APPENDIX E

Transcript of Proceedings

Docket R15-01: Draft Environmental Impact Statement and Plans for the Proposed Potomac Yard Metrorail Station – April 30, 2015

WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY

PUBLIC HEARING NO. 604

DOCKET R15-01: DRAFT ENVIRONMENTAL IMPACT STATEMENT AND PLANS FOR THE PROPOSED POTOMAC YARD METRORAIL STATION,

ALEXANDRIA, VIRGINIA

Held at:

Cora Kelly Recreation Center

25 West Reed Street

Alexandria, Virginia

Thursday, April 30, 2015

7:00 p.m.

Reported by: Gervel A. Watts, CERT

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1 A P P E A R A N C E S

2 WMATA'S PANEL:

3 William D. Euille, City of Alexandria Mayor

4 Jim Ashe, Manager, WMATA Environmental Planning and Compliance

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1 C O N T E N T S

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WMATA PANEL:

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Introduction, Mayor Bill Euille

4

Presentation, Jim Ashe

5

6 PUBLIC COMMENTERS:

7 Jack Summe

8 Bryan Jungwirth, Virginia Railway Express (VRE)

9 Dino Drudi

10 Aimee Custis, Coalition for Smarter Growth

11 Mark Goode

12 Paul Hertel

13 Robert Whitfield, Fairfax Taxpayers Alliance

14 Mark Anderson

15 Katy Cannady

16 David Fromm

17 Steven Teslik

18 Jerry Foley

19 Dave Cavanaugh

20 Philip Hocker

21 David Dunn

22 Ariana Sekulow

1 Walter Clark, Alexander Chamber of Commerce
2 John Schader
3 Susan Coad
4 Scott Eisele
5 James Melton
6 Betty King
7 Andrea Fitch
8 Tim Roseboom, Department of Rail and Public
9 Transportation (DRPT)
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1 P R O C E E D I N G S

2 INTRODUCTION

3 MAYOR EUILLE: Hello. We're getting

4 ready to start the public meeting. Just to make

5 it official for the recording, (bangs gavel), good

6 evening, ladies and gentlemen. I call this meeting

7 to order.

8 I'm Bill Euille, Mayor of Alexandria and

9 a member of the Board of Directors for WMATA or

10 Metro. With me tonight is Jim Ashe, to my left,

11 Metro's Manager of Environmental Planning and

12 Compliance. Also in the audience are Elizabeth

13 Patel of the Federal Transit Administration.

14 Elizabeth stand and or wave your hand. She's in

15 the back and then John Thomas, Director of Major

16 Capital Projects. John. Okay.

17 I'd also like to recognize the following

18 elected officials in attendance this evening. We

19 have from the City Council, Councilwoman Dell

20 Pepper and Councilman Tim Lovain. Also present

21 with us, representing Congressman Don Beyer's

22 Office is Mike Lucier. Mike.

1 MR. LUCIER: Yes.
2 MAYOR EUILLE: All right. Welcome.
3 There are other events going on tonight, so I'm
4 sure folks will come in later.
5 This hearing is convened by the Federal
6 Transit Administration and Metro Board of
7 Directors to gather comments on the proposed
8 Metrorail Station at Potomac Yard in the City of
9 Alexandria, Virginia. Notice of this hearing was
10 made by publication in the Washington Post and El
11 Tiempo Latino. The Draft Environmental Impact
12 Statement document was placed at local libraries,
13 Alexandria City Hall, Cora Kelly Recreation
14 Center, and WMATA Headquarters for viewing by the
15 public. The document was also posted at the
16 project website, Metro's website, and the city's
17 website.
18 Please note that the City of Alexandria
19 will be hosting a public hearing on May 16th as
20 part of its separate legislative process for the
21 project. The Alexandria City Council will hold a
22 Special Meeting on May 20th to consider selection

1 of a preferred alternative.
2 I will cover the procedures that we will
3 follow during the hearing.
4 First, we will hear a staff presentation
5 on the proposal. Second, we will hear from those
6 persons who registered in advance to speak at this
7 public hearing. Elected officials will be heard
8 first and will be allowed five minutes, then those
9 who registered in advance will be heard in the
10 order of registration and allowed three minutes
11 each. Third, we will hear from anyone present who
12 indicates a desire to be heard and will be allowed
13 three minutes each. Please see Ms. Pena, whose
14 hand is raised, if you wish to speak tonight.
15 Please note that all statements,
16 including any personal information such as name,
17 e-mail address, address, or telephone number you
18 provide in the statement, are releasable to the
19 public upon request, and may be posted on WMATA's
20 website, without change, including any personal
21 information provided. Also, note that the City of
22 Alexandria is videotaping these proceedings, and

1 will post the video on their website. If you wish
2 to provide testimony for the public record but do
3 not wish to be a part of the recorded proceedings,
4 please see Ms. Pena, who can explain the different
5 options available to you to provide comment.
6 If you have copies of your testimony to
7 distribute, please provide them to Ms. Pena as
8 well. If you would like to speak this evening but
9 need to leave before your name is called, you may
10 leave your comments on a digital recording device.
11 Again, please see Ms. Pena.
12 Further testimony may be submitted and
13 must be received by 5:00 p.m. on Monday, May 18,
14 2015 by e-mail to:
15 writtentestimony@wmata.com or
16 comments@potomacyardmetro.com. Alternatively,
17 statements may be faxed to 202-962-1133. Again,
18 that's 202-962-1133 or mailed to Office of the
19 Secretary, WMATA, 600 Fifth Street Northwest,
20 Washington, D.C. 20001 or to Potomac Yard
21 Metrorail Station EIS, PO Box 16531, Alexandria,
22 VA 22302.

1 If you have any questions about the
2 different ways to provide testimony, please see
3 Ms. Pe Your comments will become part of the
4 public record that will be examined by the Metro
5 Board of Directors for its approval. Following a
6 review of all testimony received for the public
7 hearing record, Metro staff will prepare a staff
8 report, which will be available for public comment
9 before it's presented to the Metro Board of
10 Directors. Changes to the options presented here
11 tonight may be proposed in response to testimony
12 received and subsequent staff analysis.
13 Please note that the use of profanity,
14 which I doubt any of us will be using, will not be
15 tolerated during this public meeting. If you have
16 not already done so, please silence all mobile
17 devices, and I now call on Jim Ashe for the staff
18 presentation.
19 STAFF PRESENTATION
20 MR. ASHE: Good evening. I'm Jim Ashe.
21 I will provide a brief presentation that describes
22 the project, the alternatives considered, and the

1 major potential impacts.
2 The Federal Transit Administration and
3 the City of Alexandria, in cooperation with WMATA,
4 are proposing the construction of a new Metrorail
5 station at Potomac Yard along the Metrorail Blue
6 and Yellow Lines. The National Park Service or
7 "NPS" is a cooperating agency because of the
8 potential to impact the George Washington Memorial
9 Parkway.
10 The project includes the construction of
11 a station, associated track improvements, and
12 pedestrian bridges to provide access to the
13 station. As required by the National
14 Environmental Policy Act or NEPA the DEIS was
15 prepared by the FTA and the City in cooperation
16 with WMATA and NPS. The DEIS was developed to
17 assist decision-makers to consider the potential
18 environmental effects of the proposed project.
19 The purpose of the project is to improve
20 local and regional transit accessibility to and
21 from the Potomac Yard area located adjacent to the
22 Route 1 Corridor for current and future residents,

1 employees, and businesses.
2 A new station at Potomac Yard is needed
3 since the project area is not directly served by
4 regional transit services. The proposed station
5 would provide direct access to the Metrorail
6 system and facilitate regional transit trips. The
7 new station is also needed for additional
8 transportation access and capacity to support the
9 City's redevelopment plans for Potomac Yard and to
10 provide a transportation alternative to the
11 constrained roadway network in the area.
12 The DEIS identified potential effects to
13 the built and natural environment from the No
14 Build and Build Alternatives. The environmental
15 considerations addressed in the DEIS were
16 identified during project scoping and presented
17 for public review and comment at the public and
18 agency scoping meetings held on February 10, 2011.
19 The resources reviewed in the DEIS are listed on
20 this slide.
21 More than 35 alternatives were
22 identified during project scoping. After initial

1 review and screening, the DEIS evaluated a No-
2 Build Alternative and four Build Alternatives,
3 identified as A, B, B-CSX Design Option, and D.
4 The first of these, the No-Build
5 Alternative includes all the planned
6 transportation projects expected to be complete by
7 2040, with the exception of the Metrorail station
8 at Potomac Yard. These include the full Potomac
9 Yard street network, local bus service expansions,
10 and a pedestrian and bicycle bridge over the CSX
11 and Metrorail lines connecting the Potomac Greens
12 neighborhood to Potomac Yard.
13 The No-Build Alternative does not
14 improve the regional transit accessibility and is
15 not consistent with the city and regional plans,
16 which call for a new Metrorail station in this
17 area. The No-Build Alternative would also not
18 address noise impacts from the existing rail
19 corridor. The No-Build Alternative would not
20 address the effects of proposed Potomac Yard
21 redevelopment on traffic in the Route 1 corridor
22 or visual effects of the redevelopment on the

1 George Washington Memorial Parkway.
2 The new Metrorail station for
3 Alternative A would be located along the existing
4 Metrorail tracks between the CSX railroad tracks
5 and the north end of the Potomac Greens
6 neighborhood.
7 Two options for construction access are
8 considered in the DEIS. Option 1 includes
9 construction access from Potomac Greens Drive,
10 Potomac Avenue, and the George Washington Memorial
11 Parkway. These routes are shown as the dark
12 orange and crosshatched orange lines on the map.
13 Option 2 would include construction access from
14 Potomac Greens Drive and Potomac Avenue only, with
15 no access from the Parkway.
16 Although both construction access
17 options were studied in the DEIS, the National
18 Park Service has indicated that commercial
19 vehicles are prohibited from the George Washington
20 Memorial Parkway under NPS management policies and
21 Federal regulations. The park superintendent has
22 the discretion to issue permits for commercial

1 vehicles using the parkway if access to private
2 lands is otherwise not available. The proposed
3 construction areas for Alternative A are
4 accessible from routes other than the George
5 Washington Parkway; however, since potential
6 impacts would occur to residential communities
7 along these other routes, construction access from
8 the parkway was studied as an option in the
9 DEIS.
10 The new Metrorail station for
11 Alternative B would be located between the George
12 Washington Memorial Parkway and the CSX railroad
13 tracks, north of the Potomac Greens neighborhood,
14 and east of the existing Potomac Yard Shopping
15 Center. Alternative B would require permanent use
16 of George Washington Memorial Parkway land.
17 Two options for construction access are
18 considered in the DEIS. Option 1 includes
19 construction access from Potomac Greens Drive,
20 Potomac Avenue, and the George Washington Memorial
21 Parkway. These routes are shown as the dark
22 orange and crosshatched orange lines on the map.

1 Option 2 includes construction access from Potomac
2 Greens Drive and Potomac Avenue only, with no
3 access from the parkway.
4 As with Build Alternative A, the
5 National Park Service has indicated that
6 commercial vehicles are prohibited from the George
7 Washington Memorial Parkway under NPS management
8 policies and Federal regulations. The park
9 superintendent has the discretion to issue permits
10 for commercial vehicles using the parkway if
11 access to private lands is otherwise not
12 available.
13 The proposed construction areas for
14 Build Alternative B are accessible from routes
15 other than the George Washington Parkway; however,
16 since potential impacts would occur to residential
17 communities along these other routes, construction
18 access from the parkway was also studied as an
19 option in the DEIS.
20 B-CSX Design Option is a variation of
21 Alternative B that would be located east of the
22 existing Potomac Yard Movie Theater, on land

1 currently occupied by the CSX railroad tracks.
2 This option requires that the CSX tracks be
3 relocated to the west to accommodate the new
4 Metrorail station. This Design Option was
5 developed in an effort to avoid use of the George
6 Washington Memorial Parkway property and the
7 Greens Scenic Area Easement.
8 Construction staging areas for B-CSX
9 Design Option are shown in the light orange shaded
10 areas on the slide. These include portions of
11 Potomac Yard Park, Rail Park, and the existing
12 parking lot near the movie theater. Construction
13 access would be provided via Potomac Avenue and
14 Potomac Greens Drive.
15 Alternative D would be located west of
16 the CSX railroad tracks near the existing Potomac
17 Yard Shopping Center. The alternative includes an
18 elevated station and tracks starting north of Four
19 Mile Run, a new bridge over Four Mile Run,
20 crossing over the CSXT tracks into Potomac Yard,
21 and then re-crossing the CSXT tracks to reconnect
22 with the existing Metrorail line.

1 The construction staging areas for Build
2 Alternative D are shown in the light orange shaded
3 areas on the slide. These include portions of
4 George Washington Memorial Parkway land, Potomac
5 Greens Park, Rail Park, and Potomac Yard Park.
6 Construction access would be provided from Potomac
7 Greens Drive, Potomac Avenue, and the George
8 Washington Memorial Parkway.
9 The National Park Service has indicated
10 that commercial vehicles are prohibited from the
11 George Washington Memorial Parkway under National
12 Park Service management policies and Federal
13 regulations. The park superintendent has the
14 discretion to issue permits for commercial
15 vehicles using the parkway if access to private
16 lands is otherwise not available.
17 The proposed construction areas for
18 Build Alternative D in the area near Four Mile Run
19 are not accessible from routes other than the
20 George Washington Parkway.
21 I hereby enter the property acquisition
22 listing into the hearing record. A copy is

1 available with Ms. Pena. The general plans from
2 the DEIW are available for inspection on the table
3 to your left.
4 Potential impacts are documented in the
5 DEIS. Key resources impacted include local plans
6 and zoning, parklands, visual resources, cultural
7 resources, including the George Washington
8 Memorial Parkway, noise and vibration, wetlands
9 and waterways, and floodplains.
10 This project could result in adverse
11 effects to view sheds from Potomac Greens, Potomac
12 Yard, and the George Washington Memorial Parkway
13 and the Mount Vernon Memorial Highway, which are
14 listed on the National Register of Historic
15 Places.
16 Noise and vibration impacts to the
17 surrounding community are predicted under the
18 alternatives. Metrorail door chimes, train
19 announcements, station announcements, and brake
20 noise are not expected to exceed FTA or WMATA
21 criteria; however, these sources will be evaluated
22 more closely during final design when the station

1 features are finalized.
2 The project could impact the Greens
3 Scenic Area Easement, the scenic easement
4 administered by the National Park Service on city-
5 owned land. Some secondary and cumulative impacts
6 are projected.
7 Temporary Construction impacts are
8 detailed in the DEIS also. Temporary construction
9 impacts include removal of trees and vegetation
10 within construction staging and access areas and
11 filled or leveled ground. Construction Access
12 would result in temporary impacts to local parks,
13 wetland areas, floodplains, and a city- designated
14 resource protection area. Construction could
15 impact the Greens Scenic Area Easement.
16 Construction will create temporary
17 impacts to the Potomac Greens community, and the
18 Potomac Yard area, and could cause temporary
19 impacts to the George Washington Memorial Parkway
20 land, specifically the parkway's southbound
21 roadway. Potential impacts include traffic, noise
22 and vibration, and dust associated with

1 construction activities.
2 The City of Alexandria will manage the
3 capital-funding plan. The City of Alexandria will
4 fund the station using revenue generated by new
5 development in Potomac Yard. The station fund
6 collects revenue from new tax revenues generated
7 by Potomac Yard development, two special tax
8 districts, and developer contributions.
9 The project has been approved for a $50
10 million loan through the Virginia Transportation
11 Infrastructure Bank. The City will continue to
12 pursue other regional, state, and federal sources.
13 In additional to seeking comments about
14 the DEIS, the project invites comments on the
15 Section 106 process. The project team has
16 identified the Area of Potential Effects and the
17 consulting parties, and developed a preliminary
18 assessment of effects. FTA anticipates sending a
19 formal determination of effects to the State
20 Historic Preservation Office in the near future. A
21 Memorandum of Agreement to minimize and mitigate
22 adverse effects would likely follow.

1 The comment period on the DEIS will
2 remain open until 5:00 p.m. on May 18, 2015. A
3 Public Hearing Staff Report will then be prepared
4 that includes all of the comments submitted during
5 the comment period and responses to those
6 comments.
7 The Public Hearing Staff Report will be
8 available for public review and comment for a 10-
9 day period before it is presented to the WMATA
10 Board. A Public Hearing Staff Report Supplement
11 will then be prepared, including comments received
12 on the Draft Public Hearing Staff Report, and also
13 the WMATA staff recommendation regarding the
14 project. This recommendation will be made after
15 the City's action.
16 Following tonight's public hearing, the
17 City of Alexandria will choose a preferred
18 alternative as part of its separate legislative
19 process. The City Council will host its own
20 public hearing on May 16th and will hold a Special
21 Meeting on May 20th to consider selection of a
22 preferred alternative.

1 A Final EIS will then be prepared that
2 documents the preferred alternative, any
3 refinements and mitigation measures to minimize
4 adverse impacts, comments received on the DEIS,
5 and responses to those comments.
6 This concludes the staff presentation.
7 MAYOR EUILLE: Well, thank you very
8 much. We're now ready to move the public comment
9 portion of this hearing. And again, I would like
10 to remind everyone of the rules. We will hear
11 first from those persons who registered in advance
12 to speak at this public hearing. Elected
13 officials will be heard first and will be allowed
14 five minutes to speak, then those who registered
15 in advance will be heard in the order of
16 registration and allowed three minutes each.
17 Third, we will hear from anyone present
18 who indicates a desire to be heard and will be
19 allowed three minutes each. Please see Ms. Pena,
20 whose hand is raised over here to your left, if
21 you wish to speak tonight and have not yet
22 registered.

1 As a reminder, the City of Alexandria is
2 videotaping these proceedings, and will post the
3 video on their website. If you wish to provide
4 testimony for the public record but do not wish to
5 be a part of the recorded proceedings, please see
6 Ms. Pena who can explain the different options
7 available to you to provide comment.
8 If you would prefer to give your verbal
9 comments in private via a digital recording device
10 to be entered into the hearing record, please also
11 see Ms. Pena. If you would like to have a
12 microphone brought to you rather than speak up
13 front, please stand up and/or wave your hand when
14 your name is called, and we'll bring one to you.
15 There is a timer here that will count
16 down how much time you have left to speak. It
17 will give you a warning beep when you have 20
18 seconds left and will beep continuously when your
19 time is up.
20 Before you begin your remarks, I will
21 ask you to state your name and the organization
22 you represent, if any. Please note that all

1 statements, including any personal information
2 such as name, e-mail address, address, or
3 telephone number you provide in the statement, are
4 releasable to the public, upon request, and may be
5 posted on WMATA's website, without change,
6 including any personal information provided.
7 Speakers who need to leave before their
8 turn comes up, may alternatively give their
9 comments via a digital recording device to be
10 entered into the record. Once again, please see
11 Ms. Peif you would like to take advantage of this
12 option. And with that, we will begin the public
13 hearing testimony and the first speaker will be
14 Mr. Jack Summe, to be followed by Bryan Jungwirth.
15 MS. PENA: I just want to make sure the
16 mic is on.
17 MAYOR EUILLE: Okay.
18 PUBLIC COMMENTS
19 MR. SUMME: I'm Jack Summe; I'm speaking
20 on behalf of myself and my family. Good evening.
21 I'm Jack Summe. I live at 1855 Potomac Greens
22 Drive, Alexandria, Virginia. My family and I have

1 lived in this location since April of 2011 and we
2 plan to live there for a long time to come.
3 We purchased our townhouse so that we
4 would be close to my place of employment near the
5 Pentagon, in an area that is quiet, family
6 friendly and safe. I also want to state that I
7 only represent myself and my family in presenting
8 this statement; however, I would like to point out
9 that I live directly across the small residential
10 street in Potomac Greens from the park that would
11 become the Metro station under Alternative A,
12 essentially placing a high traffic metro center in
13 what many would call my front yard. That is why
14 I'm here today.
15 I want to state my enthusiastic support
16 for the building of a Metrorail station in the
17 Potomac Yard area and I stand in strong support
18 for Alternative B of the four proposals. That
19 means I oppose Alternatives A, B-CSX and D of the
20 four proposed locations. To reiterate, I support
21 Alternative B of the four proposals and I stand in
22 opposition to the other three proposals.

1 Hopefully, in line with the reasoning
2 for the construction of a Potomac Yard Metrorail
3 station, my criteria for supporting Alternative B
4 is simply because it provides the greatest and
5 most readily available access to both the
6 commercial and residential areas of Potomac Yard
7 and Potomac Greens.
8 Alternative A, on the other hand, has
9 several detractors. Because of its more southern
10 location, it provides less readily available
11 access to the commercial areas in Potomac Yard. In
12 my view, it would also have a significant negative
13 impact on the members of community, Potomac
14 Greens. It would take away a quaint and lovely
15 park that is used continuously by family and
16 others for an open green space for children and
17 pets to play. Further, it would bring the
18 potential of dumping a large, non-resident
19 population directly into an otherwise quiet,
20 peaceful, and safe community.
21 Finally, a modern, efficient Metrorail
22 station in that close proximity to more

1 traditional townhome community would seem out of
2 place and contrary to the aesthetics of the
3 Potomac Greens neighborhood. Conversely,
4 Alternative B represents the best of both worlds
5 in that it dislocates the station farther north
6 along the Metrorail, away from the very close
7 proximity to Potomac Greens. It provides,
8 essentially, direct access to the commercial areas
9 of Potomac Yard and allows a residential
10 pedestrian access from Potomac Greens without
11 directly intruding upon a quiet and peaceful
12 neighborhood.
13 From my perspective, Alternative B
14 clearly meets the intent of a Metrorail station in
15 Potomac Yard by providing direct access to all
16 adjacent commercial and residential areas while
17 moving the bustle and activity of a Metrorail
18 station north and away from the effected
19 residential areas.
20 I also understand that Alternative B is
21 one of the least expensive of the alternatives and
22 would be less problematic to build. I understand

1 that Alternatives B-CSX and D both represent more
2 costly and time-consuming alternatives that should
3 be rejected.
4 I want to thank the Panel for this
5 opportunity to allow me to speak, and I ask for
6 your support for Alternative B. Thank you.
7 MAYOR EUILLE: Thank you. Bryan
8 Jungwirth, to be followed by Dino Drudi.
9 MR. JUNGWIRTH: Good evening. My name
10 is Bryan Jungwirth, I'm the Government Relations
11 and Public Affairs Director for the Virginia
12 Railway Express and I'm speaking tonight to share
13 the areas of concerns regarding the Potomac Yard
14 Metrorail station alternatives considered in the
15 Draft EIS, especially the Build Alternative B-CSX
16 design option.
17 As you may know, VRE is a commuter rail
18 provider; we operate 30 trains a day within the
19 CSX right-of-way, between Alexandria and
20 Washington, D.C., and we carry about 19,000 riders
21 each weekday. It's a safe, reliable, and
22 efficient alternative to driving for long distance

1 commuters.
2 Currently, VRE service removes the
3 equivalent of a lane of traffic on both I-95 and
4 I66 travel corridors in the morning and evening
5 rush hours. On-time performance is at near record
6 highs with approximately 95 percent of the trains
7 arriving at their final destination within five
8 minutes of their scheduled arrival time. This is
9 very important to VRE riders as a top influencing
10 factor in their decision to ride on VRE. Any
11 actions that have the potential to degrade VRE
12 operations are of great concern.
13 We believe the CSX design option will
14 have a negative effect on VRE commuter rail
15 operations due to the impact of construction
16 activities within and adjacent to the CSX right-
17 of-way, combined with similar negative impacts to
18 Amtrak city trains, which also use the CSX right-
19 of-way, freight traffic and we believe the
20 railroad operations will therefore, be
21 significantly affected.
22 The Draft EIS indicates the realigned

1 CSX tracks would be constructed first and railroad
2 traffic shifted to the new alternative or into the
3 new alignment. Once the CSX tracks are complete,
4 construction of the Metrorail station would begin.
5 Primary access to the construction area is from
6 the western side of the CSX right- of-way, across
7 the active CSX track. While the DEIS does not
8 indicate the length of the construction period for
9 realigning the CSX track versus the Metrorail
10 construction, the total construction period is
11 estimated at two years.
12 Although the DEIS indicates the CSX
13 design option will require extensive preplanned
14 outages on the CSX track, it fails to evaluate the
15 outages on railroad operations and the effects of
16 daily unplanned stoppages of train traffic to
17 allow construction workers, vehicles and equipment
18 to cross the CSX right-of-way to access the
19 Metrorail station construction site or the
20 potential for the imposition of slow orders for
21 trains operating within the CSX right-of-way for
22 the duration of the construction period.

1 The uncertainty of the types and levels
2 of potential construction impacts associated with
3 the CSX design option and the lack of detailed
4 evaluation of those impacts on railroad operations
5 are serious concerns for VRE. The segment of
6 track is used by all VRE trains and any activities
7 that effect travel on the rail corridor can have a
8 devastating effect on our operations.
9 Queueing of the trains through the
10 construction site will become commonplace during
11 the duration of the construction, due to the slow
12 orders and so forth.
13 MAYOR EUILLE: Time's up.
14 MR. JUNGWIRTH: Okay. Thanks. I'll
15 provide the rest in a written statement.
16 MAYOR EUILLE: All right. Next, we have
17 Dino Drudi, followed by Aimee Custis.
18 MR. DRUDI: Thank you, Mayor Euille and
19 Mr. Ashe. And thank you, Mr. Ashe, for that very
20 succinct prof the entirety of the project and the
21 EIS.
22 I have been a Metro rider for nearly all

1 of the time that I have lived here. When I was a
2 student at Catholic U and the Brookland Station
3 opened, I rode the Metro the first day and it has
4 been my primary method of getting around since
5 that time.
6 I also spoke against the in-fill station
7 at NoMA, calling it a bad idea whose time has
8 come. That station had a cost estimate -- a cost
9 overrun of something on the order of 30 to 40
10 percent, and there is no reason to believe that
11 whatever alternative they choose, other than the
12 No-Build Alternative, which is the right
13 alternative to choose, will not have a cost
14 overrun of at least that magnitude.
15 The Metro Way bus can function perfectly
16 well to distribute -- to fill the need for mass
17 transit in that locale. From Crystal City to
18 Braddock Road, it can distribute all the people
19 who would use that Metro station throughout the
20 developments to be built. It is far less
21 expensive to enhance slightly the Metro Way Bus
22 Rapid Transit System to perform the function that

1 the proposed Metro station is desired to perform.
2 WMATA has a problem; it is over-
3 allocated. It's trying to do too much with its
4 resources and as a consequence, it can't do things
5 well. Ten or 15 years ago, WMATA walked on water;
6 it was the best public transit system in the
7 country. Hardly anyone would say that now.
8 Distractions like this will take
9 resources and management attention away from
10 fixing the safety problems. The cell reception,
11 which are way late on throughout the system. The
12 SmarTrip card, which is going away because it's
13 not manufactured anymore. Metrorail, five to ten
14 years ago, reached its capacity. It has a plan to
15 add capacity, but that plan is unproved, it's
16 speculative. No new Metro station should be built
17 with Metro at and beyond its design capacity.
18 Thank you.
19 MAYOR EUILLE: Thank you. Aimee Custis,
20 to be followed by Mike Goode. Excuse me, Mark
21 Goode. Sorry.
22 MS. CUSTIS: Good evening, Mayor Euille.

