 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 federal Clean Water Act § 404 permits for dredge and fill activities in waters of the U.S. The VWPP Program is administered by the Office of Wetlands and Stream Protection (OWSP), within the DEQ Water Division.

5(a)(2) Virginia Marine Resources Commission. The Commission (MRC), pursuant to Virginia Code sections 28.2-1200 et seq., has jurisdiction over any encroachments in, on, or over any state-owned rivers, streams, or creeks in the Commonwealth. MRC also serves as the clearinghouse for the Joint Federal-State Permit Application (JPA) used by the:

- VMRC for encroachments on or over state-owned subaqueous beds as well as tidal wetlands;
- U.S. Army Corps of Engineers (Corps) for issuing permits pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act;
- DEQ for issuance of a Virginia Water Protection Permit; and
- The appropriate local wetlands board for impacts to wetlands. See "Regulatory and Coordination Needs, item 5(a)(ii) below.

5(b) Comments. DEQ's Northern Regional Office (DEQ-NRO) states that based on the information provided, the project may affect streams or wetlands. If it does, a Virginia Water Protection Permit may be required from DEQ. See "Regulatory and Coordination Needs," item 5, below.

5(c) Recommendations. DEQ-NRO recommends that the project proponents avoid surface water impacts, or minimize unavoidable impacts to the best of their ability. DEQ-NRO also recommends that the proponents consult with the Army Corps of Engineers. See "Regulatory and Coordination Needs," item 5, below.

5(d) Other Water Quality Impacts. DEQ-NRO reminds the project manager that all authorizations relative to water quality impacts from point sources and non-point sources should be obtained. (For non-point source pollution control, see item 2, above.) See "Regulatory and Coordination Needs," item 5, below.

**(4-5-13-2-196, 1): REGULATORY AND COORDINATION NEEDS**

5. Wetlands and Water Quality.

#### 5(a) Coordination.

5(a)(i) Virginia Water Protection Permits. Questions regarding the applicability and requirements for Virginia Water Protection Permits may be directed to DEQ's Northern Regional Office (Bryant Thomas, telephone (703) 583-3843 or e-mail Bryant.thomas@deq .Virginia .gov).

5(a)(ii) Subaqueous Lands Encroachment Permits. As mentioned above ("Environmental Impacts and Mitigation," item 5(a)(2)), the Marine Resources Commission has permitting responsibilities for encroachments on state-owned subaqueous lands, and coordinates the water resources application process. Permit application forms, known as Joint Federal-State Permit Applications (JPAs), may be obtained from the Marine Resources Commission (telephone (757) 247-2200).

5(a)(iii) Additional Consultation. As indicated above ("Environmental Impacts and Mitigation," item 5(c)), DEQ's Northern Regional Office recommends that the project proponents consult with the Army Corps of Engineers, Norfolk District, regarding possible federal permitting needs associated with waterway and/or wetland impacts (begin with Tom Walker, telephone (757) 201-3657).

5(b) Authorities. Water resources permitting takes place pursuant to federal and state laws and regulations, including but not limited to the following:

- Federal Rivers and Harbors Act, section 10 (Corps of Engineers permits)
- Federal Clean Water Act, section 404 (same)
- Virginia Code Title 28.2, sections 28.2-1200 et seq. (Marine Resources Commission encroachment permits)
- State Water laws, Virginia Code sections 62.1-44.15:20 et seq. and state water regulations at 9 VAC 25-210-10, along with Clean Water Act section 401 govern Virginia Water Protection Permits.

**Response:** Comment noted. The Final EIS will include any additional information related to wetlands and water quality permits if applicable. (4-5-47, 2)

#### 5.5.5.46 WMATA

**(1-5-18-7-151, 1):** 1) WMATA reports Metrorail reached and exceeded its design capacity 10 years ago. No new metro station is justified which adds ridership to an overcapacity system unless the vast majority of net new riders are in the counterflow direction. Flow versus counterflow ridership needs to be calculated and reported related to the new metro station.

**Response:** Regarding existing passenger crowding along the Metrorail Blue Line within Virginia during peak travel periods: Metro's Momentum strategic plan lays out recommendations to address Metrorail passenger crowding and other issues through the year 2025. (1-1-8, 2)

**(1-5-18-1-93, 1):** What I want to say is that after I've heard everybody speak, or most the people who were speaking, I haven't heard any comments about all of the people who will use this station who are coming from other parts of the area: coming from Huntington and so forth, or coming through the city who will see the new station but won't get off I'm thinking they're probably are not for this station because if they're coming through the city, they want to get to work, quickly and this new station will slow them down.

Now, we may not think that that would be a significant point, but for many people who use the Metro -- and I use it just about every day -- it's important to get on the Metro to get to one place that you want to go to quickly.

I will repeat myself again, I think when the new station is built, and it probably will be built, I think it's going to arouse some resentment that the thousands of people who will use it coming through the city were never asked their opinions about whether they wanted the station or not.

**Response:** WMATA and the City of Alexandria provided outreach beyond the Potomac Yard neighborhood, which is documented in Chapter 4 of the Draft EIS.

Section 3.2.3.2 of the Draft EIS discusses impacts to Metrorail operations as a result of the Potomac Yard Metrorail Station. Adding a Potomac Yard Metrorail Station would result in approximately one additional minute in run time between National Airport and Braddock Road Metrorail stations. In the off-peak, one additional train in service is required to accommodate the increased cycle time needed on the Yellow Line from Huntington to Fort Totten. These impacts will result in minimal changes for existing Metrorail riders. (1-5-18, 1)

## 6 PUBLIC HEARING RESPONSE ANALYSIS

### 6.1 Public Hearing Feedback Form

Public hearing attendees had the opportunity to fill out a comment card evaluating the effectiveness of the hearing. In total, 39 comment cards were submitted (see **Figure 6-1** for the feedback form). Not everyone who filled out the form completed every question. **Tables 6-1, 6-2, 6-3, 6-4, 6-5, and 6-6** list the results.

**Figure 6-1: Potomac Yard Metrorail Station Feedback Form**



## Draft Environmental Impact Statement and Plans for the Proposed Potomac Yard Metrorail Station Feedback Form

Thank you for attending today's public hearing. Please take a few minutes to tell us a little about you and your experience and provide us with any additional feedback you have on the draft environmental impact statement and plans for the proposed Potomac Yard Metrorail Station.

Please provide us feedback about your experience today.					
How well did today's public hearing work for you?					
	Excellent	Very Well	Good	Fair	Poor
Location	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Time of Day	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Useful information presented	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How satisfied are you with your opportunity to provide feedback today?					
Extremely Satisfied	Satisfied	Unsatisfied	Very Unsatisfied		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Just a few questions about you. This information is for reporting purposes only.					
Do you consider yourself to be Hispanic/Latino?					
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Prefer not to answer			
Which one of the following best describes your race?					
<input type="checkbox"/> American Indian/Alaska Native	<input type="checkbox"/> Asian/Pacific Islander				
<input type="checkbox"/> Black/African American	<input type="checkbox"/> White/Caucasian				
<input type="checkbox"/> Other	<input type="checkbox"/> Prefer not to answer				
What is your annual household income?					
<input type="checkbox"/> Less than \$30,000	<input type="checkbox"/> \$30,000 or greater	<input type="checkbox"/> Prefer not to answer			
Do you have anything you wanted to add to the conversation that you were not able to share? Please let us know anything else you have to share here:					
OPTIONAL: Include contact information below if you would like it to be submitted with your written comments above.					
Name:	Mailing address:		Email address:		

Thank you for attending today's public hearing. All information gathered tonight will be considered by the WMATA Board of Directors when amending the mass transit plan to include Potomac Yards Metrorail station.

**Table 6-1: WMATA Public Hearing Feedback Form - Location**

How well did today's public hearing work for you, in terms of Location?	Number
Excellent	23
Very Well	8
Good	4
Fair	2
Poor	-
<b>Total</b>	<b>37</b>

**Table 6-2: WMATA Public Hearing Feedback Form - Time of Day**

How well did today's public hearing work for you, in terms of Time of Day?	Number
Excellent	20
Very Well	11
Good	5
Fair	1
Poor	-
<b>Total</b>	<b>37</b>

**Table 6-3: WMATA Public Hearing Feedback Form - Useful Information**

How well did today's public hearing work for you, in terms of Useful Information Presented?	Number
Excellent	17
Very Well	13
Good	4
Fair	-
Poor	-
<b>Total</b>	<b>34</b>

**Table 6-4: WMATA Public Hearing Feedback Form - Overall Satisfaction**

How satisfied are you with your opportunity to provide feedback today?	Number
Extremely Satisfied	21
Satisfied	16
Unsatisfied	-
Very Unsatisfied	-
<b>Total</b>	<b>37</b>

**Table 6-5: WMATA Public Hearing Feedback Form - Race**

Race	Number
Caucasian	26
Black/African American	4
Asian/Pacific Islander	3
Prefer not to answer	3
Hispanic	1
American Indian/Alaska Native	1
Other	1
<b>Total</b>	<b>39</b>

**Table 6-6: WMATA Public Hearing Feedback Form - Income**

Income	Number
Less than \$30,000	1
\$30,000 or greater	33
Prefer not to answer	3
<b>Total</b>	<b>37</b>

## 6.2 Summary of Commenters by Location and Type

During the public comment period from April 3, 2015 through May 18, 2015 public agencies, community organizations, businesses, and the general public submitted comments regarding the Potomac Yard Metrorail Station. A total of 132 individual commenters provided comments through public hearing testimony, feedback card, email, or a combination thereof. The 132 individual commenters and 159 comments are presented by jurisdiction in **Table 6-7**. **Table 6-8** summarizes commenters by organization – individual, federal, state or local agency, non-profit or business.