1 Good evening, Metro riders and Alexandria
2 residents. I'm Aimee Custis, the Communications
3 Manager for the Coalition for Smarter Growth. The
4 Coalition for Smarter Growth is the leading
5 organization working locally in the Washington,
6 D.C. metro area, dedicated to making the case for
7 Smart Growth.
8 Our mission is to promote walkable,
9 inclusive, and transit-oriented communities and
10 the land use and transportation policies to make
11 those communities flourish. The Coalition for
12 Smarter Growth has closely tracked the planning
13 process for the Potomac Yard Metro station and
14 reviewed the NEPA documentation. The study has
15 been extensive and rigorously analyzed all
16 available alternatives.
17 The Coalition for Smarter Growth
18 supports Alternative B as the best alternative
19 from a smart growth transportation, economic
20 development, and environmental perspective. We
21 recognize that Alternative B will have an impact
22 on National Park Service land, a related easement,

1 and a limited amount of wetlands; however, we
2 support the mitigation measures being proposed and
3 believe that the mitigation, together with the
4 environmental benefits of Alternative B support
5 the selection of this alternative.
6 Alternative B will located closer to
7 planned mixed-use redevelopment than Alternative A
8 and is less costly and with fewer engineering and
9 third party challenges than the other
10 alternatives. Alternative is critical to
11 supporting over 7 million square feet of planned
12 transit-oriented development at the old Potomac
13 Rail Yard. That will maximize transit, walking
14 and bicycling trips and reduce regional auto
15 trips.
16 This will not only help address regional
17 and Alexandria transportation challenges, but will
18 also help reduce air pollution and greenhouse gas
19 emissions. Climate changes are the greatest
20 environmental, human health, economic and national
21 security challenge over the next decades and we
22 need to do everything we can to reduce emissions,

1 including those from transportation.
2 Alternative B is also critical to
3 supporting economic development in Alexandria and
4 increasing the commercial tax base, reducing
5 pressure on residential property taxes. Studies
6 have shown that compact redevelopment is more
7 efficient, yielding more taxes per unit of
8 development. It also supports market trends.
9 Right now, 84 percent of office development in the
10 pipeline is within one-quarter mile of Metro
11 stations in our region. And so far, in 2015, 92
12 percent of office leases over 20,000 square feet
13 have been within one-half mile of Metro.
14 You may have read recently that the CEO
15 of Marriott announced the company's intention to
16 move its headquarters from a suburban office park
17 in the next five years. They'll be going to a
18 Metro station. This new Metro station is a wise
19 investment. The NoMA in-fill station in D.C.
20 cost just over $103 million in 2004 and
21 has sparked 3.8 million square feet of
22 development, 183 million square feet of retail,

1 and over 3,000 residential units and 622 hotel
2 rooms, collectively valued at $4.7 billion.
3 Alternative B will do the most for
4 Potomac Yard as a walkable transit-oriented hub
5 and will maximize transportation and environmental
6 benefits.
7 MAYOR EUILLE: Thank you.
8 MS. CUSTIS: Thank you.
9 MAYOR EUILLE: Mark Goode, to be
10 followed by Paul Hertel.
11 MR. GOODE: Good evening. My name is
12 Mark Goode, and I live at 1816 Potomac Greens in
13 Alexandria. I'm speaking for myself and my wife.
14 I'd like to confine my remarks this
15 evening to the issue of noise relating to traffic
16 that would travel to and from the proposed site
17 through my neighborhood, Potomac Greens, under
18 Alternative B. To keep my remarks focused on
19 facts, based on the suggestions of city planners
20 who have commented that the traffic and activity
21 of the proposed Potomac Yard site would be
22 equivalent to the existing Braddock Metro rail

1 site, I elected to perform an audio site survey, a
2 practice common to your own engineers, and
3 compared the traffic noise pattern of Braddock
4 station with the current noise levels of the
5 Potomac Greens neighborhood.
6 I documented the instrumentation I used
7 for the audio site survey, the methodology, the
8 interpretation of the assessed results and a 13-
9 page White Paper that I have submitted to the
10 City, and have available tonight for
11 those who might be interested. Here are the key
12 findings: 1) Alternative B proposes building
13 a covered walkway and a drop-off/pickup point at
14 the northern-most end of our currently lightly
15 traveled neighborhood. This drop-off/pickup point
16 would generate significant increased traffic in
17 our neighborhood. How much? Between one and-a-
18 half and eight times the current level of noise.
19 2) The level of noise would adversely impact
20 the quality of life of our neighborhood and
21 potentially impact the value of our homes. 3)
22 I measured noise from traffic, not trains, that

1 exceeded 80 decibels. This presents an immediate
2 health hazard to residents of the neighborhood.
3 Neurologists have studies and documented the
4 impact of noise levels that exceed 80 decibels on
5 humans. It stimulates what is known as an
6 auditory startle reflex, which includes increased
7 heart rate, flow of adrenaline, and tightening of
8 muscles. Repeated exposures to those noise levels
9 produce stress and anxiety and other mental health
10 problems, which our neighborhood does not need.
11 These problems can be remedied with two
12 simple courses of action. First, remove the
13 Potomac Greens drop-off point and covered walkway
14 from the plan. Replace it with a planned
15 pedestrian and bicycle bridge located at the
16 traffic circle that sits on the boundary between
17 Potomac Greens neighborhood and the Old Town
18 Greens neighborhood. This would facilitate
19 pedestrian and bicycle access to the Metrorail
20 station while removing any need for any rail
21 commuter to ever drive through that neighborhood.
22 Second, build a visual and audio berm

1 north of Potomac Greens neighborhood and south of
2 the planned Alternative B site. The neighborhood-
3 acing site would be a gently sloping hill, planted
4 with native shrubbery and topped with a tree line.
5 The station-facing side would be a concrete wall,
6 perpendicular to the ground, which would act as an
7 audio reflector to bounce audio waves generated by
8 the station, away from the neighborhood.
9 This barrier would provide two forms of
10 relief: an effective audio barrier to preserve the
11 current 50 dB audio sound level of the
12 neighborhood and an effective visual barrier so
13 that when residents standing on Potomac Greens
14 look north, they see Virginia hillside and not an
15 alien ship that has landed in a colonial
16 neighborhood. Thank you.
17 MAYOR EUILLE: Thank you. Paul Hertel,
18 to be followed by Robert Whitfield.
19 MR. HERTEL: Mr. Mayor, my name is Paul
20 Hertel. I'm here speaking on my own behalf. Let
21 me start with what some of the deficiencies I
22 think are in the EIS. It does not include the

1 agreement between the City of Alexandria and the
2 Park Services regarding compensation for using
3 scenic easement and federal parkland to build on
4 Option B.
5 The construction of the George
6 Washington Memorial Parkway included easements to
7 obscure the railroad yard to ensure the creation
8 of a beautiful vista as one entered the City of
9 Alexandria. The current arrangement is not
10 included in the EIS, except for a monetary amount
11 devoted to the trail and Dangerfield Island.
12 Fixing up Dangerfield Island is
13 laudable, but it's not part of the purpose of the
14 George Washington Memorial Highway, and in no way
15 compensates for the degradation of the parkway
16 that will transpire.
17 Second, the mitigation needed for
18 cleaning up the wetlands: Potomac Yard was one of
19 the most active railroad yards in the United
20 States, with a significantly polluted soil and the
21 water from the yard runs off into the wetlands.
22 There is no discussion about it or the

1 ramifications in the EIS.
2 Third, the discussion about the current
3 unprojected conditions on the blue line: The
4 current conditions on the blue lines are already
5 deplorable, and there is no discussion on the
6 effects of an additional station.
7 Let me then go onto the meaning of the
8 George Washington Memorial Parkway. It is in no
9 small measure, thanks to George Washington, that
10 one end, and the city the bears his name on the
11 other, and his significance in the American
12 culture that created the need for the George
13 Washington Memorial Parkway. And when it was
14 created, Alexandria lobbied hard to have it run
15 through Alexandria and promised to maintain it in
16 such a condition because Alexandria was in a most
17 dilapidated form. It saved and created Alexandria
18 that we know today.
19 As a matter of fact, the George
20 Washington Memorial Parkway is not a neglected
21 step, but rather the impetus, because the entire
22 historic district was created to protect the

1 George Washington Memorial Parkway. And that was
2 Alexandria's promise because we had become so bad
3 that the Federal Government threatened to move it.
4 It is what puts us on the map.
5 And then let me go to the -- on the
6 analysis portions between Option A and Option B.
7 When you look at it, we're really talking 500
8 feet. In Option B, it not within a quarter-mile
9 radius, not even close. The lending pad is barely
10 within a quarter-mile, but yet the report keeps
11 maintaining falsehood. And not only that, the
12 report does not include the 28 -- the $14 million
13 that will be lost from the revenue that is
14 currently generated from the sales taxes over at
15 the Potomac Yard Shopping Center.
16 MAYOR EUILLE: Thank.
17 MR. HERTEL: So Option B would actually
18 cost $28 million a year to maintain.
19 MAYOR EUILLE: Thank you. Robert
20 Whitfield, Mark Anderson. I want to acknowledge
21 the presence of Councilmember Paul Smedberg, City
22 Manager Mark Jinks, and Transportation Director

1 Yon Lambert. Robert.
2 MR. WHITFIELD: Good evening. I'm
3 Robert Whitfield, with the Fairfax County
4 Taxpayers Alliance. And I've only started to look
5 at the documentation in recent weeks. I would
6 only note that when the Dulles Rail Project was
7 proposed and the environmental impact statements
8 were prepared in 2004, what actually happened was
9 radically different, in terms of the financing
10 structure. And I'm told the EIS doesn't even
11 consider the financial aspects and the economic
12 consequences. And so that's a deficiency of NEPA
13 and I will provide further comments when I have
14 looked at what the city's materials are.
15 I was a former geotech engineer 40 years
16 ago and I am aware, somewhat, of the environmental
17 problems and the potential remediation costs. I
18 will be looking very carefully at what -- who is
19 responsible for those remediation costs and what
20 happens if they end up being more than have been
21 projected. So I would defer further comment until
22 I have read the documents.

1 MAYOR EUILLE: Thank you. Mark
2 Anderson, to be followed by Katy Cannady.
3 MR. ANDERSON: Good evening, Mayor.
4 Good evening, Mr. Ashe. As the process continues
5 toward determining whether or not a new Metro
6 station should be built between Braddock Metro and
7 Ronald Reagan National Airport, I wanted to raise
8 the following questions in the hopes that the
9 answers will be known prior to the final decision
10 being made in this project.
11 The purpose of the National
12 Environmental Policy Act, NEPA, in other words, is
13 to ensure that environmental factors are weighed
14 equally when compared to other factors in the
15 decision-making process undertaken by federal
16 agencies. If this were the case, then why would
17 city staff select Option B, based on the best
18 economic benefit for the City of Alexandria,
19 according to the Staff Report, then it would
20 appear Option B-CSX is the best choice for the
21 environment.
22 Just last week, the Washington Post

1 reported that the Washington area population
2 increase is slowing down, according to census
3 figures. Alexandrian and Arlington have seen more
4 people move out rather than move in. Have the
5 decision-makers taken this into account in their
6 assessment?
7 The Fuels Institute, a non-profit,
8 research-oriented think tank, founded by the
9 National Association of Convenience Stores,
10 dedicated to evaluating the market issues related
11 to consumer vehicles and the fuels that power
12 them, recently released a report indicating that
13 the driving pool is saturated and that
14 transportation demand has stabilized after a
15 century of continuous growth.
16 The Draft EIS seems to indicate that a
17 Metro station will remove cars from the roadways,
18 when, in fact, it would appear that this is
19 already being accomplished naturally. Was this
20 data taken into account when developing the Draft
21 EIS?
22 And finally, the Draft EIS states that,

1 "The project is proposed to improve local and
2 regional transit accessibility to and from the
3 Potomac Yard area." Do we really need more
4 options in addition to the following that already
5 exists?
6 WMATA buses Metro Way, DASH, the Reagan
7 Metro stop, the Braddock Metro stop, Capital
8 Bikeshare, Zip Car, taxi services, Uber, and
9 others, too many to name. How much is enough.
10 Thank you.
11 MAYOR EUILLE: Thank you. Mark
12 Anderson, to be -- excuse me. Katy Cannady, to be
13 followed by David Froman.
14 MS. CANNADY: Can I still talk?
15 MAYOR EUILLE: Yeah.
16 MS. CANNADY: Good. I'm Katy Cannady.
17 I live in the Potomac West Mall Area Plan, which
18 is very near to the Potomac Yard, so I followed
19 this process ever since the railroad pulled out.
20 First, I want to say something about the
21 gentleman who is concerned about losing his
22 neighborhood park. It's a tragedy when we lose

1 parkland. We don't have enough anywhere in the
2 city, but Option B impinges on the parkway. So
3 much so that we will have to add to its cost, the
4 millions of dollars that we will have to pay the
5 Park Service to compensate for the damage we are
6 doing to the George Washington Parkway.
7 Even if you don't care at all about
8 American history, and I do, it's a wonderful
9 drive, the nicest one in the city. Everyone is
10 the city who travels it enjoys it and we should
11 not even consider impinging upon it.
12 For all intents and purposes, the only
13 real options are A, B, and no-build. And we have
14 not discussed, as we should, the wonderful thing
15 that we will have even with no-build and that's
16 the Metro Way. We shouldn't just call it the
17 Metro Way; it is a true bus Rapid Transit. It
18 runs on its own lanes, either on the Yard or on
19 Route 1. It's only in mixed traffic for a very
20 short area near the Braddock Metro. This is a
21 true BRT. They give you all the speed of a Metro
22 because they don't have to compete with other

1 traffic.
2 Now that Arlington has given up on
3 streetcars, they will extend the BRT across their
4 part of the Yard, all the way into Crystal City.
5 This is by far the best solution. It's good
6 transit. It does not affect anybody's parkland
7 and it's just better. But if the city feels it
8 must have a Metro, A costs much less, and it's
9 only, at most, three blocks away from B. And
10 every one of those blocks is going to cost us a
11 few million dollars. Is that really worth it?
12 Overall, it will cost all a great deal
13 because there's more financing. It's just an idea
14 whose time has not come. We need -- Metro was
15 great in its day; I commuted on it for years, but
16 we need new solutions and a true working BRT would
17 serve the Yard, serve the residents nearby and not
18 impinge on anybody's parkland. And to me, that's
19 what matters most.
20 MAYOR EUILLE: David Froman, Steve
21 Teslik.
22 MR. FROMM: Fromm.

1 MAYOR EUILLE: I'm reading what's typed
2 here, Dave. I apologize. It is Fromm; I know you
3 personally.
4 MR. FROMM: My name is David Fromm.
5 Thank you, Mayor Euille.
6 MAYOR EUILLE: We'll correct that for
7 the record.
8 MR. FROMM: I'm representing myself and
9 I live in the Del Ray neighborhood. We've been
10 looking forward to getting a Metro for a long,
11 long time and it's interesting to see it's finally
12 getting near fruition, at least in terms of
13 permissions to build it.
14 In looking at the different plans, in
15 Site A has been in, you know, the Area Plan for
16 forever. And if you didn't know it was coming,
17 you didn't do your due diligence when you bought
18 your property.
19 Site B, though, does work for the
20 economics of the vision for the city. And while I
21 appreciate that it impinges into the parkland, and
22 there are historic reasons not to do that, but I

1 would say that if you build at Site B, then it is
2 incumbent upon you to fully restore the wetlands
3 and the land around it. And that's going to cost
4 money, so plan on it. And what you build there
5 should not look modern, it should be maybe
6 something if you were going down a country road in
7 George Washington's time, this is the kind of
8 building you might see. So that you don't
9 actually perceive that there's a Metro; there's
10 just a building there that is, perhaps, more
11 historically appropriate. It may cost more to
12 build. If it's made out of stone, it would
13 provide that wall that was being requested by the
14 earlier speaker. So I think that if you're going
15 to make a commitment to Option B, Mayor Euille and
16 the City Council, then you also need to really
17 stand up and commit that you're going to spend the
18 money to restore the lands, to build the
19 appropriate historical building effectively so
20 that when it's all done, it looks right.
21 This is very similar to -- I mean, when
22 things are rebuilt in the historic district, we

1 don't require them to be historic through the
2 entire construction process. They have to be
3 historic when it's done. And so I think we should
4 take the same approach with Option B. Thank you.
5 MAYOR EUILLLE: Thank you. Steven
6 Teslik, Jerry Foley.
7 MR. TESLIK: Yes. Steven Teslik, a
8 resident of Potomac Greens. Again, like my
9 friend, Mark, I want to raise the following
10 questions to you, in hopes that the answers will
11 be known prior to the final decision being made on
12 this project.
13 The EIS mentions traffic congestion on
14 Route 1 and that the new Metro station will help
15 pull cars off the road. The question is how can
16 that be the case when the cars on Route 1 are
17 actually going through the area on the way to
18 Washington, D.C., Pentagon and Crystal City.
19 This is my second question. Metro has
20 endorsed the ideas of a new metro station on the
21 system. How does this new asset factor into the
22 long-term maintenance and funding for a station

1 when Metro is faced with over 10,000 in
2 maintenance backlog, the need to enhance an
3 improve safety within the system; the second phase
4 of the silver line Metro extension being 13 months
5 behind schedule, and not expected to begin service
6 until 2020; and Phase 1 of the silver line, now
7 pegged at $2.9 billion and continued replacement
8 of older Metro cars with a new 7000 series?
9 My third question: The EIS made
10 reference to the existing Potomac Yard Shopping
11 Center as consideration for the proposed station.
12 Isn't that Center going to disappear? Isn't the
13 movie theatre going to disappear? If not, when
14 did that change?
15 Also, what is the yearly tax revenue
16 that the city receives from the shopping center
17 and the movie theatre? What will the city do to
18 make up for that lost revenue when the shopping
19 center disappears?
20 Fourth question. The Washington Post
21 reported that the new office building construction
22 has leveled off and the rents have fallen. The

1 National Gateway Building located on Glebe and
2 Route 1 has over 360,000 available square feet for
3 new offices and has had this since the building
4 was first completed some five years ago. What
5 data are you using to prove that the new "City"
6 that would be constructed will actually be
7 occupied?
8 And my final question is continuing to
9 use NEPA as the basis for EIS, Alternative B,
10 chosen by the City of Alexandria staff, would
11 permanently fill in 1.22 acres of wetlands
12 regulated by the Army Corps of Engineers under the
13 Clean Water Act. The B-CSX option would impact
14 this area far less in one-tenth of an acre. Why
15 is B-CSX not the correct location for the new
16 station based on this data point?
17 And on my personal view, it's either
18 than or else, please put the monies into a more
19 efficient bus system that's already available,
20 which if it needed changes with the development of
21 that area, would be much easier to change.
22 MAYOR EUILLE: Thank you. Jerry Foley,

1 David Cavanaugh.
2 MR. JERRY FOLEY: Good evening. I'm
3 Jerry Foley. I reside in Old Town. Well, when I
4 first heard about this plan, I asked will there be
5 restrooms, you know, and I was glad to hear that.
6 You know, at least we're doing something
7 civilized. And I had thought about Plan B, but
8 after I'm hearing other people speak, I'm
9 beginning to ask is this really needed?
10 And the expense that is one thing that
11 has a lot to be concerned with and it seems to be
12 what we're really more concerned about, like
13 people, say, from Potomac Greens wanting to
14 Potomac Yards. So why don't we just go to a much
15 cheaper plan and build an over-the-street walkway
16 for people coming from Potomac Greens into Potomac
17 Yard area?
18 It just would make it easier for a lot
19 of people to walk over these tracks and that would
20 save a lot of money, I think, wouldn't it? So,
21 well, I just would like to that to be considered.
22 MAYOR EUILLE: Thank you. David

1 Cavanaugh, Philip Hocker.
2 MR. CAVANAUGH: Hello, I'm Dave
3 Cavanaugh and I'm representing myself. I'm a
4 citizen of Alexandria. The Potomac Yard property
5 is underutilized and I support efforts to locate a
6 Metrorail station at Potomac Yard.
7 The DEIS and the alternative proposals
8 have significantly changed since it was released
9 for public comment on April 3. City and federal
10 officials have mutually agreed that only
11 Alternatives A and B are financially feasible. In
12 addition, the National Park Service has given
13 notice it would not object to the City's preferred
14 Alternative B and they have reached an agreement
15 on a package of land trades to help mitigate some
16 of the damage to the parkway.
17 In effect, the recent announced
18 agreements have negated the DEIS that's currently
19 out for public comment. I ask that the following
20 steps be taken:
21 The DEIS be amended to incorporate the
22 new information dramatically changing the

1 alternatives being considered and measures for
2 mitigating impacts to the parkway.
3 2) The mayor or city manager make a
4 public announcements on terms of a proposed
5 agreement with the National Park Service and other
6 cooperating federal agencies.
7 3) The city staff should delay
8 announcing their preferred alternative until they
9 have considered comments from citizens.
10 4) The city should provide more detailed
11 information on the proposed agreement with the
12 National Park Service and the commitment of $12
13 million for improvement of the Mount Vernon Trail
14 and Dangerfield Island.
15 The city staff selection of a preferred
16 site prior to the deadline for comments is an
17 attempt to derail public involvement and limit
18 consideration of other alternatives. During a
19 month we celebrate Earth Day, it is ironic that
20 city and federal officials take steps in the
21 middle of a DEIS to short-circuit public
22 involvement. This is an important project for the

1 future of Alexandria and it's something that we
2 should move ahead on but in an appropriate way.
3 Thank you.
4 MAYOR EUILLE: Thank you. Philip
5 Hocker, David Dunn.
6 MR. HOCKER: Thank you. My name is Phil
7 Hocker. I've lived in Potomac West since 1987 and
8 I'm an architect. I'm not representing any
9 organization. I have to say, Mr. Mayor,
10 congratulations on running a smooth hearing. I
11 think you must be sitting there -- you can't say
12 this -- you probably can't even respond when I say
13 this, but it must challenge you to realize that
14 there are two people who would like to have your
15 job instead of having you continue. Thank you.
16 I believe that Alternative -- and I
17 thank you for starting the clock until now. I
18 think that's sort of more than fair.
19 I really think that Alternative A should
20 be pursued. The problems with Alternative A are
21 the result, frankly, of ill-advised history of
22 planning decisions made by the City over the last

1 30 years. The Alternative A site was identified
2 in the 1970s as the expected site for the station
3 between Braddock Road and the airport. The buyers
4 in Potomac Greens certainly, as been noted before,
5 should've been fully aware that this was coming.
6 Will a construction be a problem? I'm
7 an architect, I've managed construction, yes,
8 it'll be a problem for a while, but after that,
9 their homes will be much more valuable if
10 Alternative A is built. Alternative B faces a
11 number of risks and problems, legal and financial,
12 that are not fully identified. Others have spoken
13 to that, but I think the point that's been made
14 that for the EIS to be released and then shortly
15 afterward for city staff to release a separate
16 document that includes a very sketchy outline of a
17 deal with the Park Service means that the EIS is
18 not complete, and frankly, actually, one might say
19 pointedly, bypasses some important information
20 that should be included.
21 If I were the National Park Service,
22 before I agreed to give up land that is theirs

1 now, in return for promises from the City, I would
2 want some commitment or some sense that I could
3 rely on those promises, unlike, for example, the
4 Eisenhower Connecter. The City has some history
5 of making promises to other agencies and then not
6 coming through. In this case, it shouldn't
7 happen.
8 I think the City does have a moral debt
9 to the parkway and we should fulfill it. There's
10 no need to take parkland for this to deal with the
11 problems the city planning decisions have created.
12 Over time, the problems that people anticipate
13 with Alternative A will settle out. The revenues
14 to the city will level out over time. The highest
15 and best use for the areas immediately around,
16 whichever location is selected, will be built out
17 and the City tax revenues will work out.
18 If there are short-term zoning issues,
19 frankly, those are issues of the City's creation.
20 The City's creation long since the Alternative A
21 location was identified. So I would hope that the
22 Potomac Greens folks would look past the next

1 couple of years and hope that after that time we
2 have a station there that will meet everybody's
3 needs. However, I think that the no-build
4 alternative is a very important choice, and I
5 think that if the folks who were part of the tax
6 district to help pay for the station don't want to
7 be part of paying for it, if the folks who will be
8 living next to it don't want the benefit from
9 living next to it, then maybe we should just not
10 build it.
11 Thank you very much for your
12 consideration.
13 MAYOR EUILLE: Thank you. David Dunn,
14 Ariana Sekulow.
15 MR. DUNN: Hi, Mr. Mayor. Thank you for
16 letting me speak. My name is David Dunn. I live
17 in the neighborhoods. In fact, I kind of have a
18 unique perspective, living in our area. For the
19 last 20 years, I've lived in Potomac Crossing,
20 Potomac Greens, and Old Town Greens.
21 I'd just like to say that I really,
22 really know the neighborhood and it's been a

1 really great location for me to live in the fact
2 that I'm someone that requires a vehicle to go to
3 work, and living, essentially, one, now two
4 traffic lights from Washington, D.C. has really
5 been a great thing. I can enjoy all of the
6 attributes of my city as well as commute to work
7 in relatively easy fashion, going to Arlington.
8 As far as a Metro is concerned, I
9 believe a no-build alternative would probably be
10 the best alternative. Having grown up around
11 there, I see the Metro Way as, once completed,
12 being a fine commuter rapid transit between
13 Braddock Road and Crystal City.
14 I have a number of concerns with the
15 build alternatives and I guess the most important
16 one is a walkway at the most northern end of our
17 neighborhood that will certainly cause a lot of
18 issues with traffic density. I believe that we'll
19 have to probably get parking permits for our
20 vehicles. Obviously, anyone that has Google Maps
21 will know that the east side of the train tracks,
22 the best place to Kiss and Ride, will be our

1 neighborhood. The Potomac Greens area, the Old
2 Town Greens area, Potomac Crossing will certainly
3 be impacted to a huge degree on Slater's Lane as
4 well. You may or may not know that Slater's Lane
5 has progressively gotten worse and worse during
6 rush hour traffic. And I haven't seen anyone talk
7 about improvements to how Slater's Lane accesses
8 the George Washington Memorial Parkway. I also
9 have a number of issues with mitigation. I
10 believe that that the GW Parkway should not be
11 encroached on, as many other people have talked
12 about.
13 I believe that the visual aesthetics of
14 the George Washington Memorial Parkway should
15 outweigh a majority of other reasons. Again,
16 that's really all I have to say that I can think
17 about right now, but I do stand for a no-build
18 alternative. And if an alternative is considered
19 -- a build alternative is considered that we think
20 about the folks in the neighborhood and what this
21 will do to commuter, as well as pedestrian
22 density. Thank you.

1 MAYOR EUILLE: Thank you. The next
2 speaker is Walter Clark. I apologize. I'm sorry.
3 Arianna Sekulow, then Walter Clark. My apologies.
4 MS. SEKULOW: No, that's okay. Hi, Mr.
5 Mayor and Mr. Ashe. My name is Arianna Sekulow; I
6 am representing myself and my family. Some of you
7 may not be aware that the Potomac Greens
8 neighborhood is a horseshoe, there's only one
9 entrance, in and out, at Slater's Lane. So what
10 has concerned me most about this project from the
11 beginning are issues of safety and crime.
12 I live on the northern-most block of
13 Carpenter Road, near the City Park located in
14 Potomac Greens. Within that one block, bordered
15 by Lyles Lane, down Carpenter Road and back around
16 to Potomac Greens Drive, by my count, there are at
17 least 25 children, 21 of whom are under five years
18 old.
19 This area will feel the greatest effects
20 from the Metro project with construction noise,
21 pollution, both light and other forms, emissions,
22 vibrations, the movement of heavy equipment, et

1 cetera. I am worried for the safety of all the
2 children in the neighborhood, and especially the
3 25. There are more on the west side of Potomac
4 Greens Drive who will be closest to the
5 construction for the next two years -- bless you -
6 - as well as when the Metro station is completed.
7 Another issue of concern is the
8 pedestrian bridge in its current location,
9 connected to Alternative B. Originally, as
10 required by an agreement between the developers of
11 the neighborhood and the city, the pedestrian
12 bridge was to be located more towards the entrance
13 of Potomac Greens near the traffic circle and was
14 never to be part of the Metro station. It was
15 intended to connect Potomac Greens with Potomac
16 Yards, as has been stated many times.
17 Now, the new proposed location of the
18 bridge and its connection with the Metro station
19 will give individuals open access, 24 hours a day.
20 Our neighborhood will now have a means for
21 criminals, and other people, to enter and exit our
22 neighborhood from the north, something they do not

1 have right now. In the event of a crime,
2 emergency personnel would have to drive to the
3 northern end of the community, and quite literally
4 run after a perpetrator.
5 I work at home and when I venture out in
6 the daytime, either by myself or with my two
7 girls, who are three and-a-half and 14 months old,
8 I'm lucky that I get to do it in my community.
9 During the day, there is almost no one around.
10 Those who are out are parents and/or childcare
11 providers and dog walkers. It's a quiet, isolated
12 neighborhood and there is often no one around my
13 children and me as we play outside. If somebody
14 wanted to commit a crime, it would be easy.
15 With easy access from a Metro stop and a
16 bridge, it's not a stretch to think that crime
17 will become a persistent problem. It would be
18 great to believe that nothing nefarious will
19 occur, but that's not realistic. Historically,
20 where there is a Metro stop, there is an increase
21 in crime. My Association covenants also indicate
22 that the residents of Potomac Greens will be

1 responsible for 50 percent of the maintenance and
2 upkeep of the bridge when it is complete.
3 So what will be the cost of the bridge
4 to construct?
5 What will be the annual maintenance cost
6 since the bridge will have both escalators and
7 elevators, according to renderings?
8 Will it be possible to make the bridge
9 secure by using a keypad or a fob access?
10 What are the plans to keep the
11 neighborhood and the children safe?
12 These are all important questions that
13 need to be answered before the first pylon is
14 driven into the ground. And as we are talking
15 about a no-build option, perhaps, it's possible to
16 consider it and to take some of the money that
17 we're considering for this Metro station and put
18 it into Alexandria City schools. Thank you.
19 MAYOR EUILLE: Thank you. Walter Clark,
20 last speaker.
21 MR. CLARK: Good afternoon. Thank you
22 very much for having me. I'm Walter Clark; I'm

1 the 2015 Chair of the Alexandria Chamber of
2 Commerce and I'm here representing the Chamber of
3 Commerce this evening.
4 As a part of the Alexandria Chamber of
5 Commerce 2015 legislative agenda, which is made up
6 of some of the business leaders and citizens of
7 Alexandria and business owners, the Chamber Board
8 of Directors identified the Potomac Yard Metro as
9 a primary focus item of the legislative term. And
10 briefly, to review that, Alexandria primary
11 opportunity to realize economic development
12 necessary to balance and grow the tax-based lies
13 within Potomac Yard.
14 Redevelopment of the Potomac Yard will
15 create a vibrant mixed-use community, residents,
16 hotels, office, retail and open space, all
17 significant economic benefit to the city. It will
18 enable the city to compete for existing and future
19 federal and other large commercial users.
20 Their presence in Alexandria will help
21 rebalance our tax base. The Potomac Yard and
22 Potomac Yard North coordinate development district

1 plans contemplate and depend on the Metro service.
2 Constructing a new Metro station at the Potomac
3 Yard is critical to the successful redevelopment.
4 We formally endorse the City's
5 professional staff recommended position of
6 locating the new Potomac Yard Metro at Alternative
7 B, as soon as possible. If Alexandria is to make
8 itself competitive in a significant future
9 commercial real estate, opportunities of building
10 the Potomac Yard Metro and selecting Alternative B
11 is the most critical course of action.
12 The Chamber would also like to applaud
13 the City on identifying the multiple funding
14 sources in order to pay for the Potomac Yard
15 Metro. We would like to endorse the current
16 financing plan that had been proposed and would
17 encourage you to continue to apply that financing
18 strategy to future transportation projects around
19 the city.
20 I thank you very much for your hard
21 work. Thank you.
22 MAYOR EUILLE: Thank you. We also have

1 another speaker, John Schrader.
2 MR. SCHRADER: Hi, I'm John Schrader. I
3 live at 1840 Potomac Greens. And if you look on
4 the neighborhood map, you'll see we're right in
5 that last row of the townhouses on the lead end,
6 very much impacted by several of the build
7 options.
8 My wife and I chose to live in
9 Alexandria, we reside at 1840 Potomac Greens
10 Drive. After spending almost 30 years in the
11 military, for the first time, we got to choose
12 where we were going to live and we chose
13 Alexandria. And in Alexandria, we chose the
14 Potomac Greens neighborhood. We acknowledge the
15 potential station was in the future and it was
16 explained to us when we bought our home. What was
17 not exactly clear were the proposed locations. It
18 was very difficult - more difficult than some
19 might let on, to find out where and when things
20 were going to happen.
21 Since then, we've experienced every
22 combination of getting from Point A to Point B in

1 the metro area. We believe that the multiple
2 means to get around make a metro station rather
3 unnecessary. Any time I wish to catch a metro
4 train, I have several ways to rapidly and cheaply
5 get to Braddock Road.
6 Our Homeowners' Association even
7 provides a rush hour shuttle service to the
8 station as they're required to do something with
9 money set aside for transportation funding from
10 our fees. So from our perspective, why a Metro?
11 Noting that the good of the many
12 outweighs the needs of the few, Alternative B is
13 the only option that we can support. Alternative
14 A and D clearly do not meet our expectations of
15 having chosen Alexandria as our home.
16 Today, I can look out my kitchen window
17 and see trees and parks and even some close
18 neighbors across the way in the new developments.
19 Alternative A means instead of sipping my morning
20 coffee and looking out my window on an attractive
21 vista, I will see thousands of my closest friends;
22 conversely, they can see me, not something either

1 of us want.
2 Alternative B is the answer if there is
3 truly a compelling need and believable business
4 case to grow our city. Mitigating constructing
5 impact is extremely important. Beyond the traffic
6 and noise of construction, Potomac Greens Drive is
7 a single access road and any drop-off or Kiss and
8 Ride is ill advised. The notion that the station
9 is good for the neighborhood is certainly suspect,
10 but any access from Potomac Greens should be
11 strictly limited to residents. We believe that we
12 would use a Metro station if it were there, but
13 the impact on the neighborhood is vastly
14 overstated and has very little impact on me.
15 And finally, one of the issues everyone
16 says my property values will go up. I have to
17 tell you, I don't care because I plan to be here a
18 very, very long time. Thank you for your time.
19 MAYOR EUILLE: Thank you. Susan Coad.
20 MS. COAD: Thank you for allowing me to
21 speak. My name is Susan Coad. I live at the
22 Eclipse, which is in Alexandria. We're just north

1 of Four Mile Run, and we are a high rise that is a
2 condo, which has 465 units, approximately 1,000
3 residents. We are very interested in seeing the
4 Metro go in and we're very happy with what
5 Alexandria is doing, in terms of the parks that
6 are just south of us on Potomac Avenue and what
7 we'll be doing, in terms of the mixed-use
8 development at the new Potomac Yard.
9 We understand that the shopping center
10 that is there is not really not going to be taken
11 away, but there will be shopping areas still. I'm
12 sure that's all to be determined yet. In
13 opposition to what people have suggested here
14 about worrying about the crime and the noise, we
15 would, on the other hand, really like to see the
16 Metro move closer to us. And the reason is, many
17 of our residents are commuters, Metro commuters
18 and the closest Metro is a mile away right now. So
19 we would love to have, you know, we don't to walk
20 eight-tenths of a mile to get on the Metro, when
21 we're going towards D.C., we would go a mile to go
22 into D.C. to Crystal City.

1 But if this Metro were moved closer to
2 us, it would be better for us and it would make
3 our residents happy. Now, across the street from
4 us there's another residential building, which
5 also has a similar population, the Camden. And
6 then someone mentioned the National Gateway
7 Building, which is also across the street from us
8 and it was available for five years and hadn't
9 been filled in. But my understanding is the
10 reason for that was that it was built for the EPA
11 -- and I forget how you describe it -- but it was
12 leads and all that stuff for the EPA, and the EPA
13 decided not to be there, so there was a lawsuit
14 going on for five years and that's why it wasn't
15 rented. I don't know if that has something to do
16 with your consideration, but anyway, we would love
17 to have the Metro move closer to us. Maybe there
18 is a way Arlington would help out with that
19 because the streetcar has been cancelled and maybe
20 that money can go to help out. That's my
21 suggestion.
22 MAYOR EUILLE: Thank you. Any other

1 speakers who did not sign up. Written testimony,
2 please see Ms. Pena. Hold on one second.
3 MR. EISELE: Six minutes. All right.
4 MAYOR EUILLE: No, no. Thirty seconds,
5 actually. All right. We've got it corrected now.
6 You did not sign in, right?
7 MR. EISELE: I did not sign up.
8 MAYOR EUILLE: So you need to -- does he
9 need to do that before he speaks?
10 MS. PENA: No.
11 MAYOR EUILLE: Okay.
12 MR. EISELE: Go to her after?
13 MAYOR EUILLE: Yeah. Give your name and
14 everything and then check in afterwards. Thank
15 you.
16 MR. EISELE: Okay. My name is Scott
17 Eisele. I live at 200 East Glebe Road. Sorry to
18 be here late and keep everyone late. I wasn't on
19 planning on speaking, but after hearing a lot of
20 things, I just figured I'd voice my comments as
21 well. I've lived in the area for 10 years. Lived
22 on East Glebe for six years, and I've been aware

1 of the Metro station almost since I've moved to
2 the area. I know it's been slow moving, but I
3 felt it's been easy to get informed on the process
4 and I periodically will check and see what's going
5 on and I'm grateful for the websites. I think
6 either the A or the B alternatives are great.
7 My only objection to the D alternative
8 is the cost, but I am definitely pro-build. I
9 think there are benefits to property value. The
10 one concern, I guess I would have is East Glebe
11 Road is already busy. I understand overall
12 traffic is projected to go down; however, with
13 locally, the traffic would likely go up on East
14 Glebe with more people going to the Metro. And I
15 don't want to add any large costs to the project,
16 but just a consideration of gee, can you do speed
17 bumps or some sort of traffic mitigating measure
18 to maintain traffic on East Glebe? Similar sort
19 of concern with parking, you know, parking
20 restriction, similar to what they have at Braddock
21 with three-hour blocks. Otherwise, that was mu
22 comment. Thanks. And I think a build option is

1 good.
2 MAYOR EUILLE: Thank you. Any others?
3 Yes. Go ahead.
4 MS. FITCH: No, I respect the elders.
5 Please go ahead.
6 MR. MELTON: I will do the paperwork
7 later on, but I just want to make a brief
8 statement. I'm Jim Melton at 105 Harvard Street.
9 I've lived there since 1975.
10 What I want to say is that after I've
11 heard everybody speak, or most the people who were
12 speaking, I haven't heard any comments about all
13 of the people who will use this station who are
14 coming from other parts of the area: coming from
15 Huntington and so forth, or coming through the
16 city who will see the new station but won't get
17 off. I'm thinking they're probably are not for
18 this station because if they're coming through the
19 city, they want to get to work, quickly and this
20 new station will slow them down.
21 Now, we may not think that that would be
22 a significant point, but for many people who use

1 the Metro -- and I use it just about every day --
2 it's important to get on the Metro to get to one
3 place that you want to go to quickly.
4 I will repeat myself again, I think when
5 the new station is built, and it probably will be
6 built, I think it's going to arouse some
7 resentment that the thousands of people who will
8 use it coming through the city were never asked
9 their opinions about whether they wanted the
10 station or not. Thank you.
11 MS. KING: Hello. My name is Betty King
12 and I have lived in Hume Springs Arlandria for 31
13 years now, and I'm speaking only for myself. But
14 I was looking forward to a new Metro station. And
15 in fact, I was hoping for Alternative D, one of
16 those farther north because of all the people who
17 live in Arlandria and Len Haven, who have no
18 convenient access. Someone, you know, in Potomac
19 Greens can get down to Braddock pretty easily, but
20 we have very little access to the Metro. So it
21 would become a walkable to us, a little over a
22 half-a-mile. I think someone said about .7 miles.

1 So I just wanted to say that some of us, you know,
2 I think that Alternative D is good because any
3 Kiss and Ride would be on the, you know, Potomac
4 Yard side and we wouldn't have to go over those
5 little bridges or whatever. Thank you.
6 MAYOR EUILLE: Thank you.
7 MS. FITCH: Thank you for letting me
8 speak. My name is Andrea Fitch and I reside in
9 Del Ray. I actually bought my house in the early
10 '90s. In fact, the late Nancy Dunning was my
11 listing agent and in her being the listing agent,
12 I had the unique opportunity to kind of get some
13 sense of what was going to be envisioned for
14 Potomac Yard, and that included the relocation of
15 the train tracks and Metro stations and whatnot.
16 I personally, as a resident, and I'm
17 here to represent myself, I am in support of
18 Alternative B. I have been in commercial real
19 estate for all of my career and I understand the
20 economic impact, and something like this is very
21 important.
22 I have family that actually hails from

1 Europe, so I think one of the things that has kept
2 me a continued resident -- I was born and raised
3 here, actually -- but it has kept me here is
4 because, like my mother, who is from Europe, it's
5 this concept of the convenience of being able to
6 get to places and not be so dependent upon
7 vehicles and cars, which we know has a very
8 negative impact on the environment, not only in
9 the fact that we still are burdened and dependent
10 upon oil, but we're not finding more progressive
11 ways of getting out that conundrum, if you will.
12 But, nonetheless, Alternative B, to me,
13 makes the most sense because it straddles both the
14 Potomac Yard, as well as the north section of its
15 development. It will allow us, in terms of a
16 city, to gain capacity for development that
17 actually turns into taxpayer money, in terms of
18 the businesses that are going to there with the
19 redevelopment of that shopping center.
20 I mean I know when I went to the
21 previous forums that were open to the public, I do
22 understand that Target is already committed to

1 anchoring themselves in the redevelopment of North
2 Potomac.
3 So you already have a prominent -- and I
4 think even this Target, as we call it, is actually
5 the most highly trafficked Target in all of North
6 America. So of course, they're going to want to
7 keep it here. So the development is there and I
8 think Virginia, unlike Maryland, who is hemming
9 and hawing, we're demonstrating the fact that
10 we're going to be progressive and that we're going
11 to look at ways to be different, be more
12 efficient, be environmentally conscientious, and I
13 think that's something that is really to be
14 applauded here.
15 The one thing that I do add as a caution
16 is, and one of our neighbors brought it up, was
17 the fiscal, the overruns, the cost overruns. The
18 city is being a financial to this and I think
19 instead of turning everything over to WMATA is to
20 allow some kind of consortium of oversight that
21 includes the city to be part of the decision-
22 making in the design build component of this

1 station being brought online. And I think that it
2 would behoove us -- it would be unprecedented, but
3 I think if the city could somehow be part of that
4 process, I think we, as neighbors, would feel more
5 confident that the cost overruns will not happen.
6 Thank you.
7 MAYOR EUILLE: Thank you.
8 MR. ROSEBOOM: Good evening. My name is
9 Tim Roseboom; I'm with the Department of Rail and
10 Public Transportation. I had not signed up to
11 speak. I didn't originally intend to speak, but
12 I'd like to associate myself and our agency with
13 the comments of VRE, Mr. Bryan Jungwirth. We are
14 in support of Alternative B. We will be
15 submitting written comments through the state in
16 favor of Alternative B. We are also opposed to
17 Alternative B-CSX. Thank you.
18 MAYOR EUILLE: Thank you. Others?
19 (No response.)
20 Well, we're supposed to be here until 10:30, so
21 you're welcome to continue to sit with me and my
22 colleague here until then, but we can also pull

1 the plug or stop the train, one or the other.
2 According to my watch, it's 8:25, so
3 I'll wait until 8:30 to officially conclude.
4 Those who are getting up to leave, we thank you
5 for being present with us this evening.
6 I'm just going to recite this one more
7 time, additional comments may be submitted to, and
8 this is an e-mail address at
9 writtentestimony@wmata.com or
10 comments@potomacyardmetro.com or in writing to
11 Board Secretary, 600 Fifth St, Northwest,
12 Washington, D.C. 20001 or to Potomac Yard
13 Metrorail Station EIS, PO Box 16531, Alexandria,
14 VA 22302. Comments must be received by 5:00 p.m.,
15 May 18th.
16 (Whereupon, at 8:30 p.m., the hearing
17 was adjourned.)
18 * * * * *
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21
22

CERTIFICATE OF NOTARY PUBLIC

I, GERVEL A. WATTS, the officer before whom the foregoing public hearing was taken, do hereby certify that the testimony that appears in the foregoing pages was recorded by me and thereafter reduced to typewriting under my direction; that said deposition is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this testimony was taken; and further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

_____
GERVEL A. WATTS
Notary Public in and for the
Commonwealth of Virginia

My commission expires: October 31, 2016

Registration No.: 346197

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APPENDIX F

Comments Submitted for Public Record (without annotations)

Comment ID 010

First Name Craig

Last Name Caldwell

Organization Amtrak

Collection Method
Email

Commenter Type
Business

Comment
See copy of comment starting on following page

NATIONAL RAILROAD PASSENGER CORPORATION
30th Street Station, Philadelphia, PA 19104

May 12, 2015

Potomac Yard
Metrorail Station EIS
PO Box 16531
Alexandria VA 22302

RE: Amtrak Comments
Metro Rail Draft EIS

Dear Sir/Madam:

Amtrak has reviewed the Draft Environmental Impact Statement for the Potomac Yards Metrorail Station. 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.

Thank-you for your consideration of our comments.

Sincerely

Craig M Caldwell
Senior Manager, Environmental

cc: D. Galloway
M. Sherlock

Comment ID 011

First Name Kevin H.

Last Name Posey

Organization Global Sustainable Transportation Advocacy Alexandria

Collection Method
Email

Commenter Type
Non-profit / Community Organization

Comment
Dear Sir/Madam:

Some colleagues 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.

As a past chair of this same Commission, co-writer of Alexandria's Complete Streets policy, and originator of the DC region's Complete Streets policy (via the TPB's CAC), 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.

Thank you for your attention.

Kevin H. Posey
Global Sustainable Transportation Advocacy Alexandria, VA, USA

Comment ID 012

First Name Alan

Last Name Page

Organization

Collection Method
Email

Commenter Type
Individual

Comment
Subject: Building Alternative A is the Most Sensible Choice:

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. The money save 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.

Comment ID 013

First Name Todd

Last Name Neison

Organization

Collection Method
Email

Commenter Type
Individual

Comment
Hi - 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 only make sense if one neighborhood did NOT have direct walkway access to the station.

Thanks, and again 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.

Todd Neison

Comment ID 014

First Name John

Last Name Woodmaska

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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.

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. 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.

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. 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!
John Woodmaska

Comment ID 015

First Name Timothy

Last Name Yuskavage

Organization

Collection Method
Email

Commenter Type
Individual

Comment
I am a resident of Alexandria VA.

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.

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.

I fear that Alternative B-CSX would run into delays and cost overruns associated with the extra engineering work.

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.

Attention should be paid to proper integration of the Potomac Yard Station (presumed station name) and the Metroway bus system.

Timothy Yuskavage

Comment ID 016

First Name Zach

Last Name Ferguson

Organization

Collection Method
Email

Commenter Type
Individual

Comment
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.

Thank you for your time,

Zach Ferguson

Comment ID 017

First Name Jeff

Last Name Larrimore

Organization

Collection Method
Email

Commenter Type
Individual

Comment

Dear member of the Potomac Yard Working group,

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 president for this nature of discussion in the EIS for new Metrorail stations, as a 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.

If you have any questions about this concern, or require additional information, please do not hesitate to contact me.

Best regards,

Jeff Larrimore
Alexandria, VA 22314

Comment ID 018

First Name Timothy E

Last Name Curley

Organization

Collection Method
Email

Commenter Type
Individual

Comment

METRO WILL TRANSFORM PY FROM A PASS THROUGH NEIGHBORHOOD TO A COMMERCIAL, RETAIL, AND RESIDENTIAL HUB

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 this is that this 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 destination, like Clarendon or Old Town. Sadly, but for the Movie Theaters and Target, Potomac Yard is currently an area that people drive through. The Metro will make Potomac 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.

Thank you for your consideration and hard work on this.

Timothy E. Curley

Crowell & Moring LLP | www.crowell.com

Washington, DC 20004

Comment ID 019

First Name Harriet A.

Last Name Welch

Organization

Collection Method
Email

Commenter Type
Individual

Comment
Tell me what to do!

Comment ID 020

First Name Carol

Last Name Eisenmann

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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 stations 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.

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.

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.

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 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 have 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. The expensive bus lane was put in on route 1 - that should suffice.

Carol Eisenmann

Comment ID 021

First Name Jonathan

Last Name Krall

Organization

Collection Method
Email

Commenter Type
Individual

Comment
Greetings!

I am writing to support the Potomac Yard Metro Station, with option "B" being my preference. 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.

Thank you for your attention.

Jonathan Krall
Alexandria, VA 22301

Comment ID 022

First Name Kim

Last Name Neison

Organization

Collection Method
Email

Commenter Type
Individual

Comment
Good Afternoon,

I live in the Potomac Yard neighborhood and I think the proposed Potomac Yard Metro stop will be a great addition to Alexandria. 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.

Thank you,
Kim Neison

Comment ID 023

First Name Mark

Last Name Goode

Organization

Collection Method
Email

Commenter Type
Individual

Comment
See copy of comment starting on following page

Preliminary Comment on City of Alexandria Proposed Potomac Yards Metro Station Alternative B Location
Traffic Noise Concerns

April 29, 2015

Executive Summary

On April 24, 2015, the City of Alexandria staff recommended Alternative B as the location for the proposed Potomac Yards Metrorail station. As stated on the first page of the staff recommendation, "Staff has determined after much analysis that Alternative B best balances land use and transportation, is consistent with City plans, and places the station in the best location to serve the largest number of potential Metrorail riders."[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.

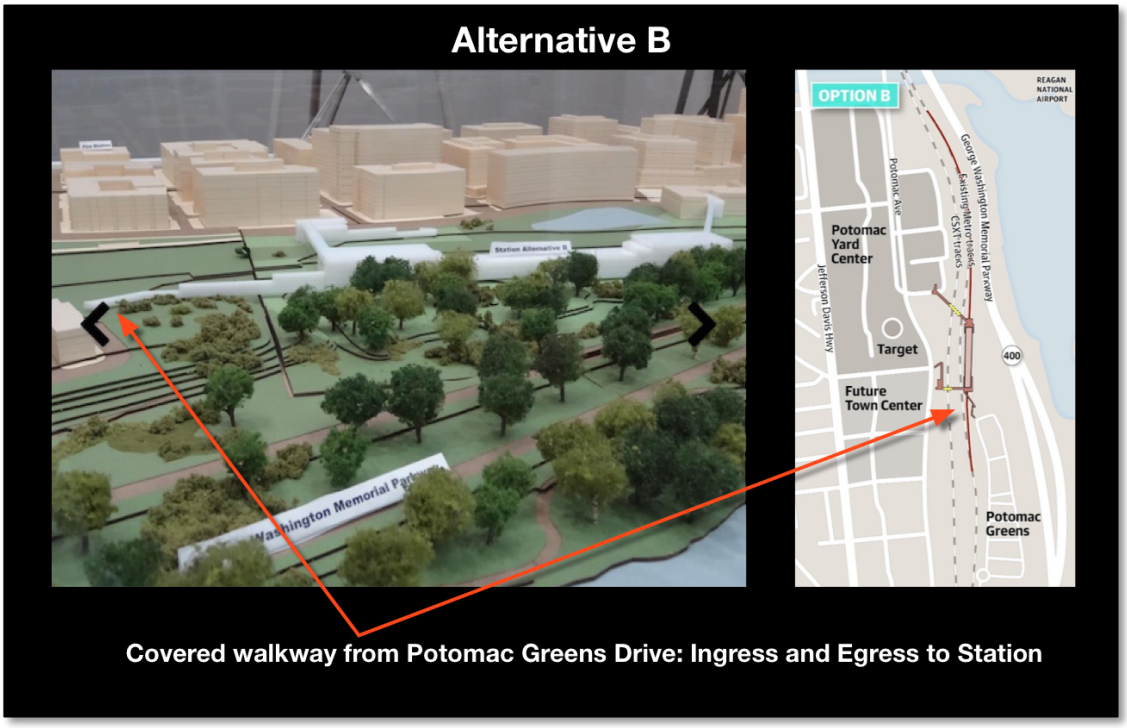
<u>Of equal concern, a preliminary audio analysis shows that the "loudness" level of noise from traffic alone could increase by 8 times, resulting in a greatly diminished quality of life, potentially property values as well, and possible health hazards.</u>

The balance of this document explains how this audio analysis was performed, what instruments were used, where the readings were taken, the audio metrics that were employed to compare the readings, and concludes with suggestions the City Staff consider as a means of addressing these problems.

The Problem Statement

This analysis was conducted based on the published and proposed design and location of Alternative B for the Potomac Yards Metrorail station. This design is shown in the graphic below:

[1] Page 1, http://alexandriava.gov/uploadedFiles/2015-04-24%20Staff%20Report_w%20appendices.pdf



Though the City Staff has stated "the station will not have suburban-style park-and-ride or kiss-and-ride lot"[2], even a cursory study of the traffic patterns of Braddock Station show that the presence of a "lot" has virtually no impact on traffic volume or station use. As a practical matter, because parking at Braddock Station is so limited, commuters require only a drop off and pick up point. They do not require a parking lot to use the station.

Alternative B also includes a covered walkway that invites use of the ingress/egress point at Potomac Greens Drive during inclement weather. In fact, based on the proposed design, a commuter leaving a car stopped at the curb need walk less than 10 meters in the weather before finding shelter in the covered walkway.

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.

[2] Page 18, http://alexandriava.gov/uploadedFiles/2015-04-24%20Staff%20Report_w%20appendices.pdf

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.*

The map below illustrates how commuters in rush hour traffic could use the proposed Alternative B Potomac Greens ingress/egress point as a means of avoiding congestion on Route 1:

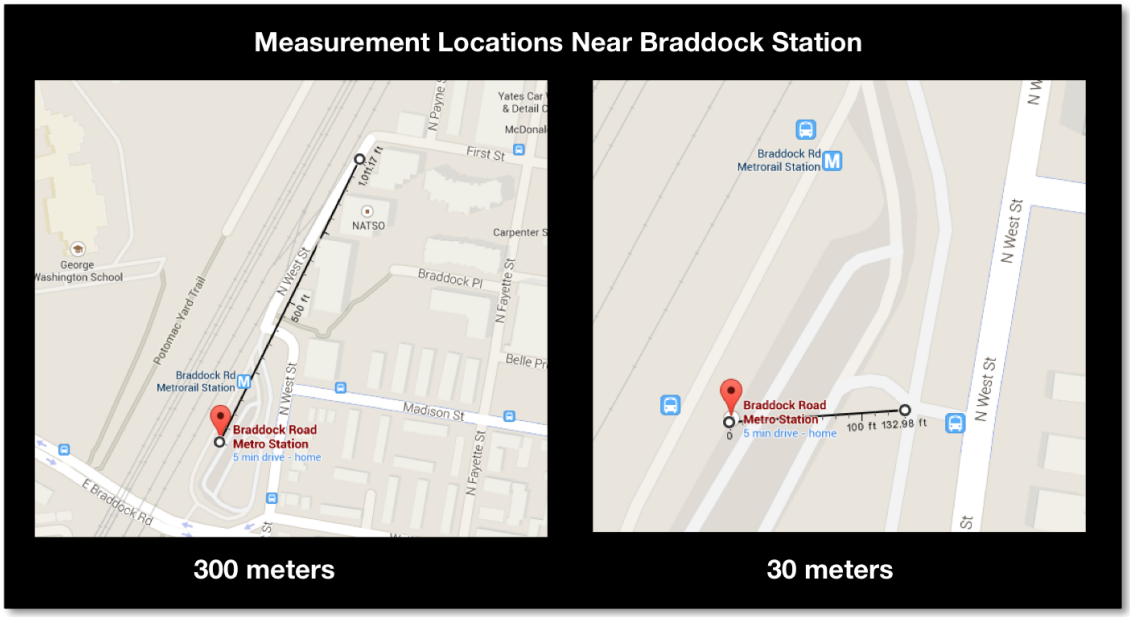
Using this alternative route enables commuters from north Old Town to avoid having to cross the already congested Monroe Ave Bridge in order to reach the Potomac Yards station. And even commuters who live in neighborhoods south of Old Town off George Washington Parkway, this path is much faster than using Route 1 for north-south transit during rush hours.

Measuring Traffic Noise: Location

The author of this study chose to use the Braddock Metrorail station and environs as a proxy for the traffic sound/noise that could be generated around the proposed Potomac Greens ingress/egress point. The reason for this is that the Braddock Station is used by commuters who frequently arrive by means of some form of automotive transport: car or bus. Some commuters walk to the station while other bike. But the majority arrives by means of some form of automotive transportation.

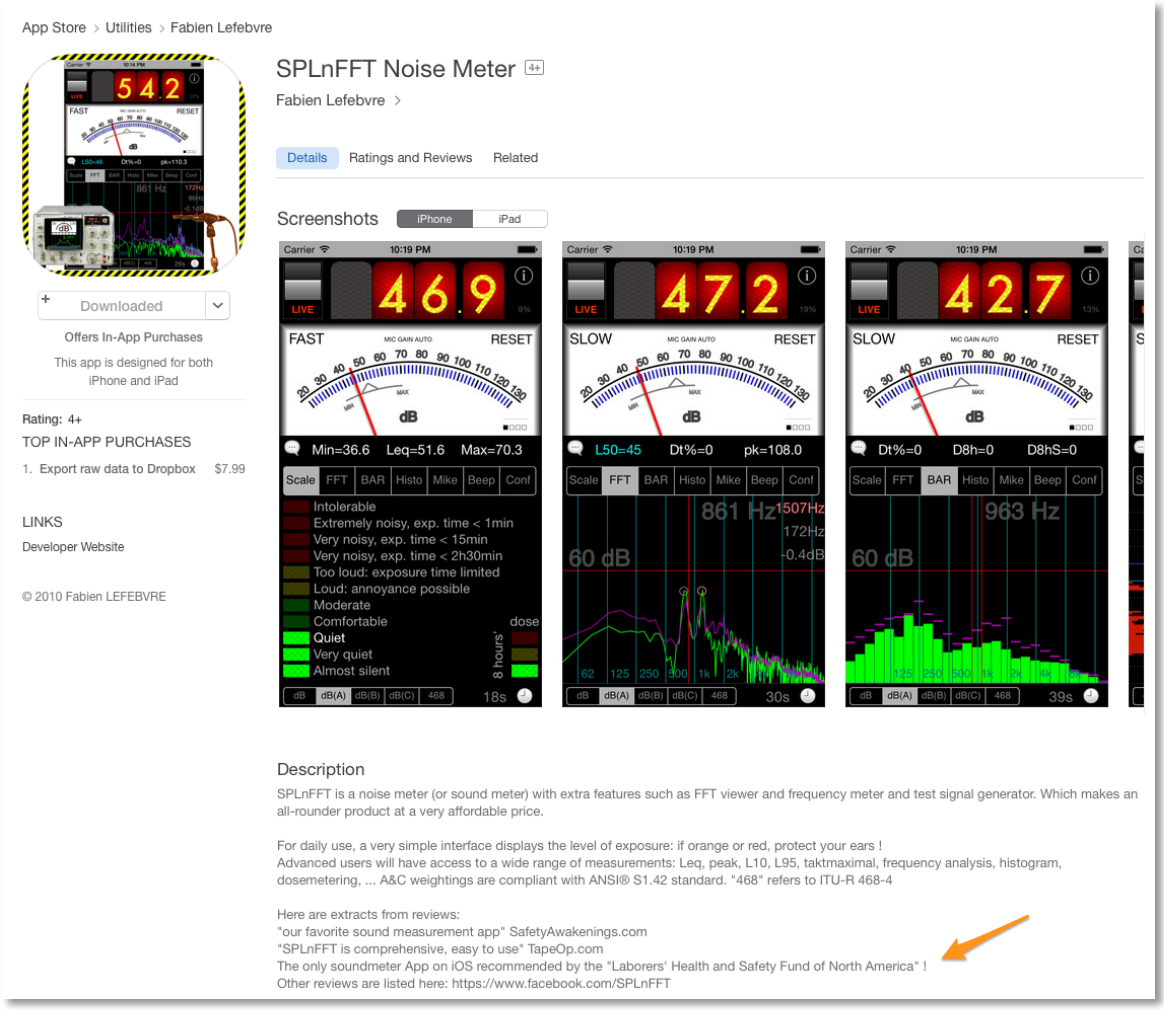
Additionally, the behavioral pattern of the riders closely approximates that of what could be expected at the Potomac Greens ingress/egress point: the commuters arrive by car or bus, depart the vehicle, and walk into the station. Or when returning home, they leave the station, wait for transportation, enter the vehicle, and are driven away.

Two points for sound level measurement were selected: one approximately 300 meters from the Braddock Metro station along a route that approximates in use and design Potomac Greens Drive and one approximately 50 meters from the entrance to the Braddock Station. These two measurement points are shown on the map below:



Measuring the Noise: Instrumentation

The author of this study used a sophisticated audio sensing and metering application available for the iPhone. This app, the SPLnFTT sound meter, is a sophisticated software program that not only measures sound but graphically displays both sound pressure (as measured in Db (decibels)) but graphs the frequency distribution of the sound. Below is a snapshot of the app's screens and information on where more can be learned about this tool:



The testing of traffic and environmental noise was performed at the two locations near the Braddock station. Additionally, noise measurements were taken at the proposed location of the Potomac Yards ingress/egress point. This paper's author operated an iPhone 6+ running the noise measurement application while an assistant videotaped the screen of the author's iPhone 6+.