**Table 6-7 Individual Commenters by Address**

Jurisdiction	Number of Commenters	Number of Comments
City of Alexandria	75	99
Arlington County	6	7
Fairfax County	1	1
Culpepper County	1	1
Washington, D.C.	1	1
Other (GA)	1	1
Unspecified	47	49
<b>Total</b>	<b>132</b>	<b>159</b>

**Table 6-8 Commenters by Organization**

Organization	Number of Comments
Individual	159
State Government	2
Non-profit / Community Organization	2
Local Government	6
Federal Government	2
Business	12
<b>Total</b>	<b>183</b>

### 6.3 Feedback Pertaining to the Public Hearing

A total of four comments were submitted to public record pertaining to the public hearing itself. These comments are listed below:

**(Comment 97):** As an environmental professional I think that Mr. Ashe could have done a better job of making the materials more interesting in his presentation.

**(Comment 108):** [Hearing time] started early!

**(Comment 117):** The review process has been thorough and well-balanced. My compliments.

**(Comment 118):** I think the City has an obligation to completely address the questions and concerns raised by citizens here tonight. I expect them to do so and not just hold a hearing that can then be ignored.

### 6.4 Analysis of Comments Received

A comparative analysis of the comments received by location and race/ethnicity of commenter and comment method is provided to show the results of the public outreach effort.

#### 6.4.1 Demographic Analysis of Commenters

**Table 6-9** lists the number of self-identified City of Alexandria residents who commented during the public comment period compared to the total City population.

**Table 6-9: Percentage of City of Alexandria Residents Commenting**

Number of Commenters	75
City of Alexandria Population (2014)	150,575
<b>Percentage of City of Alexandria Population Commenting</b>	<b>0.05%</b>

Source: U.S. Census QuickFacts Data, 2015.

**Table 6-10** provides a comparative analysis of those who identified themselves as a member of a racial or ethnic minority through the feedback form at the public hearing to the minority populations found in Potomac Yard Analysis Area (as defined in the Draft EIS) and the City of Alexandria. About a quarter of the respondents who completed the public hearing feedback forms identified themselves as minority, while the Potomac Yard Analysis Area and City of Alexandria have minority populations of approximately 45 percent.

**Table 6-10: Comparison of Minority Population at Public Hearing to Project Area Demographics**

Minority Group	Public Hearing Feedback Form		Potomac Yard Analysis Area <sup>1</sup>		City of Alexandria <sup>1</sup>	
	# of Commenters	% of Total	# of Residents	% of Total	# of Residents	% of Total
Hispanic White	1	2.6%	889	8.3%	10,308	7.4%
Black or African American	4	10.3%	2,017	18.8%	30,491	21.8%
Asian/Pacific Islander or Native Hawaiian	3	7.7%	491	4.6%	8,573	6.1%
American Indian/ Alaska Native	1	2.6%	43	0.4%	589	0.4%
Some Other Race	1	2.6%	898	8.4%	9,902	7.1%
Two or More Races	NA	-	398	3.7%	5,225	3.7%
<b>Minority Total</b>	<b>9</b>	<b>25.8%</b>	<b>4,736</b>	<b>44.3%</b>	<b>65,088</b>	<b>46.5%</b>

1. Source: U.S. Census Bureau, 2010 Decennial Census, Summary File 1, as cited in Draft EIS, Section 3.7, Environmental Justice.

NA = Response option not available on comment form.

#### 6.4.2 Outreach Effectiveness Analysis of Comments

As part of the public outreach effort for the public hearing, an email distribution list was created. The distribution list included individuals, federal agencies, state agencies, local/regional agencies, non-profit/community organizations, and businesses who all expressed interest in being included on the project distribution email list. The email distribution list provided the most direct way to contact individuals and organizations interested in the project.

**Table 6-11** provides a comparison of the number of email addresses of individuals (unaffiliated with an organization) or types of organizations on the distribution list compared to the number of comments received by each group.

**Table 6-11: Comparison of Email Distribution to Number of Comments**

Individual / Organization	Number on Project Email Distribution List	Number of Comments by Individuals and Organizations on Distribution List	% Providing Comments
Individual (unaffiliated with organization)	401	159	39.7%
State Government	10	2	20.0%
Non-profit / Community Organization	16	2	12.5%
Local/Regional Government	27	6	22.2%
Federal Government	20	2	10.0%
Business	6	12	200.0%
<b>Total</b>	<b>480</b>	<b>183</b>	<b>38.1%</b>

**Table 6-12** provides the percentage of email submissions received out of the number of individuals and organizations on the email distribution list. Submissions of comments via email provided about an 18 percent return rate compared to the email distribution list.