These multi-minute scans provide a range of data points from which to analyze noise levels. This is important because traffic noise is not constant: it rises and falls with each

passing vehicle, the frequencies generated differ, and the rate of traffic varies by time of day. Because this analysis is not correlated with traffic patterns throughout the day at Braddock Station, the author chose a high traffic time (approximately 5:30 pm on a Tuesday) for sampling. A more comprehensive study needs to be done that analyzes and correlates traffic activity with noise generation. That being said, *this particular sample is relevant because it represents the kind of traffic and noise present at a convenient ingress/egress point at an urban Metrorail station.*

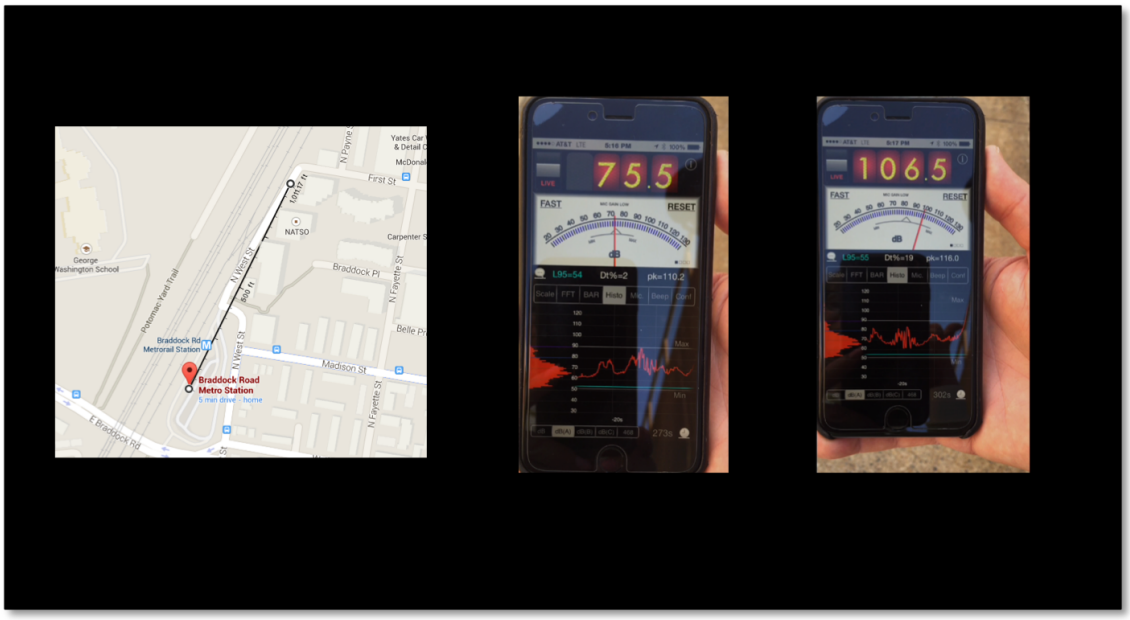
As will be discussed later in this paper, there are a variety of ways to interpret sound measurements (particularly as it relates to human hearing) and the frequencies of sounds produced have different propagation properties. Low frequency sounds (such as a car engine rumbling) travel farther than high frequency sounds (such as a person screaming or yelling). An analysis of Metro rail traffic using this spectrum analyzer shows frequencies generated across the entire spectrum of human hearing, from low rumbling sounds that can be felt (vibrations) to high pitched sounds generated by metal on metal collisions of rail car wheels traversing rail joints.

As a practical matter, what this means is that the various frequencies of noise generated by both rail and automotive traffic can travel different distances throughout a neighborhood. So while a high frequency sound may not be audible at 300 meters from the point of origin, a lower frequency sound may be detected (or even felt) at distances exceeding 300 meters.

Test Measurements

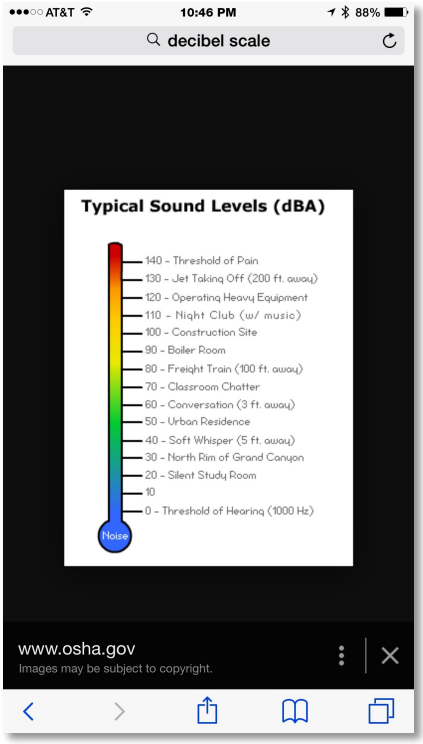
300 Meters from Braddock Metro Station

The first graphic illustrates the nominal noise level and the high noise level of the location 300 meters from Braddock Metro. This location along N. West Street is a major point of automotive ingress and egress to the Braddock station. *Automotive traffic travels at 25 mph, the same speed limit at in the Potomac Greens neighborhood*. This noise sample location is equivalent to a location 300 meters from the proposed Potomac Yard Metrorail ingress/egress point. In Potomac Greens, this would be the location of the clubhouse or Rose Square. The nominal reading shows the mid-point of all noise generated during the sample period. The high reading shows the loudest noise recorded during this sample period.



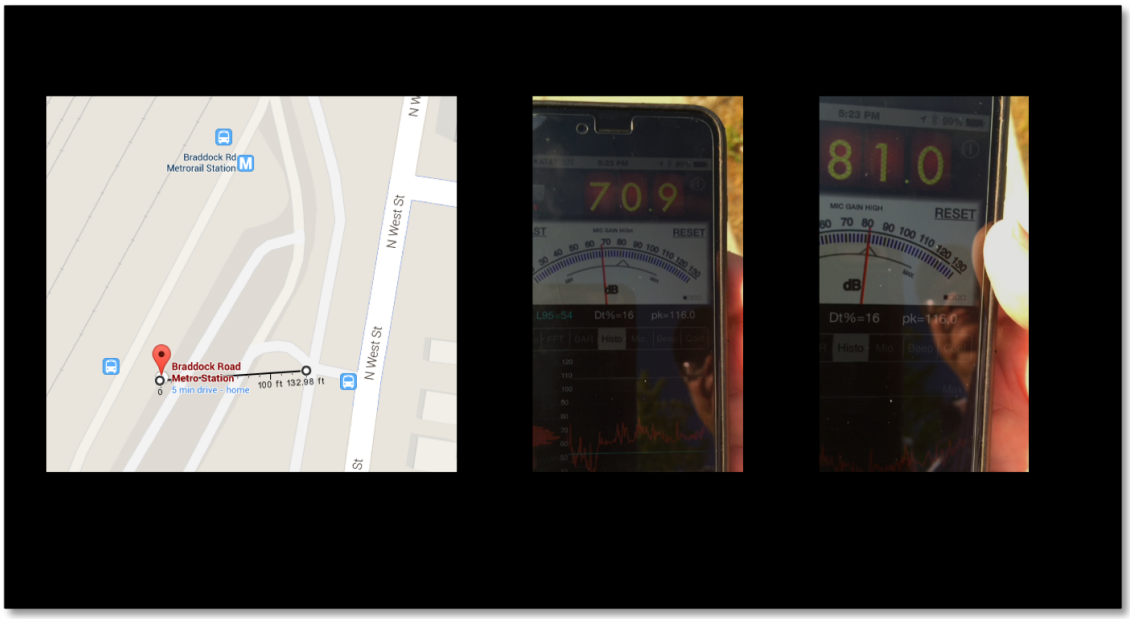
The principal noise sources were automotive traffic and the Metrorail trains. An *automobile* and not the Metro train produced the loudest sound.

The meaning of these sound levels will be discussed later but this graphic from OSHA provides a "first order" interpretation of these recorded sounds and allows the reader to compare the "loudness" of what was recorded with other noise sources:



30 Meters from Braddock Metro Station

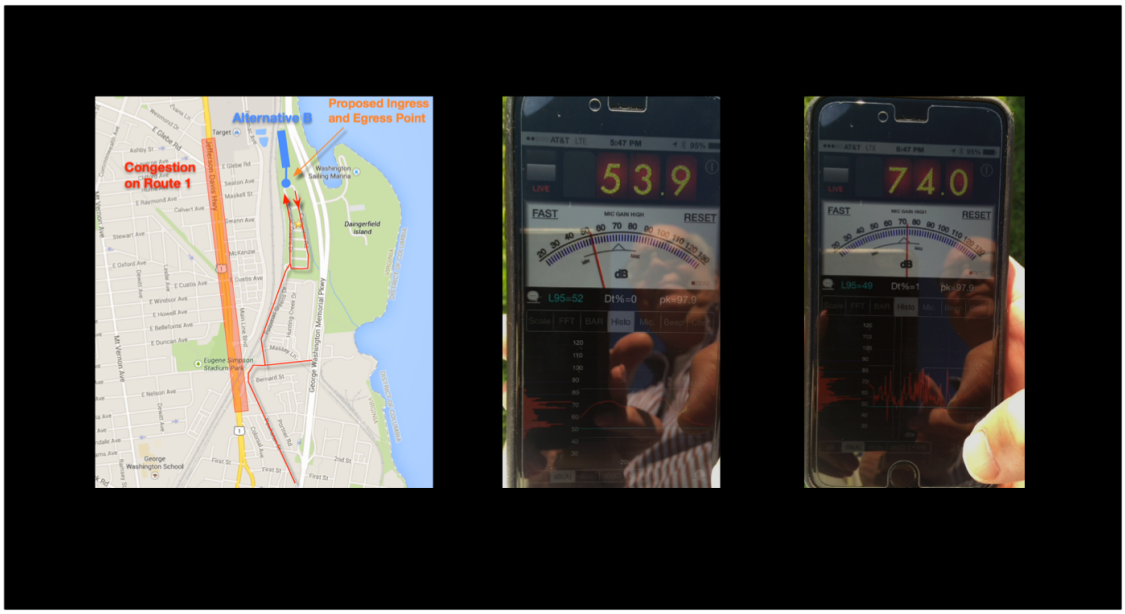
The second graphic illustrates the nominal noise level and the high noise level of the location 30 meters from Braddock Metro station. This location is within the parking area of the station but also near N. West Street.



There were three sources of noise: station announcements, automotive traffic, people talking, sometimes loudly.

Proposed Potomac Greens Ingress/Egress Point: Current Noise Level

The third graphic illustrates the ambient noise level of the proposed Potomac Greens Ingress/Egress Point.



There were two sources of noise: children playing in the park and passing Metro trains.

Interpreting the Test Data

There are two areas that need to be interpreted to derive meaning from these test results.

1. First, the question must be answered: "What is the difference in the "loudness" of the sounds measured in these locations?"

2. Second, how could this affect the quality of life in Potomac Greens?

The Human Perception of Loudness

People perceive "loudness" in ways that are different than when sound pressure or sound intensity are measured. An informative discussion of this can be found at this web site (http://www.sengpielaudio.com/calculator-levelchange.htm).

The following table, extracted from this web site, shows the relative "loudness" of various dB (Decibel) readings. Using this chart enables us to accurately state the relative levels of loudness when comparing the test readings at various locations without ever overstating or understating the differences.

Level change	Volume Loudness	Voltage Sound pressure	Acoustic Power Sound Intensity
+60 dB	64	1000	1000000
+50 dB	32	316	100000
+40 dB	16	100	10000
+30 dB	8	31.6	1000
+20 dB	4	10	100
+10 dB	2.0 = double	3.16 = √10	**10**
+6 dB	1.52 times	2.0 = double	4.0
+3 dB	1.23 times	1.414 times = √2	2.0 = double
- - - - ±0 dB - - - -	- - - - 1.0 - - - - - - -	- - - - 1.0 - - - - - - -	- - - - 1.0 - - - - -
−3 dB	0.816 times	0.707 times	0.5 = half
−6 dB	0.660 times	0.5 = half	0.25
−10 dB	0.5 = half	0.316	0.1
−20 dB	1/4 = 0.25	0.100	0.01
−30 dB	0.125	0.0316	0.001
−40 dB	0.0625	0.0100	0.0001
−50 dB	0.0312	0.0032	0.00001
−60 dB	0.0156	0.001	0.000001
Log. size	**Psycho size**	**Field size**	**Energy size**
dB change	**Loudness multipl.**	**Amplitude multiplier**	**Power multiplier**

The following table compares the baseline *current* nominal and high noise readings of the proposed Potomac Greens ingress and egress point with the noise readings 30 meters and 300 meters away from the analogous point at Braddock Metro Station.

		30 Meter Audio Reading			300 Meter Audio Reading		
	Proposed Ingress Egress Audio Reading	30 Meter Audio Reading	dB Reading Difference	Volume Loudness Difference	300 Meter Audio Reading	dB Reading Difference	Volume Loudness Difference
Nominal	53.9	70.9	17	3.5	75.5	21.6	4
High	74	81	7	1.5	106.5	32.5	8

The conclusions from this preliminary noise analysis are that the noise levels in the Potomac Greens neighborhood, within 300 meters (~ 1000 feet) of the proposed ingress/egress point ***could be 3.5 to 8 times louder than the current noise levels.***

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.

Health Issue

A widely studied phenomenon relating to noise pollution is called the "auditory startle reflex." [3] Caused by sounds that exceed 80 decibels (frequently occurring near Braddock Station), this reflex causes a series of involuntary reactions including eye blinking, muscle tightening, and a rapid increase in heart rate resulting from the release of adrenalin. On going studies with rodents and grey seals have shown that repeated exposure to sounds at this level result in stress-induced anxiety as well as habit changes

[3] http://en.wikipedia.org/wiki/Startle_response

to avoid exposure to such stimuli including avoiding geographic areas that generate these noise levels. In simple terms, repeated exposure to noise at this level seriously degrades the quality of life of the residents and, as the facts surrounding this aspect of the neighborhood become known, can also adversely affect property valuations. Why? Most people do not want to live in an environment with stress and anxiety producing noise.

Courses of Action

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:

1. ***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*.

2. **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 clear line-of-sight view* of the proposed Potomac Yard Metrorail station from along Potomac Greens Drive.

Study author: Mark Goode, Alexandria, VA 22314

Comment ID 025

First Name Corey & Marsha

Last Name McDaniel

Organization

Collection Method
Email

Commenter Type
Individual

Comment
My wife and I are residents at the Eclipse on Center Park in the Arlington part of Potomac Yards, 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. Please consider our comments when deciding which option to pursue - we hope you select B-CSX.

Thank you,
Corey & Marsha McDaniel
Arlington, VA 22202

Comment ID 026

First Name Jol A.

Last Name Silversmith

Organization

Collection Method
Email

Commenter Type
Individual

Comment
Dear Sirs:

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.

Jol Silversmith
Alexandria, VA 22301

Comment ID 027

First Name Kurt

Last Name Flynn

Organization

Collection Method
Email

Commenter Type
Individual

Comment
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.

Thanks,

Comment ID 028

First Name Emily

Last Name Allen

Organization

Collection Method
Email

Commenter Type
Individual

Comment

Hello,
Thank you for all of your hard work in developing plans and sharing your thoughts with the public. I wonder if you can explain the logic behind promoting high density in Alexandria? I'd be interested to hear and take it into account with my own point of view to make sense of what seems like a development frenzy around Alexandria. Here are my two cents:

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. 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 places 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.

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?

Thank you,
Emily Allen
P.S. Please add me to your email updates list.

Comment ID 029

First Name Kory & Diana

Last Name Mertz

Organization

Collection Method
Email

Commenter Type
Individual

Comment
Hello,

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 Road 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 – Rat 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 Road than on any other road, and the E. Glebe Road – Rat 1 intersection is the only intersection predicted to be rated an LOS 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 got 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 Rat 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 Rat 1 etc.

In conclusion, 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.

Sincerely,

Kory and Diana Mertz
Alexandria, VA 22305

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 2/2013

Comment ID 030

First Name Julie

Last Name Matter

Organization

Collection Method
Email

Commenter Type
Individual

Comment
Hello,
I'm an environmental professional that lives in Alexandria and metros to DC daily for work. I'm planning to attend the public meeting tonight, but I just saw this list serv option. Can you please add me to list?

Thank you,
Julie Matter

Comment ID 031

First Name Richard

Last Name Webber

Organization

Collection Method
Alexandria City Government

Commenter Type
Individual

Comment
Councilman Wilson

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.

Thank you,

RICHARD WEBBER
Alexandria, VA 22301

Comment ID 032

First Name Justin

Last Name Marks

Organization

Collection Method
Alexandria City Government

Commenter Type
Individual

Comment

Councilman Wilson

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.

Thank you,

Justin Marks
Alexandria, VA 22301

Comment ID 033

First Name Christine

Last Name Hopkins

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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.

Thank you,

Christine Hopkins
Arlington, VA 22204

Comment ID 034

First Name Mary

Last Name Rust

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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.

Thank you,

Mary Rust
Alexandria, VA 22303

Comment ID 035

First Name Nona

Last Name Kusuma

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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.

Thank you,

Mary Rust
Alexandria, VA 22303

Comment ID 037

First Name Seth

Last Name Heald

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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 definitely do the most to make Potomac Yards a walkable, transit-oriented hub for Alexandria. The extra effort required by City and WMATA staff to ensure that the affected 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 you to choose Alternative B as the site for the station.

Thank you,

Seth Heald
Rixeyville, VA 22737

Comment ID 038

First Name Glenda

Last Name Parker

Organization

Collection Method
Email

Commenter Type
Individual

Comment
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.

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.
Thank you,

Glenda Parker
Alexandria, VA 22303

Comment ID 039

First Name Mark

Last Name Van Tassel

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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.

Thank you,

Mark Van Tassel
Alexandria, VA 22301

Comment ID 040

First Name Paul

Last Name Bickmore

Organization

Collection Method
Email

Commenter Type
Individual

Comment
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 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. Choose Alternative B as the final site for the station.

Thank you,

Paul Bickmore
Alexandria, VA 22314

Comment ID 041

First Name Seth

Last Name Heald

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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.

Thank you,

Seth Heald
Rixeyville, VA 22737

Comment ID 042

First Name Jonathan

Last Name Krall

Organization

Collection Method
Email

Commenter Type
Individual

Comment

Hi All, Thanks for putting up with this little form letter. 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 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.

Thank you,

Jonathan Krall
Alexandria, VA 22301

Comment ID 043

First Name Jerry

Last Name King

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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.

Thank you,

Jerry King
Alexandria, VA 22301

Comment ID 044

First Name Lisa

Last Name Fues

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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.

Thank you,

Lisa Fues
Alexandria, VA 22301

Comment ID 045

First Name David

Last Name Kaplan

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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 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 under Alternative B.

Thank you,

David Kaplan
Alexandria, VA 22314

Comment ID 046

First Name Jeremiah

Last Name Christopher

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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.

Thank you,

Jeremiah Christopher
Alexandria, VA 22314

Comment ID 047

First Name Justin

Last Name Marks

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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, bikeable, 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.

Thank you,

Justin Marks
Alexandria, VA 22301

Comment ID 048

First Name Carol

Last Name Kalinoski

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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.

Thank you,

Carol Kalinoski
Alexandria, VA 22302

Comment ID 049

First Name Scott

Last Name Bartos

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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.

Thank you,

Scott Bartos
Arlington, VA 22202

Comment ID 050

First Name Jeff

Last Name Cohen

Organization

Collection Method
Email

Commenter Type
Individual

Comment
Hello

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?

Jeff Cohen
Arlington, VA 22206

Comment ID 051

First Name William

Last Name Rogers

Organization

Collection Method
Email

Commenter Type
Individual

Comment
I live in an AE flood zone and wanted to know how the new metro a long 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 live on Commonwealth Ave close to the King Street metro and I live in an AE flood zone. 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.

Thank you, Bill Rogers

Comment ID 052

First Name Cheryl Audet

Last Name Lavoie

Organization

Collection Method
Email

Commenter Type
Individual

Comment
Ladies and Gentlemen,
I have seen all the alternatives for providing Metro Rail in my area and am delighted for this potential availability. 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.

Thanks for your time,

Cheryl Audet Lavoie
Alexandria, VA 22314

Comment ID 053

First Name Laura

Last Name Plaza

Organization

Collection Method
Email

Commenter Type
Individual

Comment
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. Shame on City Council for once again elevating short term economic gain over all other values in decision making for our community.

Laura Plaze
Alexandria 22314

Comment ID 054

First Name Reubon

Last Name Juster

Organization

Collection Method
Email

Commenter Type
Individual

Comment
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?

Reuben Juster
Alexandria, VA 22305

Comment ID 057

First Name Patrick

Last Name Durbin

Organization

Collection Method
Email

Commenter Type
Individual

Comment
To Whom It May Concern:

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.

Thank you,

Patrick Durbin
Alexandria, VA

Comment ID 058

First Name Justin

Last Name Marks

Organization

Collection Method
Email

Commenter Type
Individual

Comment
Good afternoon:

I am writing to request that the Potomac Yard Metro Station design include bike access and covered secure bike parking.

I currently ride to the Braddock Road Metro. This experience has shown me that proper planning for parking and access to the station is vital.

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.

Thank you,

Justin Marks

Comment ID 059

First Name Philip

Last Name Hocker

Organization

Collection Method
Email

Commenter Type
Individual

Comment
Dear Ms. Farmer,

Thank you for your e-mail of 26 March giving four days' advance notice of a meeting regarding the "Potomac Yard Metro Rail Station," to be held on Tuesday, March 31st. That is very short notice and I will not be able to attend. Please include this e-mail in the comments record regarding the "Potomac Yard Metro Rail Station" project.

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.

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 Yards property owners will slow down Metro Rail transit for everyone else. Efforts by the City to usurp National 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.

Although your e-notice (see below) says that only comments submitted "between April 3 and May 18 will be responded to in the Final EIS," I believe the National Environmental Policy Act and Regulations require you to consider this submission in your deliberations toward the FEIS, and I request you do so.

Thank you for your consideration of these views.

Phil
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
Philip M. Hocker
Architect
Alexandria, Virginia 22301
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

Comment ID 060

First Name Alli

Last Name Baird

Organization Virginia Department of Conservation and Recreation

Collection Method
Email

Commenter Type
State Government

Comment

RE: Potomac Yard Metro Station EIS

Dear Mr. Farmer:
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 defines as habitat of rare, threated, or endangered plant and animal species, unique or exemplary natural communities, and significant geological 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 no 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). This project is located within 2 miles of a documented occurrence of state listed animals. Therefore, DCR 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 (VA ST § § 29.1-563 - 570).

Should you have any questions or concerns, feel free to contact me at 804-692-0984.

Sincerely,
Alli Baird LA, ASLA
Coastal Zone Locality Liaison

cc: Amy Ewing, VDGIF

Comment ID 061; Excerpts of this comment are referenced in Chapter 5 separately under Comment ID 62

First Name Dave

Last Name Cavanaugh

Organization

Collection Method
Email

Commenter Type
Individual

Comment
See copy of comment starting on following page

The Potomac Yard property is underutilized and I support efforts to locate a metro rail station at Potomac Yard.

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. During a month we celebrate Earth Day, it is ironic that City and Federal officials take steps, in the middle of the DEIS process, to short circuit public involvement. This is an important project for the future of Alexandria. Incorporating the City's public involvement process within the Federally

mandated process would help build citizen support for major redevelopment projects.

To the Editor:

#The Potomac Yard property is underutilized and I support efforts to locate a metro rail station at Potomac Yard.

#However, the city staff's selection of a preferred site for the proposed Potomac Yard Metro Station is an attempt to tamp down further consideration of public comments on the Draft Environmental Impact Statement (DEIS). 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.

#As reported in the Washington Post, the National Park Service would release the easement on approximately 1.71 acres of city property where the station would be located. In exchange the city would transfer 13.56 acres of local parkland near the parkway to the United States. The city would agree to invest $12 million towards improvements to the Mount Vernon Trail and Daingerfield Island.
#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.

During a week we celebrate Earth Day, it is ironic city and federal officials are making announcements and side agreements to basically short-circuit public comments. This has been a controversial project and an important project for the future of Alexandria.
#**Dave Cavanaugh**
#Alexandria

Comment ID 063

First Name S. Robert

Last Name Kaufman

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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 current economic an 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, and 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.

Respectfully

S. Robert Kaufman
Alexandria, VA 22314

Comment ID 064

First Name Terrance / Ann

Last Name Staley II / Herlin

Organization

Collection Method
Email

Commenter Type
Individual

Comment
As residents of the Potomac Greens neighborhood, we would like to submit the following comment regarding the viewsheds for the GW Parkway.

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.

Sincerely,
Terrance Staley II and Ann Herlin
Alexandria, VA 22314

Comment ID 065

First Name Terrance / Ann

Last Name Staley II / Herlin

Organization

Collection Method
Email

Commenter Type
Individual

Comment
As residents of the Potomac Greens neighborhood, we would like to submit the following additional concern about the planning for the Potomac Yard Metro Station.

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).

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.

We hope that the government of the City of Alexandria will take these concerns seriously as they move forward with the Potomac Yards Metrorail Station.

Sincerely,
Terrance Staley II and Ann Herlin
Alexandria, VA 22314

Comment ID 066

First Name Terrance / Ann

Last Name Staley II / Herlin

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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.

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 very 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.

We hope that the government of the City of Alexandria will take these concerns seriously as they move forward with the Potomac Yards Metrorail Station.

Sincerely,
Terrance Staley II and Ann Herlin
Alexandria, VA 22314

Comment ID 067

First Name Benjamin

Last Name Aiken

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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.

Thank you for your consideration.

Benjamin Aiken
Alexandria, VA 22302

Comment ID 069

First Name Brad

Last Name Todd

Organization

Collection Method
Email

Commenter Type
Individual

Comment

I am a business owner in the Potomac Greens area. With my partners, we own property on Slaters Lane and operate a business there. I'm also a resident of Old Town Alexandria for the past 16 years. 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.

Sincerely,

Bradley Todd
Alexandria, VA 22314

Comment ID 071

First Name Brook & Scott

Last Name Eisele

Organization

Collection Method
Email

Commenter Type
Individual

Comment
See copy of comment starting on following page

5/13/2015

Subject: Support Metro Build Option with Traffic Calming on E. Glebe Rd

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 some funds to manage the increase in traffic that is expected on E. Glebe Rd, and which is predicted to be the single road most affected by the metro.

Sincerely,

Brooke and Scott Eisele
Alexandria, VA, 22305

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 2/2013*

Comment ID 072

First Name Van

Last Name Van Fleet

Organization

Collection Method
Email

Commenter Type
Individual

Comment

At every one of the city's briefings on the proposed Metro Station in Potomac Yard, the City Staff described the four alternatives that were under consideration (now reduced to two). 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.

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.

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.

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. During the City's presentation to the Federation of Civic Associations last week, a "No Build" option was never mentioned. In previous discussions on this subject, the "No Build" option has always been downplayed or never addressed. However, it was suggested as an option at the federation meeting by a citizen, for the record.

The Environmental Impact Statement (EIS) was released on 27 March 2015 to the public. The National Park Service, WMATA, the Federal Transit Administration, and the City of Alexandria are all involved in the EIS process. Regrettably, it looks as though the Park Service has caved into the demands of the developer. This means that (despite the fact that the City owns the Alternative B land) the National Park Service has a "Greens Scenic Area Easement" on that same land, which they could cede to the City for construction of the Metro stop.

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 demolishment 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. 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.
Townsend A. "Van" Van Fleet
Alexandria, VA 22314

Comment ID 073

First Name Jack

Last Name Summe

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment

I'm Jack Summe; I'm speaking on behalf of myself and my family. Good evening. I'm Jack Summe. I live at [Redacted], Alexandria, Virginia. My family and I have lived in this location since April of 2011 and we plan to live there for a long time to come.

We purchased our townhouse so that we would be close to my place of employment near the Pentagon, in an area that is quiet, family friendly and safe. I also want to state that I only represent myself and my family in presenting this statement; however, I would like to point out that I live directly across the small residential street in Potomac Greens from the park that would become the Metro station under Alternative A, essentially placing a high traffic metro center in what many would call my front yard.

That is why I'm here today. 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. 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. Further, it would bring the potential of dumping a large, non-resident population directly into an otherwise quiet, peaceful, and safe community.

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.

I want to thank the Panel for this opportunity to allow me to speak, and I ask for your support for Alternative B. Thank you.

Comment ID 074

First Name Brian

Last Name Jungwirth

Organization Government Relations and Public Affairs Director, Virginia Railway Express

Collection Method
WMATA Public Hearing Testimony

Commenter Type
State Government

Comment

Good evening. My name is Bryan Jungwirth, I'm the Government Relations and Public Affairs Director for the Virginia Railway Express and I'm speaking tonight to share the areas of concerns regarding the Potomac Yard Metrorail station alternatives considered in the Draft EIS, especially the Build Alternative B-CSX design option.

As you may know, 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.

MAYOR EUILLE: Time's up.

MR. JUNGWIRTH: Okay Thanks. I 'll provide the rest in a written statement.

Comment ID 075

First Name Dino

Last Name Drudi

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment

Thank you, Mayor Euille and Mr. Ashe. And thank you, Mr. Ashe, for that very succinct presentation of the entirety of the project and the EIS.

I have been a Metro rider for nearly all of the time that I have lived here. When I was student at Catholic U and the Brookland Station opened, I rode the Metro the first day and it has been my primary method of getting around since that time.

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.

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.

WMATA has a problem; it is over- allocated. It's trying to do too much with its resources and as a consequence,t i can't do things well. Ten or 15 years ago, WMATA walked on water; it was the best public transit system in the country. H ardly anyone would say that now.

Distractions like this will take resources and management attention away from fixing the safety problems. The cell reception, which are way late on throughout the system. The SmarTrip card, which is going away because it's not manufactured anymore. Metrorail, five to ten years ago, reached its capacity. It has a plan to add capacity, but that plan is unproved, it's speculative. No new Metro station should be built with Metro at and beyond its design capacity. Thank you.

Comment ID 076

First Name Aimee

Last Name Custis, Communications Manager

Organization Coalition for Smarter Growth

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Non-profit / Community Organization

Comment

Good evening, Mayor Euille.

Good evening, Metro riders and Alexandria residents. I'm Aimee Custis, the Communications Manager for the Coalition for Smarter Growth. The Coalition for Smarter Growth is the leading organization working locally in the Washington, D.C. metro area, dedicated to making the case for Smart Growth.

Our mission is to promote walkable, inclusive, and transit-oriented communities and the land use and transportation policies to make those communities flourish.The Coalition for Smarter Growth has closely tracked the planning process for the Potomac Yard Metro station and reviewed the NEPA documentation. The study has been extensive and rigorously analyzed all available alternatives.

The Coalition for Smarter Growth supports Alternative B as the best alternative from a smart growth transportation, economic development, and environmental perspective. 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.

Alternative B will 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 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.

Comment ID 077

First Name Mark

Last Name Goode

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment
Good evening. My name is Mark Goode, and I live at [Redacted] in Alexandria. I 'm speaking fomyself and r my wife.

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 finding

1) Alternative B proposes building a covered walkway and a drop-off/pickup point at the northern-most end of our currently lightlytraveled neighborhood.T his 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.

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 site 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.

Comment ID 078

First Name Poul

Last Name Hertel

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment

Mr. Mayor, my name is Poul Hertel. I 'm here speaking on my own behalf. 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.

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.

Second, the mitigation needed for cleaning up the wetlands: Potomac Yard was one of the most active railroad yards in the United States, with a 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.

Third, the discussion about the current unprojected conditions on the blue line: The current conditions on the blue lines are already deplorable, and there is no discussion on the effects of an additional station.

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.

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. I n Option B, it not within a quarter-mile radius, not even close. The lending 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.

MAYOR EUILLE: Thank.

MR. HERTEL: So Option B would actually cost $28 million a year to maintain.

Comment ID 079

First Name Robert

Last Name Whitfield

Organization Fairfax County Taxpayers Alliance

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Non-profit / Community Organization

Comment

Good evening. I'm Robert Whitfield, with the Fairfax County Taxpayers Alliance. A nd I've only started to look at the documentation in recent weeks. 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 and I will provide further comments when I have looked at what the city's materials are.

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. S o I would defer further comment until I have read the documents.

Comment ID 080

First Name Mark

Last Name Anderson

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment

Good evening, Mayor.

Good evening, Mr. Ashe. A s the process continues toward determining whether or not a new Metro station should be built between Braddock Metro and Ronald Reagan National Airport, I wanted to raise the following questions in the hopes that the answers will be known prior to the final decision being made in this project.

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.

Just last week, the Washington Post reported that the Washington area population increase is slowing down, according to census figures. Alexandrian and Arlington have seen more people move out rather than move in. Have the decision-makers taken this into account in their assessment?

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?

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.

Thank you.

Comment ID 081

First Name Katy

Last Name Cannady

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment
Good. I 'm Katy Cannady. I live in the Potomac West Mall Area Plan, which is very near to the Potomac Yard, so I followed this process ever since the railroad pulled out.

First, I want to say something about the gentleman who is concerned about losing his neighborhood park. 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 is the city who travels it enjoys it and we should not even consider impinging upon it.

For all intents and purposes, the only real options are A, B, and no-build. 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. 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?

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 matters most.

Comment ID 082

First Name David

Last Name Fromm

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment

I 'm representing myself and I live in the Del Ray neighborhood. We've been looking forward to getting a Metro for a long, long time and it's interesting to see it's finally getting near fruition, at least in terms of permissions to build it.

In looking at the different plans, in Site A has been in, you know, the Area Plan for forever. And if you didn't know it was coming, you didn't do your due diligence when you bought your property.

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.I f 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. Thank you.

Comment ID 083

First Name Steven

Last Name Teslik

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment
Yes. Steven Teslik, a resident of Potomac Green A gain, like my friend, Mark, I want to raise the following questions to you, in hopes that the answers will be known prior to the final decision being made on this project.

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.

This is my second question. 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?

My third question: The EIS made reference to the existing Potomac Yard Shopping Center as consideration for the proposed station. Isn't that Center going to disappear? I sn'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?

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?

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?

And on my personal view, it's either than 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.

Comment ID 084

First Name Jerry

Last Name Foley

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment

Good evening. I'm Jerry Foley. I reside in Old Town. Well, when I first heard about this plan, I asked will be there restrooms, you know, and I was glad to hear that. You know, at least we're doing something civilized. 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? So, well, I just would like to that to be considered.

Comment ID 085

First Name Dave

Last Name Cavanaugh

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment
Hello, I'm Dave Cavanaugh and I'm representing myself. I'm a citizen of Alexandria. The Potomac Yard property is underutilized and I support efforts to locate a Metrorail station at Potomac Yard.

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:

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.

The city staff selection of a preferred site prior to the deadline for comments is an attempt to derail public involvement and limit consideration of other alternatives. During a month we celebrate Earth Day, it is ironic that city and federal officials take steps in the middle of a DEIS to short-circuit public involvement. This is an important project for the future of Alexandria and it's something that we should move ahead on but in an appropriate way. Thank you.

Comment ID 086

First Name Philip

Last Name Hocker

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment

Thank you. My name is Phil Hocker. I 've lived in Potomac West since 1987 and I'm an architect. I'm not representing any organization. I have to say, Mr. Mayor, congratulations on running a smooth hearing. I think you must be sitting there -- you can't say this -- you probably can't even respond when I say this, but it must challenge you to realize that there are two people who would like to have your job instead of having you continue. Thank you.

I believe that Alternative -- and I thank you for starting the clock until now.t hink that's sort of more than fair

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, as been noted before, should've been fully aware that this was coming.

Will 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. 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 Connecter. 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.T here'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.T he 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.

If there are short-term zoning issues, frankly, those are issues of the City's creation. 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. 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.

Thank you very much for your consideration.

Comment ID 087

First Name David

Last Name Dunn

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment

Hi, Mr. Mayor Thank you for letting me speak. My name is David Dunn. I live in the neighborhoods. In fact, I kind of have a unique perspective, living in our area. For the last 20 years, I've lived in Potomac Crossing, Potomac Greens, and Old Town Greens.

I'd just like to say that I really, really know the neighborhood and it's been a really great location for me to live in the fact that I'm someone that requires a vehicle to go to work, and living, essentially, one, now two traffic lights from Washington, D.C. has really been a great thing I can enjoy all of the attributes of my city as well as commute to work in relatively easy fashion, going to Arlington.

As far as a Metro is concerned, I believe a no-build alternative would probably be the best alternative. 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.

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.

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. Thank you.

Comment ID 088

First Name Arianna

Last Name Sekulow

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment

Hi, Mr. Mayor and Mr. Ashe. My name is Arianna Sekulow; I am representing myself and my family. 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.

I live on the northern-most block of Carpenter Road, near the City Park located in Potomac Greens. Within that one block, bordered by Lyles Lane, down Carpenter Road and back around to Potomac Greens Drive, by my count, there are at least 25 children, 21 of whom are under five years old.

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. 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. I t 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.

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. H istorically, 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.

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?

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?

These are all important questions that need to be answered before the first pylon is driven into the ground. 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. Thank you.

Comment ID 089

First Name Walter

Last Name Clarke, Chair

Organization Alexandria Chamber of Commerce

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Non-profit / Community Organization

Comment
Good afternoon. Thank you very much for having me. I'm Walter Clark; I'm the 2015 Chair of the Alexandria Chamber of Commerce and I'm here representing the Chamber of Commerce this evening.

As a part of the Alexandria Chamber of Commerce 2015 legislative agenda, which is made up of some of the business leaders and citizens of Alexandria and business owners, the Chamber Board of Directors identified the Potomac Yard Metro as a primary focus item of the legislative term. And briefly, to review that, Alexandria primary opportunity to realize economic development necessary to balance and grow the tax-based lies within Potomac Yard.

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.

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.

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.

I thank you very much for your hard work. Thank you.

Comment ID 090

First Name John

Last Name Schrader

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment

Hi, I'm John Schrader. I live at [Redacted]. And if you look on the neighborhood map, you'll see we're right in that last row of the townhouses on the lead end, very much impacted by several of the build options. My wife and I chose to live in Alexandria, we reside at [Redacted]. After spending almost 30 years in the military, for the first time, we got to choose where we were going to live and we chose Alexandria. And in Alexandria, we chose the Potomac Greens neighborhood. 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 ou where and when things were going t to happen.

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?

Noting that the good of the many outweighs the needs of the few, Alternative B is the only option that we can support. Alternative A and D clearly do not meet our expectations of having chosen Alexandria as our home.

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. B eyond 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.

And finally, one of the issues everyone says my property values will go up. I have to tell you, I don't care because I plan to be here a very, very long time. Thank you for your time.

Comment ID 091

First Name Susan

Last Name Coad

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment

Thank you for allowing me to speak. My name is Susan Coad. I live at the Eclipse, which is in Alexandria. We're just north of Four Mile Run, and we are a high rise that is a condo, which has 465 units, approximately 1,000 residents. 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 are 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 not 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 here 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.

But if this Metro were moved closer to us, it would be better for us and it would make our residents happy.N ow, 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. But my understanding is the reason for that was that it was built for the EPA-- and I forget how you describe it -- but it was leads and all that stuff for the EPA, and the EPA decided not to be there, so there was a lawsuit going on for five years and that's why it wasn't rented. I don't know if that has something to do with your consideration, but anyway, 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.

Comment ID 092

First Name Scott

Last Name Eisele

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment
Okay. My name is Scott Esele. I live at [Redacted]. Sorry to be here late and keep everyone late. I wasn't on planning on speaking, but after hearing a lot of things, I just figured I'd voice my comments as well. I 've lived in the area for 10 years. Lived on East Glebe for six years, and I've been aware of the Metro station almost since I've moved to the area. I know it's been slow moving, but I felt it's been easy to get informed on the process and I periodically will check and see what's going on and I'm grateful for the websites. 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. 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. Otherwise, that was my comment. Thanks. And I think a build option is good.

Comment ID 093

First Name James

Last Name Melton

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment

I will do the paperwork later on, but I just want to make a brief statement. I'm Jim Melton at [Redacted]. I've lived there since 1975.

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. Thank you.

Comment ID 094

First Name Betty

Last Name King

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment
Hello. My name is Betty King and I have lived in Hume Springs Alexandria for 31 years now, and I'm speaking only for myself. 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 Alexandria and Len Haven, 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 little bridges or whatever. Thank you.

Comment ID 095

First Name Andrea

Last Name Fitch

Organization

Collection Method
WMATA Public Hearing Testimony

Commenter Type
Individual

Comment

Thank you for letting me speak. My name is Andrea Fitch and I reside in Del Ray. I actually bought my house in the early '90s. In fact, the late Nancy Dunning was my listing agent and in her being the listing agent, I had the unique opportunity to kind of get some sense of what was going to be envisioned for Potomac Yard, and that included the relocation of the train tracks and Metro stations and whatnot.

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.

I have family that actually hails from Europe, so I think one of the things that has kept me a continued resident -- I was born and raised here, actually -- but it has kept me here is because, like my mother, who is from Europe, it's this concept of the convenience of being able to get to places and not be so dependent upon vehicles and cars, which we know has a very negative impact on the environment, not only in the fact that we still are burdened and dependent upon oil, but we're not finding more progressive ways of getting out that conundrum, if you will.

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.

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. Thank you.

Comment ID 096

First Name Tim

Last Name Roseboom

Organization Virginia Department of Rail and Public Transportation

Collection Method
WMATA Public Hearing Testimony

Commenter Type
State Government

Comment
Good evening. My name is Tim Roseboom; I'm with the Department of Rail and Public Transportation. I had not signed up to speak. I didn't originally intend to speak, but I'd like to associate myself and our agency with the comments of VRE, Mr. Bryan Jungwirth. 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.Thank you.

Comment ID 097

First Name Anonymous

Last Name 26

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
As an environmental professional I think that Mr. Ashe could have done a better job of making the materials more interesting in his presentation.

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.

Option D should be eliminated due to extravagant cost.

Comment ID 098

First Name Camille

Last Name Galdes

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
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 commuting to DC as well, which is what most new residents demand. 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.

Comment ID 099

First Name Ben

Last Name Sylla

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
Support stations

Support Alt. B

Benefit to adjacent neighborhoods. Builds walkability of city. Supports long-term financial health of city.

Comment ID 100

First Name Anonymous

Last Name 24

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
I support option B!

Comment ID 104

First Name Susan

Last Name Coad

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
Move Metro closer to Arlington land

Get money from Arlington!

Comment ID 108

First Name Anonymous

Last Name 11

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
[Hearing time] started early!

B-CSX! Or D! Please

Why did you buy in Potomac Greens - we have known about metro for YEARS

Comment ID 109

First Name Ann Marie

Last Name Grills

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
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?

Comment ID 110

First Name David

Last Name Adams

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
Go "B"

Comment ID 113

First Name Michelle

Last Name Adams

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
Option B is the best choice.

Safety and environmental issues are important to address for the PG [Potomac Greens] neighborhood + surrounding area.

Comment ID 114

First Name Anonymous

Last Name 5

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
Great work! I'm very much in favor of Alt. B. Please build it ASAP so I can take it every day. Save me from I-66. I live in Lynnhaven, please also extend the Metroway dedicated lanes to Reed as soon as possible as is planned

Comment ID 117

First Name Richard

Last Name Mainzer

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
The review process has been thorough and well-balanced. My compliments.

Comment ID 118

First Name Anonymous

Last Name 7

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
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.

Comment ID 123

First Name Tim

Last Name Roseboom

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
I live in Arlington (Ballston) and support this project. 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.

Comment ID 124

First Name Anonymous

Last Name 23

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
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. With all the construction, how will it effect your homes settling?

Comment ID 126

First Name Jack

Last Name Summe

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
The city needs to control non-resident access to Potomac Greens so that the neighborhood during rush hour.

Comment ID 127

First Name Anonymous

Last Name 1

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
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…)

Comment ID 129

First Name Anonymous

Last Name 14

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
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.

Comment ID 132

First Name John

Last Name Roy

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
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.

Comment ID 133

First Name Anonymous

Last Name 17

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
Alternative B would be the best option!

Comment ID 134

First Name Poul

Last Name Hertel

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
Will be providing more thorough commentary via email.

Comment ID 135

First Name Al

Last Name Attiliis

Organization

Collection Method
WMATA Comment Form

Commenter Type
Individual

Comment
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.

Option "B" will be a "hang out" after businesses close.

Comment ID 136; Excerpts of this comment are referenced in Chapter 5 separately under Comment IDs 218 to 224

First Name Poul / Connie

Last Name Hertel / Graham

Organization

Collection Method
Email

Commenter Type
Individual

Comment
See copy of comment starting on following page

Comments on Draft EIS

Poul Hertel and Connie Graham
3716 Carriage House Court
Alexandria, Va. 22309

Degradation of the George Washington Memorial Parkway

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 finest federal parks in the Unites 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?

It also sets a dangerous precedence for diminishing the support and protection of federal parks.

This seems like a great deal of pain for so little gain.

Concerns about City of Alexandria arguments

The George Washington Memorial Parkway is one of finest federal parks in the Unites 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 put in easements to achieve it. Every guest who has visited us has remarked on the beauty of this entranceway into Alexandria.

Option B, is clearly visible from the Parkway and will largely extinguish the special entrance, especially with the 500 ft. very high bridge that runs practically parallel to the Parkway. The Park service 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 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 argument for option B that because of its enhanced proximity it will create density is tautological since the density is allowed only if they get option b. From the target store, the difference between stations A and B is only 500ft.

If we measure to the middle of the station, 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.

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 $14Million 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.

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 less than the distance to the Alexandria Courthouse from City Hall….no

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 though 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”._

Faulty Logic

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.

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 $14milion 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 $14Million 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.

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. 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.

The discipline of Behavioral Finance has a lot to say about conformation bias, which is the human tendency to put greater weight on evidence that supports desired outcomes, and Alexandria is no different, having created a hypothetical construct based on selective data.

The EIS Does Not Include:

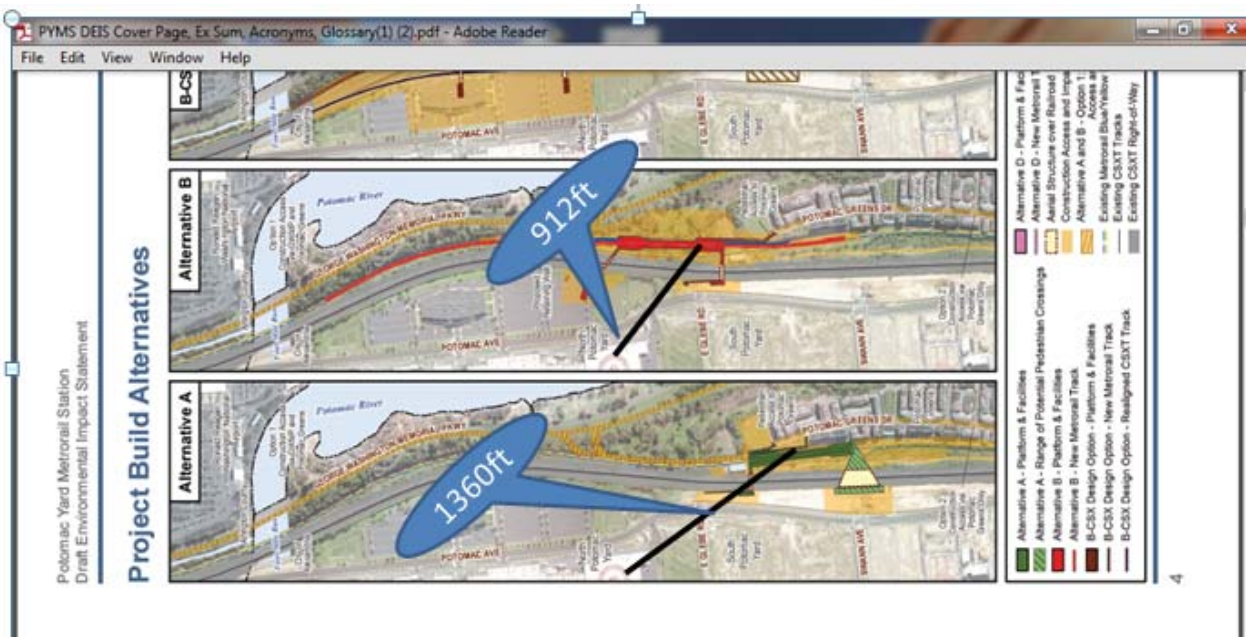
- *An agreement between the City of Alexandria and Park Services regarding compensation for a using scenic easement and federal parkland to build to option B.*

  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.

- *The mitigation needed for cleaning up the wetlands.*

  Potomac Yard was at one time the most active railroad yard 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.

- *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.


PYMS DEIS Cover Page, Ex Sum, Acronyms, Glossary(1) (2).pdf - Adobe Reader
File Edit View Window Help
Potomac Yard Metrorail Station
Draft Environmental Impact Statement
Project Build Alternatives
Alternative A
Alternative B
B-CS
1360ft
912ft
Potomac River
POTOMAC AVE
POTOMAC GREENS DR
SHARON AVE
Alternative A - Platform & Facilities
Alternative A - Range of Potential Pedestrian Crossings
Alternative B - Platform & Facilities
Alternative B - New Metrorail Track
B-CSX Design Option - Platform & Facilities
B-CSX Design Option - New Metrorail Track
B-CSX Design Option - Realigned CSXT Track
Alternative D - Platform & Fac
Alternative D - New Metrorail T
Aerial Structure over Railroad
Construction Access and Impa
Alternative A and B - Option 1
Access a
Existing Metrorail Blue/Yellow
Existing CSXT Tracks
Existing CSXT Right-of-Way
4

Comment ID 137

First Name Denise L.

Last Name Tennant

Organization City of Alexandria Beautification Commission

Collection Method
Alexandria City Government

Commenter Type
Local Government

Comment

Dear Mayor Euille and Members of Council,

I am writing on behalf of the City's Beautification Commission to inform you of the Commission's views and concerns regarding the proposed Potomac Yard Metrorail Station. 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.

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.

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.

As you may be aware, the Commission recognized Potomac Yard Park in its 2014 annual awards for the park's contribution to the beautification of the City. The park is a tremendous asset to the area and has proven to be very popular with local families. 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 exist 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.

Lastly, the Commission is concerned about the increase in impermeable surfaces in the Potomac Yard area with the additional 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.

While we recognize that there are many factors that will contribute to the final Metrorail Station build option selection and design, we submit that the goal of beautifying our City remains important and should no be overlooked. We believe that the proposed Metrorail Station will play an important role in the future of Alexandria and hope that it will contribute to the future beautification of Alexandria as well.

Respectfully,
Denise L. Tennant
Chair, Beautification Commission

Comment ID 138

First Name Leon

Last Name Vignes

Organization Arlington County Department of Community Planning, Housing and Development Planning Division

Collection Method
Email

Commenter Type
Local Government

Comment
See copy of comment starting on following page

ARLINGTON
VIRGINIA

DEPARTMENT OF COMMUNITY PLANNING, HOUSING AND DEVELOPMENT
PLANNING DIVISION

2100 Clarendon Boulevard, Suite 700, Arlington, VA 22201
TEL 703-228-3525 FAX 703-228-3543 www.arlingtonva.us

May 18, 2015

Sandra Marks,
City of Alexandria
Department of Transportation and Environmental Services
P.O. Box 178
Alexandria, VA 22313
Comments@potomacyardmetro.com

Dear Ms. Marks;

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.

Thank you again for the opportunity to comment. If you have any follow up questions, feel free to contact me at 703-228-3525.

Sincerely yours,

Leon Vignes,
Arlington County CPHD
CC: Gabriela Acurio, CMO
Bob Duffy, Planning Director
Claude Williamson, CPHD
Anthony Fusarelli, CPHD

Comment ID 139

First Name Betsy

Last Name Biffl

Organization

Collection Method
Email

Commenter Type
Individual

Comment
Hello,

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.

I live in Old Town and sold my car 5 years ago. Friends in DC have asked, "You can live in Alexandria without a car?" I can because I bike, walk and use public transportation. Other people can, too, and they will - if facilities are provided for non-motorized transportation. There is lots of room for improvement in Alexandria on this front. 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.

Thank you for your consideration and for all of the hard work that is going into this project.

Betsy Biffl
Alexandria, VA

Comment ID 140

First Name Randy

Last Name Cole

Organization

Collection Method
Email

Commenter Type
Individual

Comment
Dear WMATA,

I urge you to think big and bold when in 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, a the King St metro - just like the 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.

Be bold, and innovative - Bike Station !

Respectfully,

Randy Cole
Alexandria VA

Comment ID 141

First Name Anonymous

Last Name 18

Organization

Collection Method
Alexandria Comment Form

Commenter Type
Individual

Comment
Strongly support Build Alternative B

Comment ID 142

First Name Mary

Last Name Mertz

Organization

Collection Method
Alexandria Comment Form

Commenter Type
Individual

Comment
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.

Comment ID 143

First Name Anonymous

Last Name 19

Organization

Collection Method
Alexandria Comment Form

Commenter Type
Individual

Comment
Proponent for the Metro and highly encourage consideration / section of Alternative B - in addition - mitigate the existing noise impacts.

Alternative A would impact quality of life for PG residents with noise/vibration and mammoth structure!

Comment ID 144

First Name Anonymous

Last Name 21

Organization

Collection Method
Alexandria Comment Form

Commenter Type
Individual

Comment
Reference - Construction Access - 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).

Alternate B - Is the best option

Comment ID 145

First Name Anonymous

Last Name 4

Organization

Collection Method
Alexandria Comment Form

Commenter Type
Individual

Comment
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. Please ensure there is though put into bicycle access to the station under whatever alternative gets selected. I'm very excited about building this missing link in our transit system.

Comment ID 146

First Name Anonymous

Last Name 22

Organization

Collection Method
Alexandria Comment Form

Commenter Type
Individual

Comment
I really appreciate the City having this Open House and having so many people available to answer questions. 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). For these reasons, I prefer the No Build option.

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.

Comment ID 147

First Name Peter

Last Name Prahar

Organization

Collection Method
Alexandria Comment Form

Commenter Type
Individual

Comment
I prefer B-CSX:
- Build it right, build it once
- Most passengers / revenue
- Close to businesses
- Not ruinously expensive (D)

Comment ID 148

First Name Anonymous

Last Name 20

Organization

Collection Method
Alexandria Comment Form

Commenter Type
Individual

Comment
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"

Comment ID 149

First Name Sally Ann

Last Name Greer

Organization

Collection Method
Alexandria Comment Form

Commenter Type
Individual

Comment
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"

Comment ID 150

First Name Richard

Last Name Sampson

Organization

Collection Method
Alexandria Comment Form

Commenter Type
Individual

Comment
I support the A Alternative. Investment must be included for the continued improvement of the CCPY Transitway with higher frequency, signal priority/pre-emption, and ultimately conversion to streetcar operation.

Comment ID 151

First Name Dino

Last Name Drudi

Organization

Collection Method
Alexandria Comment Form

Commenter Type
Individual

Comment

1)
WMATA reports Metrorail reached and exceeded it's 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 my minimizing the loss of GW parkway lands / wetlands. Otherwise "No Build" is the second choice.

3)
Proposed designs are obtrusive and ugly. More traditional designs like the original aboveground stations would harmonize better with proximity to GW Parkway.

4)
Pedestrian tunnels instead of bridges would be preferable for access.

Comment ID 152

First Name Vince

Last Name Griffin

Organization

Collection Method
Email

Commenter Type
Individual

Comment
To Whom It May Concern:

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.

Comment ID 153

First Name John C.

Last Name Cook

Organization Virginia Railway Express (VRE)

Collection Method
Email

Commenter Type
State Government

Comment
See copy of comment starting on following page

VIRGINIA RAILWAY EXPRESS

May 15, 2015

Ms. Terry Garcia Crews
Regional Administrator
Federal Transit Administration
1760 Market Street
Suite 500
Philadelphia, PA 19103-4124

Mr. Mark Jinks
Acting City Manager
City of Alexandria
301 King St.
Alexandria, VA 22314

Dear Ms. Garcia Crews and Mr. Jinks:

Please accept the following comments from the Virginia Railway Express (VRE) regarding the Potomac Yard Metrorail Station Draft Environmental Impact Statement (DEIS). VRE is a commuter rail service operating 32 trains a day within the CSXT right-of-way between Fredericksburg, VA and Washington, D.C. that carry about 19,000 riders each weekday. VRE provides a safe, reliable and efficient alternative to driving for long-distance commuters and provides the equivalent capacity of a lane of traffic on the I-95/395 and I-66 travel corridors in the morning and evening commuting periods. 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% 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 deceased 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.

Thank you for the opportunity to share VRE concerns regarding this project.

Sincerely,

John C. Cook
VRE Operations Board Chairman

JCC:cmh

c: Members of the Alexandria City Council
Members of the VRE Operations Board
Ms. Melissa Barlow, Federal Transit Administration
Ms. Lee Farmer, City of Alexandria
Mr. Bryan Rhode, CSXT
Ms. Kelley Coyner, NVTC
Mr. Eric Marx, PRTC

Comment ID 154; Excerpts of this comment are referenced in Chapter 5 separately under Comment ID 225 to 230

First Name Jacob J.

Last Name Hoogland

Organization

Collection Method
Email

Commenter Type
Individual

Comment
See copy of comment starting on following page

Potomac Yard
Metrorail Station EIS
P.O. Box 16531
Alexandria, VA 22302

Office of the Secretary
WMATA
600 Fifth Street, NW
Washington, DC 20001

Sent: Via E-mail

Subject: Review of Potomac Yard Metro EIS

To Whom It May Concern:

Thank you for the opportunity to review the Potomac Yard Metro Draft EIS. These comments are based on my interest in the project as a resident of Alexandria, Virginia; a user of the WMATA metro system; and a user of the George Washington Memorial Parkway, a unit of the National Park System.

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.

PURPOSE AND NEED – ALTERNATIVE DEVELOPMENT

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.

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.

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 Cutural 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."

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 are 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.

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.

IMPACT ANALYSIS

Visual Impacts

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.[1]

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 realisticly assess the impacts to the visual resources.

Traffic Impacts

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 constrains 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.

Cultural Resources

The cumulative impacts to the cultural resources and adjacent National Register properties need to be better described. While the

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[1] 40 CFR 1502.8.

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.

MITIGATION MEASURES

Importantly, the document does not integrate mitigation measures that were the subject of a recent letter by the NPS to the City of Alexandria.[2] 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.[3] 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.

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[2] http://www.alexandriava.gov/uploadedFiles/2015-04-24%20Staff%20Report_w%20appendices.pdf (accessed May 16, 2015).

[3] http://alexandria.granicus.com/ViewPublisher.php?view_id=29&coa_clip_id=2911&coa_view_id=29 (accessed May 16, 2015).

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.[4]

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.[5]

USE OF THE DEIS BY OTHER AGENCIES FOR DECISIONMAKING

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

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[4] http://energy.gov/sites/prod/files/NEPACEQ_Mitigation_and_Monitoring_Guidance_14Jan2011.pdf (accessed May 16, 2015).

[5] 40 CFR 1502.9 (c) Agencies: (1) shall prepare supplements to either draft or final environmental impact statements if: (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.

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.

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.

CONCLUSION

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.

Sincerely,

Jacob J. Hoogland
Alexandria, VA 22314

Comment ID 155

First Name Jim

Last Name Durham

Organization Alexandria Bicycle and Pedestrian Advisory Committee (BPAC)

Collection Method
Email

Commenter Type
Non-profit / Community Organization

Comment
See copy of comment starting on following page

May 14, 2015

Comments on the Potomac Yard Metro Station Draft Environmental Impact Statement

I am a resident of Alexandria, VA and am also writing as Chair of the Alexandria Bicycle and Pedestrian Advisory Committee (BPAC).

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 <u>include "Bike accessibility" in the Potomac Yard Metro Station design effort</u>, and include features such as <u>safe pathways</u> (deconflicted from pedestrian pathways), <u>covered and secure bike parking</u> (including a Bike and Ride facility), and <u>Bikeshare</u>.

Thanks,
Jim Durham
Chair, Alexandria Bicycle and Pedestrian Advisory Committee
Alexandria, VA 22304

Comment ID 156

First Name Andrea

Last Name Burke

Organization Virginia Department of Historic Resources

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Comment
See copy of comment starting on following page

COMMONWEALTH of VIRGINIA

Department of Historic Resources

Molly Joseph Ward
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

May 18, 2015

Potomac Yard Metrorail Station EIS
Attn: Lee Farmer
P.O. Box 16531
Alexandria, VA 22302

Re: New Construction of WMATA Potomac Yard Metrorail Station – Draft Environmental Impact Statement
City of Alexandria and Arlington County, Virginia
DHR File No. 2012-0717

Dear Mr. Farmer,

On April 3, 2015, the Virginia Department of Historic Resources (DHR) received the Draft Environmental Impact Statement (DEIS) regarding the above-referenced project for our review and comment. We understand that the project will be receiving federal funding through the Federal Transit Administration (FTA), therefore our comments are provided pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended.

DHR understands that the City of Alexandria, in coordination with FTA, is examining four (4) alternatives for a new Metrorail Station at Potomac Yards in the City of Alexandria and extending into Arlington County.

- Alternative A
- Alternative B
- Alternative B-CSX Design
- Alternative D

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.

We look forward to continuing consultation on this important project. Should you have any additional questions, please contact me at (804) 482-6084, or via email at andrea.burke@dhr.virginia.gov.

Sincerely,

Andrea Burke

Andrea Burke
Architectural Historian, Review and Compliance Division

Comment ID 157

First Name Kurt

Last Name Flynn

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Comment
See copy of comment starting on following page

May 16, 2015

Kurt Flynn
Much Concerned Citizen &
NEPA Practitioner, Retired

Dear Federal Transit Administration and National Park Service,

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 is 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.