**Table 6-12: Percentage of Distribution List Providing Comments**

Number of Submitted Comments by Email	84
Number of Email Addresses on Project Distribution List	480
<b>Percentage of Email Submissions to Email Distribution</b>	<b>17.5%</b>

**Table 6-13** provides a comparative analysis of the number of submissions by type (method of submittal) to the total number of submissions. Email submissions represented almost half of all submissions, followed by submissions via WMATA comment forms at the public hearing, and oral testimony at the public hearing.

**Table 6-13: Comment Submission Type Comparison**

Submission Type	Number of Submissions by Type	% of Total Submissions
Email	84	45.9%
WMATA Comment Form	40	21.9%
WMATA Public Hearing Testimony	24	13.1%
Alexandria Public Hearing Testimony	20	10.9%
Alexandria Comment Form	11	6.0%
City of Alexandria Correspondence	4	2.2%
<b>Total</b>	<b>183</b>	<b>100%</b>

## 7 OTHER INFORMATION FOR THE PUBLIC RECORD

### 7.1 Comments Received after the Public Comment Period

Several comments were received after the close of the public comment period on May 18, 2015. Comments received after the close of the public comment period are not addressed in this report; however, responses will be provided in the forthcoming Public Hearing Staff Report Supplement.

Comments were received from the following groups and individuals after the May 18, 2015 closing date:

- Walter C. Clarke, City of Alexandria Chamber of Commerce (two separate submissions were received during the comment period)
- Kathryn Papp (one separate submission was received during the comment period)
- Gavin Lutz
- Troy Creasy, CSX
- Kurt Flynn

These comments are provided in **Appendix I**.

### 7.2 City of Alexandria's Selection of a Preferred Alternative

As described in **Section 4.3**, the Alexandria City Council voted unanimously to endorse the construction of a new Potomac Yard Metrorail Station and selected Build Alternative B as the Preferred Alternative at a special meeting on May 20, 2015. The identification of a preferred alternative now permits the development of the Final EIS. This preferred alternative will be evaluated and compared to the No Build Alternative in the Final EIS. Consistent with the City of Alexandria, FTA will identify its NEPA preferred alternative in the Final EIS. After the public review period of the Final EIS, FTA will issue its Record of Decision (ROD), which will state FTA's decision and present its basis for the decision regarding the NEPA preferred alternative.

Build Alternative B was recommended unanimously by the City's Board of Architectural Review, Environmental Policy Commission, Beautification Commission, Park and Recreation Commission, Planning Commission, Potomac Yard Metrorail Implementation Work Group (PYMIG), and Transportation Commission. City of Alexandria Board and Commission recommendations are provided in **Appendix H**. Build Alternative B was also recommended in an April 24, 2015 City Staff Report. The City's recommendations incorporated public feedback received from hundreds of residents and businesses through the WMATA public hearing and City's outreach and meetings described in **Section 4.0**.

## 8 STAFF RECOMMENDATION

After reviewing the written and oral testimony, WMATA staff recommends the continued refinement of Build Alternative B as the Preferred Alternative for the Final EIS. By selecting Build Alternative B as the Preferred Alternative, Build Alternative A, B-CSX Design Option, and Build Alternative D will not be assessed in the Final EIS. The No Build Alternative will be compared to Build Alternative B in the Final EIS. The 2016 Opening Year conditions analyzed for the Draft EIS will be reassessed at a new date to account for the updated Opening Year based on the current project schedule.

The Final EIS will address relevant comments and questions that were received during the public comment review period. The project team will continue to work with agencies and stakeholders that may be impacted by the Preferred Alternative. Agency consultation will include completion of the Section 106 consultation process. The results of additional agency consultation will be incorporated into the Final EIS.

The City of Alexandria and the National Park Service will continue to develop mitigation measures for project impacts which will be described in the Record of Decision. This process will include the development of a Section 106 Memorandum of Agreement for impacts (adverse effects) to historic properties, including the George Washington Memorial Parkway, a historic site listed in the National Register of Historic Places. The WMATA Board of Directors will need to approve the final recommendations and mitigation measures identified in the Final EIS.

## APPENDICES

- A. Notice of Public Hearing and List of Recipients
- B. Materials Available to Public at Hearing
- C. Open House Display Boards
- D. Public Hearing Staff Presentation
- E. Transcript of Proceedings
- F. All Comments Submitted for Public Record (without annotations)
- G. Reference Materials
- H. City of Alexandria Boards and Commission Submissions
- I. Comments Received after the Public Comment Period
- J. Other Agency Letters