Please email if you would like to discuss my comments.

Respectfully,

Kurt Flynn

POTOMAC YARD METRORAIL STATION
Draft Environmental Impact Statement
Comments and Questions

PROPOSED ACTION

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.

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.

3. Please provide a copy of the application submitted for FTA's proposed action.

4. If application for FTA action has not been submitted, please describe why FTA determined the DEIS was necessary.

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.

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.

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.

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.

9. Please describe the Corps' NEPA compliance process for the proposed approval of the 404 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.

11. Please describe the Washington Metropolitan Area Transit Authority (WMTA) and describe its role in the proposed project.

12. Please confirm no other Federal agency besides FTA, NPS, and the Corps action will be required to approve this project.

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.

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.

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.

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.

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.

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.

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).

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.

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.

23. Please describe why the DEIS did not include mitigation for the impacts to these areas and provide the required mitigation.

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.

25. Please provide all correspondence between NPS, FTA, and the City regarding the use of Alternative B as a reasonable alternative.

26. Please describe NPS's planned NEPA compliance for the proposed project, including whether NPS plans to adopt the FTA EIS.

27. Please provide notification of public hearings or updates regarding future NPS actions.

INDIRECT & CUMULATIVE IMPACTS

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.

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.

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.

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.

NO ACTION ALTERNATIVE

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.

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 <u>if</u> 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, <u>there could be impacts</u> from the other improvements assumed <u>under this alternative</u>. 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.

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.

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.

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 exiting 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.

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.

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.

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.

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.

Comment ID 159

First Name Tim and Anne-Marie

Last Name Fennell

Organization

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Individual

Comment
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.

Tim and Anne-Marie Fennell

Comment ID 160

First Name David

Last Name Dunn

Organization

Collection Method
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Commenter Type
Individual

Comment

As a loyal long-time Alexandria native, I would like to offer a few positive suggestions regarding the proposed building of a new Metro station at Potomac Yards.

While many in the adjacent potentially impacted communities prefer the no-build option, it appears the majority of respondents prefer option B. With this perspective 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.

• 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.

• 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.

• 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 form trains, announcements, and increased rail traffic. The wall should also have a nice brick or stone like look in keeping with the aesthetics of Old Town and the GW Parkway.

• 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.

Thank you for your time,

David Dunn
Alexandria, VA 22314

Comment ID 161

First Name Barbara

Last Name Okorn

Organization Environmental Protection Agency

Collection Method
Email

Commenter Type
Federal Government

Comment
See copy of comment starting on following page

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

May 18, 2015

Ms, Melissa Barlow
Environmental Protection Specialist
Federal Transit Administration
1990 K Street NW, Suite 510
Washington, DC 20006

Re: Draft Environmental Impact Statement, Potomac Yard Metrorail Station, Alexandria Virginia, April 2015, CEQ #20150090

Dear Ms. Barlow:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508), the United States Environmental Protection Agency (EPA) has reviewed the Potomac Yard Metrorail Station Draft Environmental Impact Statement (DEIS). The purpose and need for the proposed 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 business.

The DEIS evaluates a no build alternative, three Metrorail Station Location alternatives, and a design option for one of the build alternatives (B-CSX Design Option). Permanent impacts to wetlands range from 0 acres to 1.22 acres and temporary impacts range from 0 to 3.61 acres. Other impacts include land acquisition, noise, vibration, floodplain, crossing of Four Mile Run and increased impervious surface. At this time no preferred alternative has been identified.

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. 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.

Sincerely,

Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

Enclosure

Enclosure
Detailed Technical Comments for Draft Environmental Impact Statement, Potomac Yard Metrorail Station, Alexandria Virginia

Alternatives

- 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.
- The EIS should indicate the duration of construction. Depending upon the timeframe, some impacts that are presented as temporary may be permanent.
- 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.

Noise and Vibration

- 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.
- We suggest a vibration monitoring and mitigation plan be developed and shared with the public.
- 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.
- 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.
- 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.
- Consider the condition of surrounding buildings, structures, infrastructure and utilities, where appropriate; and whether any special protection is needed for historic properties.
- 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.
- 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.
- 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.

Stormwater, Aquatic Resources, and Vegetation

- 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.
- 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.
- The document should address how the project's alternatives conform to the Chesapeake Bay Executive Order 13508.
- The document should include an analysis of how the alternatives will potentially impact water quality.
- 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.
- Buffers should be maintained around aquatic habitats.
- Page 3-170 states that BMPs would be installed to mitigate or improve water retention, etc. Please state the BMPs that are anticipated.
- 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.
- The design should incorporate Low-Impact Development (LID) designs to further reduce potential impacts to the design corridor.
- The design of the alternatives should incorporate stormwater management treatment features that are placed in uplands and not in WOUS.
- Table 3-47 should include the wetland type and the total size of the wetlands.
- Table 3-51 presents "WOUS and Wetland Total". This heading is confusing since wetlands can be WOUS.
- Page 3-182 should refer the reader to the location of the wetland report.
- 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.
- 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.
- Additional efforts should be made to avoid and minimize aquatic impacts.
- 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.

- Additional information should be provided regarding a mitigation plan that will fully replace the functions and values of the wetlands proposed to be impacted.
- 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.

Environmental Justice

- 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.

- 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.
- Figure 3-10 should be revised using 50% or some other more protective benchmark to identify areas of potential EJ concern.
- 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.

Children's Environmental Health
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 faclitly.

Cumulative Impacts
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.

Other resources and general comments

- Clearly state the anticipated construction time periods for each build alternative.
- While the DEIS does includes 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.

- Page 3-154 Mitigation measures for Greenhouse Gas Emissions should be discussed.
- 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.
- 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.
- 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.
- The DEIS should comply with Executive Order 13112 regarding invasive species.
- 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.

Comment ID 166; Excerpts of this comment are referenced in Chapter 5 separately under Comment ID 180 to 202 and 204 to 2014

First Name Bettina

Last Name Sullivan, Program Manager Environmental Impact Review and Long-Range Priorities

Organization Virginia Department of Environmental Quality (DEQ) with consolidated comments by:
- Department of Historic Resources
- DEQ, Office of Air Quality
- DEQ, Northern Virginia Office
- Department of Conservation and Recreation, Division of Natural Heritage
- Department of Forestry
- Department of Health, Office of Drinking Water
- Department of Rail and Public Transportation
- Department of Transportation, Northern Virginia District

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May 15, 2015

Ms. Terry Garcia Crews
Regional Administrator, Region III
U.S. Department of Transportation, Federal Transit Administration
1760 Market Street
Suite 500
Philadelphia, Pennsylvania 19103

Dear Ms. Crews:

RE: Potomac Yards Metrorail Station, Draft Environmental Impact Statement
DEQ 15-055F

Dear Ms. Crews:

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

PROJECT DESCRIPTION

According to the Draft EIS, the Federal Transit Administration (FTA), in cooperation with the City of Alexandria, the Washington Metropolitan Area Transit Authority, and other agencies, proposes to build a new Metrorail station in Alexandria between the Reagan/National Airport and Braddock Road Metro stations on the Blue and Yellow lines. The Draft EIS discusses the "no-build" alternative (completion of currently planned projects until 2040, except the proposed station) and four "Build" alternatives, described briefly as follows.

- The "no-build" alternative contemplates completion of the Potomac Yard street network and multi-use trails; future pedestrian/bicycle bridge between Potomac Yard and the Potomac Greens neighborhood; and expansion of local bus services. (Draft EIS, page 3 (file page 7), Executive Summary.)

- Alternative A is located along the existing Metrorail tracks between the CSX Railroad tracks and the north end of Potomac Greens. (Draft EIS, page 3 (file page 7), Executive Summary.)

- Alternative B is located between the George Washington Memorial Parkway and the CSX railroad tracks north of Potomac Greens and east of the existing Potomac Yard Shopping Center. Parts of this alternative would be located within the Greens Scenic Area, administered by the National Park Service within the City's Potomac Greens Park. (Draft EIS, page 5 (file page 9), Executive Summary.)

- Alternative B/CSX Design Option is located east of the existing Potomac Yard movie theatre on land currently occupied by the CSX railroad tracks. The tracks would have to be moved to the west so that the station and realigned Metrorail track can avoid the George Washington Memorial Parkway property and the Green Scenic Area easement. (Draft EIS, page 5 (file page 9), Executive Summary.)

- Alternative D is located west of the CSX railroad tracks near the existing Potomac Yard shopping center. This alternative would require elevated tracks starting north of Four mile Run, crossing over the CSX tracks again to re-connect to the existing Metrorail line behind Potomac Greens. (Draft EIS, page 5 (file page 9); see also page 4 (file page 8) for comparative illustrations.)

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.

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 (DHR) conducts reviews of projects to determine their effect on historic structures or cultural resources under its jurisdiction. DHR, as the designated State's Historic Preservation Office, ensures that federal actions comply with Section 106 of the National Historic Preservation Act of 1966 (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 (DHR) has consulted with FTA regarding this project. DHR 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.

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.

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 (NO_x) and volatile organic compounds (VOCs).

3(c) Comments. All precautions are necessary to restrict emissions of NO_x 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. 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.)

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.

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.

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 DCR-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 DCR, DCR 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. DCR 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. DCR 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. 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.

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).

8(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).

8(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.

8(c) Conclusion. According to VDH-ODW, there are no apparent impacts to public drinking water sources from the proposed project.

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

9. Rail and Transit Considerations. The Draft EIS discusses impacts and mitigation on transportation, including rail and transit, in sections 3.2 through 3.2.4 (pages 3-11 through 3-19).

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.

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. 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.

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 (NVTA) 2040 TransAction plan. The environmental work was funded in NVTA's 2014 program, and the project has been submitted for project development funding and development of a design-build package in response to NVTA's 2015-16 call for the project.

9(g) Alternatives Analysis.

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.

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 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).

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), 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.

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.

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.

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.

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.

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/FederalConsistency

Reviews.aspx#cert) provide content requirements for the FCD. See "Regulatory and Coordination Needs," item 11, below.

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 (DHR) 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).

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.

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).

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).

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 25-840-30 *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.

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. Solid and Hazardous Waste Management.

4(a) Coordination.

4(a)(i) Petroleum Contamination Information. As indicated above ("Environmental Impacts and Mitigation," item4(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 Persyzk, telephone (703) 583-3856 or e-mail Kathryn.persyzk@deq.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).

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
  - (9 VAC 20-81-620 **applies to asbestos-containing materials**)
- *Virginia Hazardous Waste Management Regulations*, 9 VAC 20-60
  - (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.*

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.

6. 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).

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.

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, or Angela Weller, e-mail 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.

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).

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.

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).

9(b) Agency Jurisdiction. Authorities for the activities of VDOT include, but are not limited to, Virginia Code Title 33.1.

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 Meghann Quinn, telephone (804) 698-4021 or e-mail Meghann.quinn@deq.virginia.gov).

10(b) Authorities. DEQ's responsibilities for pollution prevention stem from the Governor's Executive Order Number Nineteen (2010).

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).

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).

Thank you for the opportunity to review this Draft EIS. If you have questions, please feel free to contact me (telephone (804) 698-4102 or e-mail Bettina.sullivan@deq.virginia.gov) or Charles Ellis of this Office (telephone (8040 698-4195 or e-mail Charles.ellis@deq.virginia.gov).

Sincerely,

Bettina Sullivan, Program Manager
Environmental Impact Review and
Long-Range Priorities

Enclosures

cc: Melissa Barlow, FTA, D.C. Metro Office
Daniel Koenig, FTA, D.C. Metro Office

Ms. Lee Farmer, AICP, City of Alexandria
Jack Requa, WMATA
Roberta D. Rhur, DCR
G. Stephen Coe, DEQ-DLPR
Kotur S. Narasimhan, DEQ-DAPC
Christopher Egghart, DEQ-OWSP
Daniel Burstein, DEQ-NRO
Andrea Kampinen, DHR
Gregory Evans, DOF
Norman Whitaker, VDOT N.Va.
Valerie Pardo, VDOT N.Va.
Elizabeth Jordan, VDOT
Amy Inman, DRPT
Meghann Quinn, DEQ-OPP
Amy M. Ewing, DGIF
Keith R. Tignor, VDACS
Holly Sepety, DEQ-OSM
Daniel Moore, DEQ-OLGP
Tony Watkinson, MRC
G. Mark Gibb, NVRC

From: Kampinen, Andrea (DHR)
Sent: Friday, April 10, 2015 2:35 PM
To: Ellis, Charles (DEQ)
Subject: FTA PROJECT 15-055F

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.

From: Fulcher, Valerie (DEQ)
Sent: Friday, April 03, 2015 3:44 PM
To: dgif-ESS Projects (DGIF); Tignor, Keith (VDACS); Rhur, Robbie (DCR); odwreview (VDH); Coe, Stephen (DEQ); Narasimhan, Kotur (DEQ); Egghart, Christopher (DEQ); Gavan, Larry (DEQ); Moore, Daniel (DEQ); Sepety, Holly (DEQ); Nicholson, Shantelle (DEQ); Burstein, Daniel (DEQ); Kirchen, Roger (DHR); Kline, Everette (DOF); Evans, Gregory (DOF); Watkinson, Tony (MRC); Ray, Alfred C. (VDOT); Cromwell, James R. (VDOT); Jordan, Elizabeth (VDOT)
Cc: Ellis, Charles (DEQ)
Subject: NEW PROJECT FTA 15-055F

Good afternoon - attached is a new EIR review request/ project:

FTA: Potomac Yards Metrorail Station, City of Alexandria, DEQ #15-055F

The document is available at www.deq.virginia.gov/fileshare/oeir under "Federal Transit Administration."

A hard copy has been mailed to the city of Alexandria.

The due date for comments is MAY 4, 2015. You can send your comments either directly to Charlie by email (Charles.Ellis@deq.virginia.gov), or you can send your comments by regular interagency/U.S. mail to the Department of Environmental Quality, Office of Environmental Impact Review, 629 E. Main St., 6th Floor, Richmond, VA 23219.

If you have any questions, please email Charlie.

Thanks!

Valerie

Valerie A. Fulcher, CAP-OM, Executive Secretary Sr.

Department of Environmental Quality

Environmental Enhancement - Office of Environmental Impact Review

629 E. Main St., 6th Floor
Richmond, VA 23219
804/698-4330
804/698-4319 (Fax)
email: Valerie.Fulcher@deq.virginia.gov
http://www.deq.virginia.gov/Programs/EnvironmentalImpactReview.aspx

From: Gavan, Larry (DEQ)
Sent: Monday, May 04, 2015 1:27 PM
To: Ellis, Charles (DEQ)
Subject: RE: Comments on DEQ 15-055F, USDOT: FTA Draft EIS on Potomac Yard Metro Station

(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.]

From: Ellis, Charles (DEQ)
Sent: Monday, May 04, 2015 12:43 PM
To: Cason, Gladys (DGIF); Tignor, Keith (VDACS); Rhur, Robbie (DCR); odwreview (VDH); Egghart, Christopher (DEQ); Gavan, Larry (DEQ); Moore, Daniel (DEQ); 'Nicholson, Shantelle (DEQ)'; Evans, Gregory (DOF); Watkinson, Tony (MRC); Ray, Alfred C. (VDOT); Jordan, Elizabeth (VDOT); gmq@novaregion.org; Page, Kevin (DRPT)
Cc: Ewing, Amy (DGIF); Fulcher, Valerie (DEQ)
Subject: Comments on DEQ 15-055F, USDOT: FTA Draft EIS on Potomac Yard Metro Station

Everybody – I need your comments, if any, on the on-line Draft EIS by the Federal Transit Administration (and the City of Alexandria) concerning a proposed new Metro station at the Potomac Yard location in Alexandria. The document is available on Alexandria's web site at http://alexandriava.gov/potomacyard/default.aspx?id=56902.

Thanks very much.

Charlie Ellis
DEQ, Office of Environmental Impact Review

Charles H. Ellis III, Environmental Review Coordinator
Department of Environmental Quality
629 East Main Street
Richmond, Virginia 23219
(804) 698-4195
charles.ellis@deq.virginia.gov
www.deq.virginia.gov

DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

TO: Charles H. Ellis III **DEQ - OEIA PROJECT NUMBER: 15 – 055F**

PROJECT TYPE: ☐ STATE EA / EIR **X FEDERAL EA / EIS** ☐ SCC

☐ CONSISTENCY DETERMINATION

PROJECT TITLE: POTOMAC YARD METRORAIL STATION

PROJECT SPONSOR: USDOT / FEDERAL TRANSIT ADMINISTRATION

PROJECT LOCATION: **X OZONE NONATTAINMENT AND EMISSION CONTROL AREA FOR NOX & VOC**

REGULATORY REQUIREMENTSMAY BE APPLICABLE TO: **X CONSTRUCTION**
☐ OPERATION

STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:

1. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E – STAGE I
2. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 F – STAGE II Vapor Recovery
3. ☐ 9 VAC 5-45-780 et seq. – Asphalt Paving operations
4. **X 9 VAC 5-130 et seq. – Open Burning**
5. **X 9 VAC 5-50-60 et seq. Fugitive Dust Emissions**
6. ☐ 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to_____
7. ☐ 9 VAC 5-50-160 et seq. – Standards of Performance for Toxic Pollutants
8. ☐ 9 VAC 5-50-400 Subpart_____, Standards of Performance for New Stationary Sources, designates standards of performance for the_____
9. ☐ 9 VAC 5-80-1100 et seq. of the regulations – Permits for Stationary Sources
10. ☐ 9 VAC 5-80-1700 et seq. Of the regulations – Major or Modified Sources located in PSD areas. This rule may be applicable to the _____
11. ☐ 9 VAC 5-80-2000 et seq. of the regulations – New and modified sources located in non-attainment areas
12. ☐ 9 VAC 5-80-800 et seq. Of the regulations – Operating Permits and exemptions. This rule may be applicable to _____

COMMENTS SPECIFIC TO THE PROJECT:

All precautions are necessary to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NO_X).

K. S. Narasimhan

(Kotur S. Narasimhan)
Office of Air Data Analysis **DATE: April 6, 2015**

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

MEMORANDUM

TO: Charles Ellis, Environmental Program Planner

FROM: Steve Coe, DLPR Review Coordinator

DATE: April 27, 2015

COPIES: Sanjay Thirunagari, DLPR Review Manager
EIR File

SUBJECT: EIR Project 15-055F Potomac Yards Metrorail Station Alexandria– Review Comments

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 project scope as presented in the submittal:

> The project: construction of a new Metrorail station located at Potomac Yard within the City of Alexandria, along the existing Metrorail Blue and Yellow Line. The station would be located between the Ronald Reagan Washington National Airport and the Braddock Road Metrorail Stations.

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 Persyzk, 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.

From: Burstein, Daniel (DEQ)
Sent: Wednesday, April 29, 2015 12:58 PM
To: Ellis, Charles (DEQ)
Subject: FTA: Potomac Yards Metrorail Station, City of Alexandria, DEQ #15-055F - Review

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 VAC 5-130-100.

Virginia Water Protection Permit (VWPP) 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.

Daniel Burstein
Regional Enforcement Specialist, Senior II
Virginia Department of Environmental Quality
Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193
Phone: (703) 583-3904
Fax: (703) 583-3821
daniel.burstein@deq.virginia.gov

Molly Joseph Ward
Secretary of Natural Resources

Clyde E. Cristman
Director

Joe Elton
Deputy Director of Operations

Rochelle Altholz
Deputy Director of Administration
and Finance

COMMONWEALTH of VIRGINIA

DEPARTMENT OF CONSERVATION AND RECREATION

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

MEMORANDUM

DATE: May 4, 2015

TO: Charlie Ellis, DEQ

FROM: Roberta Rhur, Environmental Impact Review Coordinator

SUBJECT: DEQ 15-055F, Potomac Yard Metro Station

Division of Natural Heritage

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

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 DCR's jurisdiction in the project vicinity.

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

New and updated information is continually added to Biotics. Please 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 Angela.Weller@dgif.virginia.gov.). This project is located within 2 miles of documented occurrences of state listed animals. Therefore, DCR 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 (VA ST §§ 29.1-563 – 570).

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

From: Evans, Gregory (DOF)
Sent: Tuesday, May 05, 2015 4:02 PM
To: Ellis, Charles (DEQ)
Subject: RE: Comments on DEQ 15-055F, USDOT: FTA Draft EIS on Potomac Yard Metro Station

Charlie,

I have completed a desk review of the draft EIS for the above subject project on behalf of the Department of Forestry. 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.

This concludes the Department of Forestry's comments.

Greg

Greg Evans
Mitigation Program Manager/
Chesapeake Bay Program Lead
Virginia Department of Forestry
900 Natural Resources Drive, Suite 800
Charlottesville, VA 22903
434.906.3658
gregory.evans@dof.virginia.gov
www.dof.virginia.gov

From: Ellis, Charles (DEQ)
Sent: Tuesday, May 05, 2015 8:34 AM
To: Evans, Gregory (DOF)
Subject: RE: Comments on DEQ 15-055F, USDOT: FTA Draft EIS on Potomac Yard Metro Station

Greg – Right! Me too. Okay with me.

Charlie

Charles H. Ellis III, Environmental Review Coordinator
Department of Environmental Quality
629 East Main Street
Richmond, Virginia 23219
(804) 698-4195
charles.ellis@deq.virginia.gov
www.deq.virginia.gov

From: Evans, Gregory (DOF)
Sent: Monday, May 04, 2015 4:27 PM
To: Ellis, Charles (DEQ)

Subject: RE: Comments on DEQ 15-055F, USDOT: FTA Draft EIS on Potomac Yard Metro Station

Charlie,

I'll get you something tomorrow. Juggling a few too many balls right now.

Greg

Greg Evans
Mitigation Program Manager/
Chesapeake Bay Program Lead
Virginia Department of Forestry
900 Natural Resources Drive, Suite 800
Charlottesville, VA 22903
434.906.3658
gregory.evans@dof.virginia.gov
www.dof.virginia.gov

From: Ellis, Charles (DEQ)
Sent: Monday, May 04, 2015 12:43 PM
To: Cason, Gladys (DGIF); Tignor, Keith (VDACS); Rhur, Robbie (DCR); odwreview (VDH); Egghart, Christopher (DEQ); Gavan, Larry (DEQ); Moore, Daniel (DEQ); 'Nicholson, Shantelle (DEQ)'; Evans, Gregory (DOF); Watkinson, Tony (MRC); Ray, Alfred C. (VDOT); Jordan, Elizabeth (VDOT); gmg@novaregion.org; Page, Kevin (DRPT)
Cc: Ewing, Amy (DGIF); Fulcher, Valerie (DEQ)
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Everybody – I need your comments, if any, on the on-line Draft EIS by the Federal Transit Administration (and the City of Alexandria) concerning a proposed new Metro station at the Potomac Yard location in Alexandria. The document is available on Alexandria's web site at http://alexandriava.gov/potomacyard/default.aspx?id=56902.

Thanks very much.

Charlie Ellis
DEQ, Office of Environmental Impact Review

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charles.ellis@deq.virginia.gov
www.deq.virginia.gov

From: Samuels, Harry (VDH)
Sent: Tuesday, May 05, 2015 1:51 PM
To: Ellis, Charles (DEQ)
Cc: Soto, Roy (VDH)
Subject: RE: Comments on DEQ 15-055F, USDOT: FTA Draft EIS on Potomac Yard Metro Station

Mr. Ellis,

Project Name: Potomac Yard Metro Station
Project #: 15-055 F
UPC #: N/A
Location: Alexandria VA

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.

Comments From VDH Office of Environmental Health Services:
I'm a day late, but OEHS has no comments on the proposed project.
Thanks for the opportunity to comment.

Harry Samuels
Program Support /GIS Technician
Virginia Department of Health - Office of Drinking Water
804.864.7201 (M)

From: Ellis, Charles (DEQ)
Sent: Monday, May 04, 2015 12:43 PM
To: Cason, Gladys (DGIF); Tignor, Keith (VDACS); Rhur, Robbie (DCR); odwreview (VDH); Egghart, Christopher (DEQ); Gavan, Larry (DEQ); Moore, Daniel (DEQ); 'Nicholson, Shantelle (DEQ)'; Evans, Gregory (DOF); Watkinson, Tony (MRC); Ray, Alfred C. (VDOT); Jordan, Elizabeth (VDOT); gmg@novaregion.org; Page, Kevin (DRPT)

Cc: Ewing, Amy (DGIF); Fulcher, Valerie (DEQ)
Subject: Comments on DEQ 15-055F, USDOT: FTA Draft EIS on Potomac Yard Metro Station

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Thanks very much.

Charlie Ellis
DEQ, Office of Environmental Impact Review

Charles H. Ellis III, Environmental Review Coordinator
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www.deq.virginia.gov

Virginia Department of Rail and Public Transportation

MEMORANDUM

TO: Charles Ellis III, Department of Environmental Quality

FROM: Amy Inman, Planning & Mobility Programs Administrator

DATE: May 4, 2015

SUBJECT: Potomac Yard Metrorail DEIS Comments

This memo summarizes comments from the Department of Rail and Public Transportation (DPRT) regarding the Draft Environmental Impact Statement (DEIS) for the proposed Potomac Yard Metrorail station in Alexandria, VA. 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 B-CSX in developing the conceptual plans for this alternative.

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 FY15, DRPT provided $9.0 million in operating assistance and $13.0 million in capital assistance to VRE.

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 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 have 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.

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 economy 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 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 (VTIB) 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.

DRPT also agrees with the statement in the DEIS that the project is also financially feasible. In addition to the DRPT SYIP, it is also included in the Metropolitan Washington Council of Government's 2040 Constrained Long Range Plan (CLRP) and the Northern Virginia Transportation Authority's (NVTA) 2040 TransAction plan. The environmental work was funded in NVTA's 2014 program and the project has been submitted for project development funding and development of a design-build package in response to NVTA's 2015-16 call for project.

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.

DRPT is strongly opposed to Alternative B-CSX and Alternative D, believes neither are financially feasible and recommends setting both aside. Both alternatives 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 the FEIS and every attempt to mitigate adverse impacts should be included in the Record of Decision.

Regarding the Washington, DC to Richmond segment of the Southeast High Speed Rail project that DRPT is managing (www.DC2RVARail.com), our proposed alignment alternatives would work with any of the four Potomac Yard alternatives identified within the DEIS. Potomac Yard Alternatives A, B and D shows no change to the CSX track alignment, but our proposed alignment alternatives shows some slight straightening to improve speed.

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 our proposed alignment alternatives. Because of the long tangent shown on the Potomac Yard DEIS 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. Since the area will have a direct connection from the King Street Metrorail station which is 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.

The project engineering team from HDR reviewed the alternatives and noted 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 accounts for a "future" CSXT track (40' total – 15' from centerline of track to future and 25' to pier/crash wall)

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 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. 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. Lastly DRPT notes 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 Multimodal Alternatives Analysis between the Alexandria limit and Woodbridge that concluded in October 2014 with a recommendation for a three phased BRT, with the first phase between Huntington and Hybla Valley completed by 2025.

From: Whitaker, Norman (VDOT)
Sent: Monday, May 04, 2015 5:06 PM
To: Jordan, Elizabeth (VDOT)
Cc: Ellis, Charles (DEQ); Cromwell, James R. (VDOT); Ray, Alfred C. (VDOT); Pardo, Valerie (VDOT); Beacher, Andrew (VDOT); Moore, Robert L. (VDOT)
Subject: RE: Comments on DEQ 15-055F, USDOT: FTA Draft EIS on Potomac Yard Metro Station

Our comments:

Potomac Yard Metrorail Station / Draft EIS
May 4, 2015
Comments: Impacts to VDOT facilities

1- 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 condition.[1] Primary access would be via non-motorized and local bus modes. Moreover, no additional bus service or route modifications are planned,[2] so incremental impacts on US Route 1 would appear to be minimal.

2- 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.

Norman Whitaker, AICP
Transportation Planning Director
VDOT-Northern Virginia District
703-259-2799 (O)
703-638-8244 (C)

From: Jordan, Elizabeth (VDOT)
Sent: Monday, May 04, 2015 2:55 PM
To: Whitaker, Norman (VDOT)
Subject: FW: Comments on DEQ 15-055F, USDOT: FTA Draft EIS on Potomac Yard Metro Station

Hello,

This is just a reminder for any comments that you might have for the above referenced project.

Thanks,

Liz

Elizabeth G. Jordan, Ph.D.
Environmental Program Planner
Virginia Department of Transportation
804-371-0877
Elizabeth.Jordan@VDOT.Virginia.gov

From: Ellis, Charles (DEQ)
Sent: Monday, May 04, 2015 12:43 PM
To: Cason, Gladys (DGIF); Tignor, Keith (VDACS); Rhur, Robbie (DCR); odwreview (VDH); Egghart, Christopher (DEQ); Gavan, Larry (DEQ); Moore, Daniel (DEQ); 'Nicholson, Shantelle (DEQ)'; Evans, Gregory (DOF); Watkinson, Tony (MRC); Ray, Alfred C. (VDOT); Jordan, Elizabeth (VDOT); gmg@novaregion.org; Page, Kevin (DRPT)
Cc: Ewing, Amy (DGIF); Fulcher, Valerie (DEQ)
Subject: Comments on DEQ 15-055F, USDOT: FTA Draft EIS on Potomac Yard Metro Station

Everybody – I need your comments, if any, on the on-line Draft EIS by the Federal Transit Administration (and the City of Alexandria) concerning a proposed new Metro station at the Potomac Yard location in Alexandria. The document is available on Alexandria's web site at http://alexandriava.gov/potomacyard/default.aspx?id=56902.

Thanks very much.

Charlie Ellis
DEQ, Office of Environmental Impact Review

Charles H. Ellis III, Environmental Review Coordinator
Department of Environmental Quality
629 East Main Street
Richmond, Virginia 23219
(804) 698-4195
charles.ellis@deq.virginia.gov
www.deq.virginia.gov

[1] Page 3-17, Section 3.2.3.2
[2] Page 3-18

From: Egghart, Christopher (DEQ)
Sent: Thursday, May 07, 2015 2:19 PM
To: Ellis, Charles (DEQ)
Subject: Office of Wetland and Stream Protection Comments on Draft EIS Potomac Yard Metrorail Development

Charlie,

I must have missed the Virginia Beach deadline. I did not realize it has such a tight turnaround. Sorry! As for the Potomac Yard Metro stop, I'll go along with what the Northern Regional Office says as they will be issuing the permit(s). Best to let the VWP program speak with one voice.

I will be in contact with my supervisor Dave Davis with regard to the scoping responses and reviews. In the past I've taken them on when we were short on staff in other parts of the group. I am not sure he ever intended me to be the go to person for these. I'll let you know what his responses/intentions are.

Thanks,

Chris Egghart
Cultural Resources Specialist
Department of Environmental Quality
629 E Main Street Richmond VA 23219
christopher.egghart@deq.virginia.gov
804-698-4377

Comment ID 167

First Name Troy

Last Name Creasy

Organization CSXT

Collection Method
Email

Commenter Type
Business

Comment
See copy of comment starting on following page

Troy J. Creasy
Project Manager II – Public Projects
1610 Forest Avenue, Suite 120
Richmond, VA 23229
804-226-7718
Troy_Creasy@csx.com

RECEIVED
MAY 11 2015
T&ES
ADMINISTRATION DIVISION

April 30, 2015

Mr. Richard J. Baier
City of Alexandria
Dept of Transportation and Environmental Services
P.O. Box 178 – City Hall
Alexandria, VA 22313

Subject: Potomac Yard Metro Station DEIS B-CSX Design Option – CSXT Mileposts CFP 107 to 108

Dear Mr. Baier,

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 Build Alternative B-CSX Design 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 benefits.

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 a 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 option is ultimately chosen and will continue to work with all affected agencies on completing this important project.

Sincerely,

Troy Creasy
Project Manager II – Public Projects

Comment ID 168

First Name Jerry

Last Name King

Organization

Collection Method
Alexandria City Government

Commenter Type
Individual

Comment
See comment on the following page

Comments on the Potomac Yard Metro Station Draft Environmental Impact Statement that was presented at the Transportation Commission on May 11, 2015

As a member of the Transportation Commission and the Potomac Yard Metrorail Implementation Work Group I am looking forward to the city's approval of this project. This project has been a long time in the making since its inception forty years ago and most of us in the city are eager to have it move on to design and construction. I am pleased with the effort of city staff to bring this project toward final approval, along with their extensive efforts with public outreach.

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 accessibly 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 stations design should reflect the ease of accessibility for these modes of transportation.

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.

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.

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.
-

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.

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.

Jerry King
Alexandria, VA 22301

Comment ID 169

First Name Mary L.

Last Name Kendall, President

Organization Old Town Greens Townhouse Owners Association

Collection Method
Email

Commenter Type
Non-profit / Community Organization

Comment
On behalf of the Old Town Greens Townhouse Owners Association, I submit the following for the Record. A formal letter from counsel will follow:

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.

Mary L. Kendall
President, OTGTOA

Comment ID 170

First Name Lucy

Last Name Kempf, Director, Urban Design and Plan Review

Organization National Capital Planning Commission

Collection Method
Email

Commenter Type
Federal Government

Comment
See copy of comment starting on following page

National Capital Planning Commission 401 9th Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel: 202.482.7200 Fax: 202 482.7272 www.ncpc.gov

IN REPLY REFER TO:
NCPC File No. 7681

May 18, 2015

Potomac Avenue Metrorail Station EIS
P.O. Box 16531
Alexandria, VA 22302
comments@potomacyardmetro.com

Re: NCPC Comments on the Draft Environmental Impact Statement for the proposed Potomac Yard Metrorail Station

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the proposed Potomac Yard Metrorail Station (PYMS) in Alexandria, Virginia. The DEIS evaluates one no-build scenario and four alternative sites to construct a new Washington Metropolitan Area Transportation Authority (WMATA) Metrorail station on the Blue/Yellow line, between the Washington National Airport Station and the Braddock Road Station. The four alternative sites to construct a new Metrorail station are identified within the DEIS as Build Alternatives A, B, and C and as the B-CSX Design Option.

Overall, the National Capital Planning Commission has a long history in supporting the development and maintenance of a multi-modal regional transportation system that meets the mobility needs of workers, residents, and visitors and helps improve air quality and other environmental conditions. 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. 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.

NCPC staff's specific comments on sections of the DEIS are below:

3.4.3 Land Use and Zoning—Environmental Consequences

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.

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.

3.8.4 Visual Resources—Mitigation

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 Metrorail 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.

3.9.2 Cultural Resources—Affected Environment

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. NCPC 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.

Thank you again on the opportunity to comment on the DEIS for the proposed PYMS. NCPC staff note that, per the WMATA Compact, before a mass transit plan is adopted, altered, revised or amended, the WMATA Board shall transmit such proposed plan, alteration, revision or amendment for comment to NCPC (Va. Code Ann. §§ 56-529 and 56-530 and the "Compacts" companion volume at p. 410 (2010); also at 2009 Acts of Assembly of Virginia, Ch. 771). As such, we look forward to working with WMATA and the City of Alexandria during design development of a PYMS. NCPC staff further note that any improvements to the GWMP are to be submitted by NPS to NCPC for advisory review under 40 U.S.C. § 8722(b)(1).

Should you have any questions regarding NCPC staff's comments, please feel free to contact Jeff Hinkle at 202.482.7265 or jeff.hinkle@ncpc.gov.

Sincerely:

Lucy Kempf

Lucy Kempf
Director, Urban Design and Plan Review

Comment ID 171

First Name Timothy

Last Name Yuskavage

Organization

Collection Method
Email

Commenter Type
Individual

Comment
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.

Comment ID 172

First Name Molly

Last Name Williams Pugh

Organization

Collection Method
Email

Commenter Type
Individual

Comment
To whom it may concern,

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.

Thank you,
Alexandria, VA 22302

Comment ID 173

First Name Catherine

Last Name Voorhees

Organization

Collection Method
Email

Commenter Type
Individual

Comment
To Whom This May Concern:

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.

Thank you for your consideration.

Catherine M. Voorhees
Alexandria, VA 22308

Comment ID 174

First Name Rick

Last Name Keller, Chair

Organization Mount Vernon Group of the Sierra Club

Collection Method
Email

Commenter Type
Non-profit / Community Organization

Comment

The Mount Vernon Group of the Sierra Club appreciates this opportunity to comment on the Draft Environmental Impact Statement for the new Potomac Yard Metrorail Station. The Mount Vernon Group (MVG) is the largest local Sierra Club group in Virginia, with more than 3,700 members in the cities of Alexandria and Falls Church, Arlington County, and eastern parts of Fairfax and Prince William counties.

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's 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 daily trips 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.

We thank you for consideration of our views and look forward to working with the City of Alexandria and the other agencies involved as the Potomac Yard Metrorail Station moves through the NEPA process and on through implementation.

Rick Keller
Sierra Club, Virginia Chapter
Mt. Vernon Group, Chair

Comment ID 175

First Name Kathryn

Last Name Papp

Organization

Collection Method
Email

Commenter Type
Individual

Comment
These comments are based on the pdf document of April 15,2015 available on the City of Alexandria website on May 17, 2015.

General Comments:

While the document is thorough and well-constructed, major aspects of the development - such as the siting of areas of major density and type of usage - remain undetermined. This results in maps that are misleading, especially when acting as key references to other key determinants of the project, such as auxiliary roadways, long term environmental impact, potential ridership, flood assessment, etc.

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 Alt A (10,000) and Alt B (11,300).

2) high density commercial development is anticipated between E. Glebe and Swann (not settled yet) BUT both and serve this area absolutely equally well.

A critical omission is an absence of discussion of the role of Potomac Avenue as a north/south transit way. This vital artery makes and 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.

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.

Environmental Impact:

Sheer difference in density makes Alt A preferable from an environmental impact standpoint. Alt A=9.25 vs=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 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.
I would be happy to discuss any of these comments at any time.

Sincerely,
Kathryn S. Papp
Associate Senior Fellow
National Council for Science and the Environment

Comment ID 176

First Name David

Last Name Dunn

Organization

Collection Method
Email

Commenter Type
Individual

Comment
See copy of comment starting on following page

Alternative B

Requested changes to Pedestrian Access in the Potomac Greens, Old Town Greens, Potomac Crossing Neighborhoods.

The changes will serve all communities by providing easier access (to the waterfront or Old Town for example) for commuters and recreational users from Potomac Yards and beyond.

Planned existing (eastern) walkway PG to be removed. This adds needed space for parkway visual barrier. In addition, the existing neighborhood will benefit from the least adverse impacts possible at the same time having an equally viable option (below) that better serves all nearby communities.

Requested Pedestrian Bridge at midsection of Potomac Greens and Old Town Greens - serving all communities fairly.

New bike lanes have recently been added on Potomac Greens Drive from here south to Slaters Lane. Lanes terminate at the end of Old Towne Greens also making this a smart location for an access way in this location.

Comment ID 177

First Name Peter

Last Name Hubbard

Organization

Collection Method
Email

Commenter Type
Individual

Comment
Dear Sir/Madam:

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.

Thank you for your attention and consideration.

Regards,
Peter Hubbard & Alyson Rose-Wood
Alexandria, VA 22305

Comment ID 178

First Name Patrick and Jocilyn

Last Name Bergin

Organization

Collection Method
Email

Commenter Type
Individual

Comment

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 – Rte. 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 – Rat 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.

Sincerely,
Name: Patrick and Jocilyn Bergin
Alexandria, VA, 22305

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

Comment ID 179

First Name John

Last Name Ray

Organization

Collection Method
Email

Commenter Type
Individual

Comment

Dear Sirs:
I have extensive experience with alternatives analysis.

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 Metro rail 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.

This reminds me that the Arlington County Board very fortunately decided to not proceed with the proposed Arlington street car project which in my opinion would have been a real financial disaster including adding extensively to street congestion. Our local municipalities need to do better than the proposed Potomac Yard Metro rail station (with its very limited alternatives analysis) and the canceled Arlington street car project.

The City of Alexandria is to be commended for its implementation of the King Street Trolley which is an excellent example of real forward thinking.

Regards,

John Ray

Alexandria VA 22304

Comment ID 203

First Name Jill/ Nate

Last Name Ralph / Weisshaar

Organization

Collection Method
Email

Commenter Type
Individual

Comment

To whom it may concern,
We love the Del Ray community and are excited to see it develop and grow.

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 hums, 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.

Sincerely,
Nate Weishaar and Jill Ralph
Alexandria, VA 22305

Comment ID 231

First Name Jennifer

Last Name Hovice

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment

Good morning, Mr. Mayor and Council, City Staff. My name is Jennifer Hovice and I'm a homeowner at [Redacted], and I'm here this morning to voice my enthusiastic support for the Metro station at Potomac Yard, particularly Location B, the locally preferred alternative.

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.

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 an 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.

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.

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. And I also want to praise City staff for their excellent outreach on this effort

Comment ID 232

First Name Robert

Last Name Gireaux

Organization Potomac Yard Special Tax District Committee for Tax Fairness

Collection Method
Alexandria Public Hearing

Commenter Type
Non-profit / Community Organization

Comment

Thank you, Mr. Mayor, and all the Council members for your work on this and all the many things you're involved with here in City Hall. We citizens very much appreciate it and recognize your incredible dedication.

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.

Comment ID 233

First Name Austin

Last Name Cusack

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment

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. Let the record show we held discussions on April 29th with Councilman Wilson, April 30th with Councilman Smedberg, May 1st with Mayor Euille and City Manager Jinks (ph), May 7th with Councilman Lovain, May 12th with Vice Mayor Silverberg, and May 15th with Council Members Pepper and Chapman.

Council, Mr. Mayor, Ms. Vice Mayor and City Staff, thank you very much. Thank you for caring enough about us that on very short notice, you each took the time to meet and listen to our concerns despite the hectic schedules and pressures you were under with the City Budget. 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. Personally meeting with each of you has inspired me to get more involved with the City and my community.

My wife Martha and I moved to Alexandria because we love this area and we wanted our daughters to grow up in a good community that appreciates history, culture, nature, and diversity. Martha purchased our home in Potomac Yard well before it was built using a VA loan while I was in military service and away. If not for the VA loan, we wouldn't be living here. 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.

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.

I look forward to future correspondence with each of you concerning our community and share gratitude on behalf of the families of Potomac Yard for your service. Thank you.

Comment ID 234

First Name Rafael

Last Name Lima

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment
<crosstalk, jokes with mayor and council>

I am used to less favorable treatment often but Okay, let me start by really thanking you, Mr. Mayor and all the members of the City Council for your leadership during this process. I truly trust you can lead us in this moment and also that you can recognize when you face an unfair situation.

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 I 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. Thank you very much.

Comment ID 235

First Name Tonya

Last Name Colbert

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment

Thank you, Mayor. My name is Tonya Colbert and I am a resident of Potomac Yard as well as a citizen and voter in the City of Alexandria. I'm here to make a statement regarding your upcoming decision on the building of the Potomac Yard Metro Station.

Like many neighbors, I support the concept of building a Metro Station but have serious concerns regarding the financing model. First, I'd like to thank each one of you for taking the time out that you did to come and speak with us. It provided interesting insights into the history of this project and into your personal perspectives and objectives.

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.

Comment ID 236

First Name Vicky

Last Name Lessa

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment

Good morning. My name is Vicky Lessa. I am a new Potomac Yard resident and also a new resident to the City of Alexandria. 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. Thank you.

Comment ID 237

First Name Adrienne

Last Name Lopez

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment

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.

As our elected representatives, it is your duty to meaningfully listen and consult with us as affected parties, and we trust that you want to right the wrong that was done with your previous actions as a body and find a solution that will be fair for all. Thank you.

Comment ID 238

First Name Richard

Last Name LaFace

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment
My Mayor, Council Members, my name is Rich LaFace and with Patricia Harris, we lived in Potomac Yard about eight months. For the record, we are strongly in favor of the Potomac Yard Metro project and will not seek to delay it in any way. 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.

Thank you.

Comment ID 239

First Name Adam

Last Name Bramwell

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment

Mr. Mayor and City Council, thank you. 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 its 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. Thank you.

Comment ID 240

First Name Patricia

Last Name Harris

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment

Hello. I am Patricia Harris. I'm a Potomac Yard resident. 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 oaky 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 his 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. Thank you very much.

Comment ID 241

First Name Cindy

Last Name Zshu

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment

Hello. Thank you, Mr. Mayor and Council Members, for facilitating this opportunity to hear from the citizens of this great city. My name is Cindy Zshu [SHOO]. I'm a new resident of the City and I'm a proud new homeowner of the Potomac Yard development.

When I shared with my family in China the news of buying a house in a brand new community with a Metro Station planned in the near future, they were elated. All of them fully understood the importance of building infrastructure for a healthy and vibrant economy. They have all witnessed Shanghai's Metro which is now the longest in the world, of any city, being build in the last 25 years. 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. Thank you.

Comment ID 242

First Name Anthony

Last Name Estricko

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment

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.

So I just went to tell you about where I see Potomac Yard is going and where it's going for Alexandria as a whole. When my wife, Heather, and I moved into Potomac Yard and we decided to call Potomac Yard and Alexandria our home, it was a huge decision for us, largest investment we ever made. And that decision wasn't based on anything outside of the sense of community, charm, and the potential that we saw in Potomac Yard. It's a great place to be. Now that I've been here for six months, we made the right decision. This is where we want to be. It's grown so much before our eyes that it's made us ever more confident in our decision.

We've experienced a sense of community unlike any other place we've lived. Our neighbors bond together over issues like this and things that we find important as a community. We've seen a location thoughtfully developed with the best interests of this community in mind and not just the community of my neighbors but the community of Alexandria as a whole.

I'm a proud resident of Potomac Yard and I wholeheartedly support my community and my chosen City. I was thrilled when the Council I stand before today approved my appointment to the Potomac Yard Design Advisory Committee and for that I thank you. It means the world to me to be able to actively shape my community and make it a better place not just for myself and my direct neighbors but all those that visit and live in Alexandria and Potomac Yard.

I believe that Potomac Yard plays a critical part in the future of Alexandria in how it's perceived by other cities and nations, no longer just a historic city with rich history and culture but a true city of the future, a model of sustainability, and an economic hub. Since its inception, Potomac Yard has been about bettering the community. Pulte Homes, the developer whom we've all purchased our properties from, played a major role in infrastructure. Not only did the infrastructure benefit Potomac Yard but the entire City of Alexandria from the parks that now line Potomac Avenue to Potomac Avenue itself, which offers a welcome relief on the congestion of Jefferson Davis Highway where Pulte constructed the Monroe Avenue Bridge. The list goes on and on and on.

Potomac Yard, its residents, its developers, we're good for Alexandria. It's good for the neighboring communities. It's good for those that commute through our neighborhoods. It's good for you. It's good for your campaigns. It's good for all of us. And continued development and growth will only be better for us all.

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. Thank you.

Comment ID 243

First Name Jack

Last Name Sullivan

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment

Mr. Mayor, thank you very much. As some of you know, I was appointed by the Federation of Civic Associations to the Metro System Consultative Group on the Potomac Stop several years ago. And although that body terminated, I have continued to attend the meetings and follow the developments.

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. Thank you.

Comment ID 244

First Name Van

Last Name Van Fleet

Organization Old Town Civic Association

Collection Method
Alexandria Public Hearing

Commenter Type
Non-profit / Community Organization

Comment

Yes. Mr. Mayor, Members of the Council, I'm Van Van Fleet. I'm the President of the Old Town Civic Association speaking on behalf of the members of the Old Town Civic Association.

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 a no build option for the Potomac Yard Metro stop.

The Environmental Impact Statement was released on the 27th of March to the public. The National Park Service, WMATA, the Federal Transit Administration, and the City of Alexandria are all involved in the EIS process. Regrettably, 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 Greens 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 trucks and construction equipment 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 the numerous 20- to 70-year-old majestic trees? Unfortunately, alternative haul routes would adversely impact the residents of Potomac Greens and other surrounding neighborhoods.

For all these reasons, a 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 very much.

Comment ID 245

First Name Dino

Last Name Drudi

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment

Thank you, Mr. Mayor. 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 detriments 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.

Comment ID 246

First Name Katy

Last Name Cannady

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment

I'm Katy Cannady. I live in the Potomac West Small Area Plan very near the Yard. I've followed this for years. 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.

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.

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. 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. Thank you.

Comment ID 247

First Name David

Last Name Dixon

Organization Mount Vernon Group of the Sierra Club

Collection Method
Alexandria Public Hearing

Commenter Type
Non-profit / Community Organization

Comment

Mr. Mayor, Members of the City Council, my name is David Dixon. I'm your neighbor. I live in South Arlington but today I'm speaking on behalf of the Mount Vernon Group of the Sierra Club whom I serve as a Volunteer transportation and Smart Growth Chair.

Mount Vernon Group is the largest local Sierra Club group in Virginia with more than 3,700 members in the Cities of Alexandria and Falls Church, Arlington County, and parts of Fairfax and Prince William County.

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.

And we look forward to continuing to work with you and your staff as this project moves forward. Thank you very much.

Comment ID 248

First Name Steve

Last Name Malone

Organization City of Alexandria Environmental Policy Commission Workgroup

Collection Method
Alexandria Public Hearing

Commenter Type
Local Government

Comment

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.

Comment ID 249

First Name David

Last Name Fromm

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment

Mayor Euille, Members of Council, my name is David Fromm. I hadn't actually planned to speak to this item but I found that on figure one, you've got me living on 87 Randolph Street, not Randolph Avenue. It's -- (Laughter.)

Judy Lowe (ph) just insisted, so I was -- the other day I was up at the north end of Kind 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 1800's. 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.

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, it should have been, so ... [applause].

Comment ID 250

First Name Poul

Last Name Hertel

Organization

Collection Method
Alexandria Public Hearing

Commenter Type
Individual

Comment

Mr. Mayor, members of City Council, the Connie (ph) and I are influenced by no diminution of zeal for your future interests nor a deficiency of grateful respect for your past kindness, but we have the deepest concerns about the venture being proposed.

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.

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. 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.

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.

APPENDIX G

Reference Materials

Conflict of Interest Disclosure Statement

NPS Letter to City of Alexandria, April 20, 2015

CONFLICT-OF-INTEREST DISCLOSURE STATEMENT
40 C.F.R. 1506.5(c)

AECOM Technical Services, Inc., ("Consultant") has been retained by the Washington Metropolitan Area Transit Authority to prepare an environmental impact statement ("EIS") for the Potomac Yard Metrorail Station Project ("Project").

Consultant affirms that it does not have any financial or other interest in the outcome of this project, in accordance with Council on Environmental Quality Regulation, 40 C.F.R. § 1506.5(c) (1999). Consultant further affirms that it does not have any agreement, enforceable promise, or guarantee to provide any future work on this project. Consultant has no associations or professional or business relationships with anyone who has a financial interest in the outcome of this project, nor does anyone with a financial interest in the outcome of this project exercise any control over the Consultant's preparation of this EIS.

For: AECOM Technical Services, Inc.
[Consulting Firm Name]

By: Diana C Mendes
[Authorized Officer]

Date: January 26, 2011

United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY
REFER TO:

1.A1. (NCR-GWMP)

April 20, 2015

Mr. Mark Jinks
City Manager, City of Alexandria
301 King Street
Alexandria, Virginia 22314

Dear Mr. Jinks:

I am writing to follow up on the November 14, 2014 letter from the National Park Service (NPS) to City Manager, Rashad Young regarding the Environmental Impact Statement (EIS) for the proposed Potomac Yard Metro Station. In that letter, the NPS stated its belief that Build Alternatives A or B could be viable from its perspective, but that the 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 (GWMP) should Alternative B be selected.

The NPS understands that, with the release of the Draft EIS, your staff is likely to recommend Alternative B as the "locally preferred alternative" for approval by the Alexandria City Council at an upcoming meeting. Over the last several months the NPS and the City of Alexandria staff have had productive discussions regarding potential measures for mitigating impacts and the loss of parkland within the GWMP. 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 City's proposal would offset the loss of approximately 7,000 square feet of GWMP parkland by providing the United States with full fee ownership of most of a parcel of City parkland on which it currently holds a scenic easement, and by placing limitations on building heights adjacent to the GWMP, building lighting, and building signage, through easements and/or City regulations. In addition, the City proposes to allocate approximately $12 million to mitigate impacts to park resources through the following measures:

- Stormwater management planning and implementation of stormwater-related improvements to Daingerfield Island and the adjacent section of the GWMP;
- Development of and at least partial funding for the implementation of a Master Plan for improvements to Daingerfield Island;
- Repairs and improvements to the Mount Vernon Trail in the vicinity of the project area; and
- Plans and studies that will address the acute planning needs for the south section of the GWMP (Four Mile Run to Mount Vernon), covering such topics as vegetation and landscape, cultural resources and archeology, viewshed protection, visitor use, resource stewardship, and facility management.

The NPS believes that the full implementation of the package described above would sufficiently mitigate the loss of park and easement land and the impacts to park resources, and NPS accordingly does not

object to the identification of Alternative B as the locally preferred alternative in the EIS. NPS notes that significant work remains to complete this National Environmental Policy Act process, as well as compliance with the National Historic Preservation Act and Section 4(f), and that some aspects of the project are still under discussion. Those processes and issues will need to be completed and resolved before NPS would provide any needed final approval for Alternative B or whatever alternative is ultimately selected.

Thank you for your continued cooperation on this process and your work with the NPS to preserve parkland and resources. If you have any questions or need further information, please contact me or Peter May, Associate Regional Director for Lands, Planning and Design at (202) 619-7025.

Sincerely,

Robert A. Vogel
Regional Director

APPENDIX H

City of Alexandria Boards and Commissions

City of Alexandria Beautification Commission (137)

City of Alexandria Park and Recreation Commission (259)

City of Alexandria Environmental Policy Commission (257)

City of Alexandria Board of Architectural Review (254)

City of Alexandria Planning Commission (255)

City of Alexandria Transportation Commission (251)

City Council of the City of Alexandria (253)

City of Alexandria, Virginia

Alexandria Beautification Commission

P.O. Box 178

Alexandria, Virginia 22313

Honorable William D Euille, Mayor
and Members of City Council
City of Alexandria
City Hall Room 2300
301 King St.
Alexandria, VA 22314

May 14, 2015

Dear Mayor Euille and Members of Council,

I am writing on behalf of the City's Beautification Commission to inform you of the Commission's views and concerns regarding the proposed Potomac Yard Metrorail Station. 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 Potomac Yard Park, and minimize the increase in impermeable surfaces in the station design.

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 user experience.

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.

As you may be aware, the Commission recognized Potomac Yard Park in its 2014 annual awards for the park's contribution to the beautification of the City. The park is a tremendous asset to the area and has proven to be very popular with local families. 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 at 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.

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 new development, and we request that the final design of the Metrorail Station incorporate permeable surfaces to the greatest extent possible.

While we recognize that there are many factors that will contribute to the final Metrorail Station build option selection and design, we submit that the goal of beautifying our City remains important and should not be overlooked. We believe that the proposed Metrorail Station will play an important role in the future of Alexandria and hope that it will contribute to the future beautification of Alexandria as well.

Respectfully,

Denise L Tennant

Denise L. Tennant
Chair, Beautification Commission

DEPARTMENT OF RECREATION, PARKS AND CULTURAL ACTIVITIES
1108 Jefferson Street
Alexandria, Virginia 22314
Phone: (703) 746-4343
Fax: (703) 746-5585
James B. Spengler, Director

Park and Recreation Commission

May 15, 2015

Mayor William Euille
Vice Mayor Allison Silberberg
Councilman John Taylor Chapman
Councilman Timothy B. Lovain
Councilwoman Redella S. Pepper
Councilman Paul C. Smedberg
Councilman Justin M. Wilson

Re: Potomac Yard Metro Station

Dear Mayor Euille and City Council Members:

The Park and Recreation Commission supports the staff recommendation of Alternative B as the location for the Potomac Yard Metro Station because it is consistent with park plans and goals.

Throughout the process, the Commission has received reports from staff regarding the various options, including taking a walking tour of the various proposed sites. Alternative A would either destroy or significantly and negatively impact the newly constructed play spaces and water feature in Potomac Yard park and would mean that the largest section of that linear park would not be usable as parkland. Alternative B has a much smaller impact on the existing Potomac Yard Park, as it will land in a plaza area that was initially conceived as a landing point for a pedestrian bridge.

Although the Commission supports the staff recommendation, the Commission does so with the following four pieces of advice related to issues of concern to the Commission.

First, and presence of the Metro station at Potomac Yard will undoubtedly increase use of the Potomac Yard Park and the pedestrian and bicycle trail. The increased use will result in the need for significant additional maintenance including the need for additional trash pick-up, among other things. Council must plan now to make available the appropriate funding to ensure that the increased needs created by increased use related to Metro can be met.

Second, the Potomac Yard bicycle and pedestrian trail is a key element for the success of the Metro station, as residents and visitors will be able to safely walk and bike to and from the station. The Commission urges Council to ensure that the planning and design process includes areas for bicycle share stations and personal bicycle parking. There are many examples of innovative bicycle parking solutions around the world. The planning process should include consideration of creative solutions for bicycle parking. The Commission expects to see bicycle parking and bicycle share stations accounted for in the design phase.

Third, to the extent entrances to the station are in a park, those entrances must be designed as park features so that they are consistent with and seamless with the character and use of the surrounding park. Council should direct staff to ensure that the planning and design process includes the consideration of the station entrances as park elements.

Fourth, Council should direct staff to make every effort to ensure that both Potomac Greens Park and Potomac Yard Park remain safe and accessible throughout the construction phase. Council should ensure that appropriate maintenance of the parks continues throughout the construction phase to keep the parks safe and accessible. If areas of the parks must be made inaccessible for safety reasons, the time of inaccessibility should be as limited as possible and adequate communication regarding alternatives must be made to the public. To the extent that, for example, the Potomac Yard pedestrian and bicycle trail might become unusable at some point during construction, there must be a well-designated detour to ensure appropriate through travel for cyclists and pedestrians. Likewise, any interruption to the safe use of the play space in Potomac Greens Park must be limited and well communicated to the community.

The Commission supports the addition of Metro to Potomac Yard and urges Council to take steps to make clear that the planning, design, and construction process must include careful attention to ensure the existing Potomac Yard Park and Potomac Greens Park are enhanced by the presence of the Metro station.

Sincerely,

DocuSigned by:
Jennifer Atkins
D3421C109181409...

Jennifer Atkins, Co-Chair
Park and Recreation Commission

May 15, 2015

Honorable Mayor William D. Euille and Members of City Council
City of Alexandria
Suite 2300, City Hall
301 King St
Alexandria, VA 22314

Re: Potomac Yard Metrorail Station Preferred Alternative Endorsement

Dear Mayor Euille and Members of Council:

On behalf of the Alexandria Environmental Policy Commission (EPC), I am writing to urge your approval of the City staff's recommendation of "Alternative B" for the location of the future Potomac Yard Metrorail Station.

The EPC believes the proposed Station provides much needed increased access to public transportation along a rapidly growing corridor in the City of Alexandria. The new station supports the overall intent of Alexandria's Environmental Action Plan (EAP), and several key goals within it. With a focus on climate change and sustainability, the EAP calls for substantial reductions in emissions from daily vehicle miles traveled, and increased access to integrated transit.

The EAP sets a target, by 2020, of increasing the number of commuters who use public transportation by 25% over 2000 census data. It also specifically calls for a Potomac Yard Metrorail Station to be operational before the occupancy rate of the Potomac Yard development area reaches 70%. In addition to meeting specific goals of the EAP under transportation, the new station will also support objectives in air quality improvement, energy conservation, and climate change mitigation. Proposed Alternative B, as presented to EPC, supports the goals of the EAP outlined above by maximizing service to residents within the critical half-mile walking radius.

Alternative B will result in a net loss of wetlands. While EPC is reluctant to reduce any wetlands acreage, the mitigation framework drafted with the National Park Service (NPS) will result in higher quality wetlands and improved storm water management along a crucial riparian corridor in Alexandria. We understand there will also be opportunities for improvements to Daingerfield Island and the heavily used Mt Vernon trail. Additionally, we note that high density development at public transit sites has much less aggregate impact on wetlands and other natural resource areas than low density, single-occupancy vehicle oriented development in outer suburbs.

We look forward to working with Council and staff as the City develops designs for the new station, and begins making detailed planning decisions. To cite one important design component, we will advocate for the incorporation of bike share stations, bicycle parking facilities, and pedestrian and bicycle trail access to create a truly multi-modal transportation hub.

For the reasons stated above, we urge your endorsement of preferred Alternative B. Should you have any questions or be in need of our assistance, please do not hesitate to contact me at the email address below.

Sincerely,

Jim Kapsis
Chair, Environmental Policy Commission
kapsisje@gmail.com

BOARD OF ARCHITECTURAL REVIEW (OLD AND HISTORIC DISTRICT) ACTION, APRIL 29, 2015*:

Ms. Roberts made a motion to support Alternative B as the preferred station alternative, based on its consistency with the relevant Standards listed in Section 10-105 of the zoning ordinance, with the following conditions:

1. If Alternative B is selected, the BAR recommends that any potential impacts of the station design include, at a minimum, the following mitigation:
   a. Construction access shall not occur from the GWMP.
   b. The overall station design should use materials that are appropriate to the local Alexandria building traditions and the original GWMP infrastructure construction.
   c. Particular attention must be paid to the following elements to insure that they are harmonious with the old and historic aspect of the GWMP:
      i. Landscape berms and retaining wall materials that minimize the apparent height of the overall structure and blend with the natural landscape, using materials already found on the GWMP, such as stone;
      ii. The roof design and materials of the station;
      iii. The form and materials of the platform roof and the pedestrian bridges must be as visually light as possible;
      iv. Lighting must be minimal, directed away from the Parkway, and should complement the station design; and
      v. The height of the structures should be minimized to the maximum extent possible.
2. The BAR will be actively involved in the schematic design of the station, through the BAR Concept Review process, and at each appropriate step in the station design review process until a Certificate of Appropriateness is approved.

Ms. Roberts further moved that, although Alternative B is the only location within the Old and Historic Alexandria District, the BAR is concerned that the viewshed from the GWMP and that the memorial character of the GWMP be protected, including aspects of the cultural landscape such as historic grading, historic trees and historic wetlands, regardless of which station alternative is selected.

* The minutes from the April 29, 2015 Board of Architectural Review meeting are still in draft form. Formal approval will take place on May 20, 2015.

PLANNING COMMISSION ACTION, MAY 5, 2015: On a motion by Vice Chairman Dunn, seconded by Commissioner Wasowski, the Planning Commission voted to recommend Alternative B, with construction access Option 2, for the Potomac Yard Metro Station and determined that it is consistent with the City's Master Plan. The motion carried on a vote of 5 to 0 with Commissioner Lyle absent and Commissioner Macek recusing himself.

Reason: The Planning Commission agreed with the staff analysis that the provision of a Metrorail station, specifically in the location of Alternative B, is most consistent with and represented in the preceding planning processes and documents. Further commentary discussed that the impacts to the George Washington Memorial Parkway can be mitigated through collaboration already outlined through the draft net benefits agreement with the National Park Service, and that the Alternative B location minimizes impacts to the linear park [Potomac Yard Park] in Potomac Yard.

Alexandria Transportation Commission
301 King Street
Alexandria, VA 22314
Phone: 703.746.4025

Mayor William D. Euille and Members of City Council
City Hall
301 King Street
Alexandria, VA 22314

May 15, 2015

Re: Potomac Yard Metrorail Station – Preferred Alternative Endorsement

Dear Mayor Euille and Members of City Council:

At the Transportation Commission meeting held on May April 11, 2015, staff provided its recommendation for a Locally Preferred Alternative (LPA) for the Potomac Yard Metrorail station. On behalf of the Transportation Commission, I am writing to urge your approval of the City staff's recommendation of Alternative B for the location of the future Potomac Yard Metrorail Station.

We believe that Alternative B provides the best balance between land use and transportation, with the highest potential to serve future density and serve the largest number of potential riders. Alternative B provides the most economic benefit to the City, while providing an opportunity for smart growth and a walkable, compact, urban community, consistent with City plans.

We look forward to working with Council and staff as the City continues more detailed planning and design for the new Metrorail station. Some of the specific issues that should continue to be explored as part of the station development include emergency access, installation of Capital Bikeshare and secure bicycle parking on both sides of the track, accessibility, safe and well designed pedestrian and bicycle circulation and connectivity to adjacent neighborhoods.

Sincerely,

Jerry King
Vice Chair, Alexandria Transportation Commission

RESOLUTION NO. 2676

WHEREAS, in 2011 the City of Alexandria, as the project sponsor and joint lead agency, and the Federal Transit Administration (FTA), as lead Federal agency, in cooperation with the Washington Metropolitan Area Transit Authority (WMATA) and the National Park Service (NPS), initiated an Environmental Impact Statement (EIS) under National Environmental Policy Act (NEPA) to assess the potential environmental impacts associated with the proposed construction and operation of the Potomac Yard Metrorail Station; and

WHEREAS, the Draft EIS was released for public review and comment on March 27, 2015, a document which (1) explains the need for the station and considers four build alternatives (Alternative A, Alternative B, Alternative D, and B-CSX Design Option) for the station location; (2) evaluates the potential natural, visual, social, historical, cultural, and economic, and fiscal impacts for each alternative; and (3) evaluates a "no build" alternative that relies on existing transportation infrastructure in lieu of a new station; and

WHEREAS, selection of the preferred location of the Metrorail station (1) is a significant decision for the City from a transportation, land use and economic development perspective; (2) is one of the final steps in the Draft EIS process; and (3) enables preparation of a Final EIS which will include further design and refinement of the preferred alternative to minimize community and environmental impacts followed by the Records of Decision (RODs) issued by FTA and NPS and the award of the design-build contract, final design, and construction; and

WHEREAS, building a new Metrorail station is (1) the key to transforming Potomac Yard into a smart-growth, urban, walkable community with a mix of office, residential uses, high-quality retail, entertainment, and new parks; and (2) necessary to accommodating growing transportation demand in the Route 1 corridor within the existing roadway network and providing additional benefits to the City, as described in the Potomac Yard Metrorail Station Staff Recommendation for the Preferred Alternative (Attachment); and

WHEREAS, of all the alternatives considered in the Draft EIS, Alternative B best balances land use and transportation, is consistent with City plans, and places the station in the best location to serve the largest number of potential Metrorail riders; and

WHEREAS, during refinement of the preferred alternative through the Final EIS process and as design advances, subject to applicable land use laws and processes, the City will continue to pursue strategies to avoid, minimize, or mitigate adverse impacts to the community, natural, and cultural resources, including but not limited to the strategies outlined in the staff recommendation (Attachment); and

WHEREAS, Alternative B requires a land exchange and release of the Greens Scenic Area Easement from the National Park Service, the City will need to enter in to a Net Benefits Agreement with NPS to include the elements outlined in Table 2 and Appendix B of the staff recommendation; and

WHEREAS, the public has been engaged throughout the NEPA process through public meetings, meetings with community groups, briefings of boards and commissions, and meetings of the Potomac Yard Metrorail Implementation Work Group (PYMIG), all of which were open to the public; and

WHEREAS, many residents have expressed support for Alternative B based on its potential to positively affect the development of Potomac Yard, its citywide economic benefits, and its transportation benefits;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF ALEXANDRIA, VIRGINIA:

1. The Council selects Alternative B as the preferred alternative for the Potomac Yard Metrorail Station to best support the high-density mix of uses envisioned for North Potomac Yard, to support the adjacent communities, and to realize the transportation, economic development, and fiscal benefits;

2. The Council selects Option 2 for construction access via Potomac Greens (no access from the George Washington Memorial Parkway) for Alternative B;

3. The Council authorizes the City Manager to negotiate a Net Benefits Agreement with the National Park Service (NPS) based on the mitigation framework for impacts to the George Washington Memorial Parkway (GWMP) for Alternative B, subject to City Council approval;

4. The Council authorizes the Environmental Impact Statement (EIS) process to proceed to the Final EIS stage;

5. The Council authorizes an amendment to the City's agreement with the Washington Metropolitan Area Transit Authority (WMATA) to authorize and fund the design-build contractor selection process through contract award;

6. The Council authorizes the City Manager to enter into a Memorandum of Understanding with WMATA to outline roles and responsibilities throughout the design-build process, subject to City Council approval;

7. The Council directs the City Manager to bring concurrently with the agreement authorizing the funding for the design-build construction contract, a detailed series of costed-out alternatives for Council consideration, including a list of financial milestones, any potential changes to revenue sources, and a consideration of options to address the Tier II Tax District. (This list should include alternatives from the City Manager's memorandum dated May 20, 2015);

8. The Council directs the City Manager and staff to bring back a recommendation to City Council for either a reconstitution or new composition of the Potomac Yard Metrorail Implementation Group (PYMIG), for appropriate representation as the project moves forward; and

7. This resolution shall take effect immediately upon its adoption.

Adopted: May 20, 2015

WILLIAM D. EUILLE MAYOR

ATTEST:

Jacqueline M. Henderson, MMC City Clerk

APPENDIX I

Comments Received after May 18th Deadline

Walter C. Clarke, City of Alexandria Chamber of Commerce (252)

Kathryn Papp (215)

Gavin Lutz (259)

Troy Creasy, CSX (258)

Kurt Flynn (260)

Kurt Flynn (261)

Appendix I: Comments Received after May 18th Deadline

Walter C. Clarke, Alexandria Chamber of Commerce (252)

Dear Mayor Euille:

As part of the Alexandria Chamber of Commerce's 2015 Legislative Agenda, the Chamber Board of Directors identified the Potomac Yard Metro as the primary focus item for this legislative term. To briefly review, the Chamber stated the following about the Metro:

"Alexandria 's primary opportunity to realize economic development necessary to balance and grow our tax base lies within Potomac Yard Redevelopment of Potomac Yard will create a vibrant mixed use community of residences, hotels and office, retail and open space -- all with 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 Coordinated Development District plans contemplate and depend upon Metro service. Constructing a new Metro station at Potomac Yard, is critical to successful redevelopment."

The Alexandria Chamber of Commerce continues to be extremely committed to bringing metro to Potomac Yard and has been pleased with the progress the City has made to date. Given the Chamber's previous support, we formally endorse the City's professional staff recommended position of locating the new Potomac Yard Metro at Alternative B as soon as possible.

Robust commercial development of Potomac Yard is critical in order to responsibly meet the debt obligations the City will incur as a result of building the station. The City must maximize the potential for commercial development in this area in order to meet i ts projected revenue numbers. Recent reports have indicated that a staggering 86% of new commercial development in the Washington, DC region is occurring within Y4 mile of a Metro station. If Alexandria is to make itself competitive for significant future commercial real estate opportunities , building the Potomac Yard Metro and selecting Alternative B is the most logical course of action.

The Chamber would like to also applaud the City for identifying multiple funding sources in order to pay for the Potomac Yard Metro. We would like to endorse the current financing plan that has been proposed and would encourage you to continue to apply this financing strategy to future transportation projects around the City. We feel the common-sense financing strategy that has been developed for the Potomac Yard Metro should be the model for these types of revenue- generating infrastructure investments in the future.

In closing, we would like to congratulate the City for its efforts to date to bring the Potomac Yard Metro to reality. This Metro station, which is an historic investment for Alexandria, will play a vital role in keeping our city competitive for major commercial activity for years to come. We urge you to "build" the City staff recommended site of Alternative B as soon as possible and maintain the current financing strategy to pay for the station.

We would like to thank you for the opportunity to comment on the building of the Potomac Yard Metro and look forward to working with you, the Council and the City Administration on bringing this sought-after project to our city.

Sincerely,

William C. Clarke
2015 Board Chairman
Alexandria Chamber of Commerce

John T Long III
President and CEO
Alexandria Chamber of Commerce

Kathryn Papp (215)

Dear Peter:

I apologize for ducking on the Net Benefit Assessment issue. Here is my thinking, which comes from years of watching "offset" agreements being crafted internationally, mostly by extractive industries. Also, just fyi, my own background is private sector with an MBA in international business. This is augmented by twenty years in environmental issues, including three grants from the National Science Foundation.

What struck me about the Net Benefit Assessment as outlined in the NPS/Dept Int letter from Robert Vogel was the gross inequity between the "payout" to the public sector (NPS,etc) and that to the private sector. The only salient and relevant metric is square footage of land … 3.8 million square feet for the increased density from Alternative B and 7,000 square feet for NPS. This is the only metric that crosses over and functions as the base measure of any "trade". Without it there would be NO Alternative B.

The 3.88 million square feet will operate for at least 30 years in paying both the developer and the city. It is secured by a number of standard mechanisms that reduce risk of nonpayment and produce fairly predictable revenue streams (for 30+ years) for both the developer/owners and the city (taxes). On the other hand, the 7,000 square feet traded off come with no assurance that "improvements" will be made, but only that $12 million will be received as a one time payment … this pales in the face of the payback over a 30 year period for the developer and the city. There is high risk that any real and equitable long term return will not be made. The letter outlines a number of "Plans" will be done for "improvements". This is rather a classic way to delay an uncomfortable or costly payout. Even the mention of height limits etc are subject to the politics of the time … we all know how stable and predictable that is!

Finally, Daingerfield Island is in a FEMA designated floodplain with a new Executive Order coming out very shortly that will raise the base flood level by 2-3 feet. This makes any "improvement", short of a Dutch style solution, very costly and perhaps even undesirable. We all know the more filtration acres along the Potomac we have the better - for water quality and in the case of Alexandria, for storm water management compliance. So what exactly would "improvements" consist of? Again, it seems the answer is low cost, "no build", naturalization. So Daingerfield Island "improvement" plans seem worth $12 million … but only if the island reverts to wetlands. In other words, just take the $12 million, but only as the least the tradeoff is worth.

It is important to tap into the 30 year payback revenue stream that this tradeoff is making possible - without this tradeoff there would be NO gain of 3.8 million additional square feet of usage (density) for the life of the loan on this project. In other words, the REAL value of the 7,000 square feet of wetlands is the 30 year financial performance of the "bonus" density.

Be happy to talk more,

Kathryn

Gavin Lutz (259)

Greetings,

I'm a local resident. I know this is the EIS team but perhaps you can answer the one question I surprisingly can't find the answer to. When is the Potomac Yard Metro Station planned to be completed and operational? 2017? 2018? 2019? Thanks.

- Gavin

Troy Creasy (258)

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 Build Alternative B-CSX Design 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 benefits.

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 a 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 option is ultimately chosen and will continue to work with all affected agencies on completing this important project.

Kurt Flynn (260)

July 12, 2015

Kurt Flynn

Bob Vogel,
Regional Director
National Park Service

Melissa Barlow,
DEIS Project Manager
Federal Transit Administration

Dear Mr. Vogel and Ms. Bartlow,

On May 16, 2015 I submitted the attached comments on the Federal Transit Administration and National Park Service's Potomac Yard Metro Station Draft Environmental Impact Statement (DEIS).

While I look forward to your response to the comments, I would like to now take the opportunity to reiterate the need to supplement the DEIS because of the incorrect no action alternative. Specifically, the no action alternative, called the 'no build alternative, is describe as no station would be built. However, there is no doubt that if either or both FTA or NPS took no action, the City would construct the station anyway. This means that the DEIS's description of impacts of the no action alternative is completely wrong and the comparison of impacts between the no action and action alternatives, cited by CEQ as the "heart of the NEPA" is also completely wrong.

This is a serious blow to the NEPA compliance for both agencies and an FTA or NPS ROD based on the existing DEIS would be an arbitrary and capricious action.

Please do not hesitate to contact me if you would like to discuss further.

Sincerely,
Kurt Flynn

cc:
Peter May, NPS; Tammy Stidham, NPS; Alexcy Romero, NPS

Kurt Flynn (260)

See copy of comment starting on following page

May 16, 2015

Kurt Flynn
Much Concerned Citizen &
NEPA Practitioner, Retired
190 Sandpiper Rd
Midway, GA 31320
NEPA70@YMAIL.COM

Dear Federal Transit Administration and National Park Service,

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 is 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.

Please email if you would like to discuss my comments.

Respectfully,

Kurt Flynn

POTOMAC YARD METRORAIL STATION
Draft Environmental Impact Statement
Comments and Questions

PROPOSED ACTION

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.

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.

3. Please provide a copy of the application submitted for FTA's proposed action.

4. If application for FTA action has not been submitted, please describe why FTA determined the DEIS was necessary.

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.

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.

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.

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.

9. Please describe the Corps' NEPA compliance process for the proposed approval of the 404 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.

11. Please describe the Washington Metropolitan Area Transit Authority (WMTA) and describe its role in the proposed project.

12. Please confirm no other Federal agency besides FTA, NPS, and the Corps action will be required to approve this project.

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.

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.

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.

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.

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.

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.

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).

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.

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.

23. Please describe why the DEIS did not include mitigation for the impacts to these areas and provide the required mitigation.

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.

25. Please provide all correspondence between NPS, FTA, and the City regarding the use of Alternative B as a reasonable alternative.

26. Please describe NPS's planned NEPA compliance for the proposed project, including whether NPS plans to adopt the FTA EIS.

27. Please provide notification of public hearings or updates regarding future NPS actions.

INDIRECT & CUMULATIVE IMPACTS

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.

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.

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.

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.

NO ACTION ALTERNATIVE

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.

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 <u>if</u> 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, <u>there could be impacts</u> from the other improvements assumed <u>under this alternative</u>. 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.

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.

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.

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 exiting 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.

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.

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.

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.

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.

APPENDIX J

Other Agency Letters

U.S. Department of Interior, Office of the Secretary, Office of Environmental Policy and Compliance, May 14, 2015

U.S. Army Corps of Engineers-Norfolk District, Northern Virginia Regulatory Section, May 19, 2015

(These letters will be addressed in the Final Environmental Impact Statement.)

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

IN REPLY REFER TO:

May 14, 2015

9043.1
ER 15/0216

Melissa Barlow
Federal Transit Administration
1990 K Street NW, Suite 510
Washington, DC 20006-1178

Dear Ms. Barlow:

The Department of the Interior (Department) has reviewed the Potomac Yard Metrorail Station Draft Environmental Impact Statement (DEIS) and draft Section 4(f) Evaluation and submits the following comments in accordance with provisions of the National Transportation Act of 1966, as amended 23 U.S.C. 138 and 49 U.S.C. 303, referred to as Section 4(f), and the applicable regulations at 23 C.F.R. 774, and other regulations and guidance.

The Department understands that the Federal Transit Administration (FTA) and the City of Alexandria (COA), in cooperation with the Washington Metropolitan Area Transit Authority (WMATA) and the National Park Service (NPS) has released the DEIS and draft Section 4(f) for the proposed Potomac Yard Metrorail Station. The Project includes a new Metrorail station along the existing Metrorail Blue and Yellow Lines between the Ronald Reagan Washington National Airport Metrorail Station and the Braddock Road Metrorail Station, associated track improvements, and pedestrian bridges at Potomac Yard within Alexandria, Virginia. The NPS is a cooperating agency because of the Project's potential to impact the natural and cultural resources of the George Washington Memorial Parkway (GWMP).

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 first section, called the Mount Vernon Memorial Highway (MVMH), authorized by legislation signed by President Calvin Coolidge on May 23, 1928, was completed in 1932 to commemorate the bicentennial of George Washington's birth on February 22, 1932. The MVMH, was listed on the National Register of Historic Places (NRHP) in 1981 under criterion B for its commemoration of George Washington and under criterion C for landscape architecture. The MVMH was designed and landscaped to maximize scenic, esthetic and commemorative qualities.

As the MVMH was being completed, President Herbert Hoover signed what became known as the Capper-Cramton Act (Public Law 71-284) on May 29, 1930. This Act authorized appropriations for the GWMP, which was "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 MVMH, and proposed the protection of the northern and southern shores of the Potomac. The

GWMP was designated a National Park Unit in 1933. The GWMP was listed in the NRHP in 1995 under criterion B for its commemoration of George Washington and under criterion C for landscape architecture.

The Greens Scenic Area Easement (GSE) was acquired by the federal government in 2000 and was in keeping with the historic purpose of the GWMP as a presidential memorial and a national park. The GSE area serves to protect the values of the GWMP by preserving the natural vegetation, topography, habitat and features within the area. By providing a visual buffer from the Potomac Greens development, it allows those using the Parkway to enjoy the scenic and aesthetic qualities for which the Parkway is valued. In March 2015, the GSE was determined to be eligible for listing in the NRHP as a parcel of land which contributes to the historic scenic qualities of the MVMH.

As part of this DEIS and draft Section 4(f) screening process, 36 initial alternatives were evaluated and screened to select those that met the Project's purpose and need, were consistent with land use and development plans, and technically feasible. The DEIS and draft Section 4(f) analyzes three build alternatives, one design option, and a no-action alternative.

Build Alternative A: This alternative is located along the existing Metrorail tracks between the CSX Transportation (CSXT) railroad tracks and the north end of the Potomac Greens neighborhood, generally with the "Metrorail Reservation." This alternative would provide 24-hour pedestrian/bicycle access between Potomac Yard and Potomac Greens via one of its two pedestrian bridges. Two options for construction access and staging were analyzed: one option was from GWMP, Potomac Greens Drive and the Rail Park, with limited access from Potomac Yard and the other from Potomac Greens Drive and the Rail Park, with limited construction access from Potomac Yard.

Build Alternative B: This alternative is located between GWMP 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 GSE, administered by the NPS. This alternative would provide 24-hour pedestrian/bicycle access between Potomac Yard and Potomac Greens via one of its two pedestrian bridges. Two options for construction access and staging were analyzed: one option was from GWMP, Potomac Greens Drive and the Rail Park, with limited access from Potomac Yard and the other from Potomac Greens Drive and the Rail Park, with limited construction access from Potomac Yard.

B-CSX Design Option: This 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 GWMP property and the GSE. A separate pedestrian/bicycle bridge will provide 24-hour access between Potomac Yard and Potomac Greens. Construction access would be provided from the Rail Park and Potomac Yard.

Build Alternative D: This alternative 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. A separate pedestrian/bicycle bridge will provide 24-hour access between Potomac Yard and Potomac Greens. Construction access would be provided from GWMP, Potomac Greens Drive, the Rail Park and Potomac Yard.

Of the three build alternatives and one design option being considered, none was identified as being a preferred alternative in either the DEIS or draft Section 4(f). On April 27, 2015, the City of Alexandria announced that their staff recommendation for the locally preferred alternative to City Council was Alternative B. The City Council is scheduled to vote on the locally preferred alternative on May 20, 2015, two days after the public comment period closes.

The Department recognizes that there will be impacts to GWMP, the degree of which depends on the alternative selected. Impacts to GWMP include the permanent transfer of NPS lands to WMATA, temporary construction impacts, and impacts that would result in a change in the features and attributes of GWMP. The proposed Build Alternatives B and D would require the permanent transfer of approximately .16 acre and 1.43 acres, respectively, from NPS to WMATA.

In addition, NPS land would be impacted by temporary construction activities that would span approximately two years. Build Alternative A, Option 1 would require .30 acres of land, .25 acre of the GSE and .35 acre of NPS-regulated wetlands. Option 2 would require .13 acre of the GSE and impact .01 acre of NPS-regulated wetlands. Build Alternative B, Option 1 would require .78 acres of land, 3.09 acre of the GSE and 3.68 acre of NPS-regulated wetlands. Option 2 would require .55 acres of land, 3.09 acres of the GSE and impact 3.57 acres of NPS-regulated wetlands. Build Alternative D would require 2.40 acres of land, .02 acre of the GSE and .48 acre of NPS-regulated wetlands. Activities in the affected areas would encompass staging areas, areas for grading and drainage, the resurfacing and reconstruction of the approach roadways, and areas for re-vegetation.

Construction access from GWMP is contemplated under Option 1 for Build Alternatives A and B and are being analyzed because of potential impacts to residential communities should GWMP not be used for access. Commercial vehicles are prohibited from GWMP, with limited exceptions, under NPS Management Policies 2006 (9.2.1.2.1) and Federal Regulations (36 CFR 5.6). Access from GWMP for Build Alternatives A and B would impact two archeological sites if avoidance measures are not possible. Build Alternative D would require construction access from two locations along the GWMP and would impact one archeological site. The Department supports previous statements by the NPS that, based on impact to resources, the NPS would not provide a permit for access from the GWMP for construction purposed.

The Department understands that more information is needed regarding the exact locations of construction staging areas for Build Alternatives A, B and D and expects that more detail regarding construction staging, including avoidance and mitigation strategies, will be included in the Final Environmental Impact Statement (FEIS). The Department expects that every effort will be made to avoid or minimize the use of GWMP and the GSE for construction staging.

Visual resources and archeological resources will be impacted under Build Alternatives A, B and D. The Department agrees with FTA's preliminary determination of an adverse effect for Build Alternatives A and B on viewsheds and the cultural landscape due to the vegetation removal. The Department agrees with FTA's preliminary determination of an adverse effect for construction access Option 1 for Alternatives A and B because of the impact on two archeological resources which may be eligible for listing in the NRHP. The Department agrees with FTA's preliminary determination of an adverse effect for Build Alternative D on viewsheds and the cultural landscape due to the vegetation removal, and because of adverse effect on one archeological resource which may be eligible for listing in the NRHP.

The Department has yet to determine whether it agrees with FTA's preliminary determination of an adverse effect for B-CSX Design Option. The FTA came to this preliminary determination because of the addition of non-historic elements that would impact the views from GWMP/ MVMH. However, the need for additional visual analysis to use a single source of renderings was identified in the DEIS and will be completed as part of the Final EIS. Once this additional analysis is added, the Department can determine whether it agrees with the final FTA determination.

A number of Section 4(f) resources administered by the NPS would be affected as a result of the proposal, including GWMP, MVMH, the GSE and three archeological sites. The Department understands that additional information is needed for Section 4(f) Evaluation determination of least overall harm analysis conclusion, and that will be presented in the FEIS. Therefore the Department defers concurrence until such time that adequate information for the analysis of least overall harm has been provided.

The FEIS and the final Section 4(f) should both include more detailed information regarding construction staging and visual analysis, using a single source of renderings. Appendix G in the DEIS does not reflect that the GSE was determined eligible as a contributing property for the NRHP in March 2015 and that should be reflected in the FEIS. In addition, there is a discrepancy in acres of the GSE easement between the DEIS and Appendix G which should be resolved in the FEIS. The Department is hopeful that there will be sufficient information in the FEIS to determine the full impact of this proposal on the GWMP.

Finally, the Department understands that FTA, COA, WMATA, and NPS have collaborated very closely throughout the entirety of this project, and is appreciative of how receptive the agencies have been to the input the NPS has provide in this process. For continued coordination with NPS, please contact Tammy Stidham, Chief of Planning, Compliance & GIS, National Capital Region. Ms. Stidham can be reached by phone at 202-619-7474 or email at tammy_stidham@nps.gov.

The Department appreciates the opportunity to provide these comments.

Sincerely,

Lindy Nelson
Regional Environmental Officer

cc:
City of Alexandria, 301 King St., Room 2300, Alexandria, VA
Potomac Yard, Metrorail Station EIS, P.O. Box 16531, Alexandria, VA 22302
WMATA, 600 Fifth Street, NW, Washington, DC 20001

DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS
NORFOLK DISTRICT
FORT NORFOLK
803 FRONT STREET
NORFOLK VA 23510-1096

Reply to Attention of

May 19, 2015

Northern Virginia Regulatory Section
NAO 2012-02012 (Potomac River)

Ms. Melissa Barlow
Environmental Protection Specialist
Federal Transit Administration
1990 K Street NW, Suite 510
Washington, DC 20006-1178

Ms. Lee Farmer, AICP
Potomac Yard Projects Manager
City of Alexandria
301 King Street
Alexandria, VA 22314

Dear Ms. Barlow and Ms. Farmer:

This letter is in response to recent April 2015 Draft Environmental Impact Statement and Draft Section 4(f) Evaluation for the proposed Potomac Yard Metrorail station. The Washington Metropolitan Area Transit Authority (WMATA) is evaluating construction for the Potomac Yard Metrorail station adjacent to Mount Vernon Memorial Highway and George Washington Parkway in Alexandria, Virginia. In accordance with the National Environmental Policy Act (NEPA), an Environmental Impact Statement (EIS) is being prepared with the Federal Transit Administration (FTA) as the lead federal agency to include WMATA and the National Park Service serving as cooperating agencies. Comments are being solicited regarding the scope of the project.

On May 14, 2015, Regena Bronson of the Corps met with Mr. James Ashe to discuss the potential alternative for the proposed Metrorail station. As discussed, our regulations require that we consider a full range of public interest factors and conduct an alternatives analysis in order to identify the least environmentally damaging practicable alternative (LEDPA), which is the only alternative we can authorize. Avoidance and minimization of impacts to aquatic resources will be an important consideration in our evaluation of the alternatives.

In addition, this project is subject to compliance with Section 106 of the National Historic Preservation Act of 1966.

According to 36 CFR 800.2(a)(2):

"…If more than one Federal agency is involved in an undertaking, some or all [of] the agencies may designate a lead Federal agency, which shall identify the appropriate official to serve as the agency official who shall act on their behalf, fulfilling their collective responsibilities under section 106. Those Federal agencies that do not designate a lead Federal agency remain individually responsible for their compliance with this part."

Pursuant to the above provision, the FTA (Virginia Division) is hereby designated as the lead federal agency to fulfill the collective Federal responsibilities under Section 106 for the following undertaking, which FTA has determined will have an adverse effect on historic resources:

Mount Vernon Memorial Highway and the George Washington Parkway in Alexandria, Virginia

The Corps authorizes FHWA to conduct Section 106 coordination on its behalf. Any Memorandum of Agreement prepared by FHWA under 36 CFR 800.6 should include the following clause in the introductory text:

"WHEREAS, pursuant to Section 404 of the Clean Water Act, *a Department of the Army permit will likely be required from the Corps of Engineers for this project, and the Corps has designated FTA as the lead federal agency to fulfill federal responsibilities under Section 106; and*

In addition, the Corps hereby authorizes FTA to conduct coordination on its behalf for the Potomac Yard Metrorail Station project in accordance with Section 7 of the Endangered Species Act.

Should you have any questions, you may contact Regena Bronson at 540-548-2838 or regena.d.bronson@usace.army.mil.

Sincerely,

Tucker Smith
Chief, Northern Virginia
Regulatory Section

Copies Furnished:
Virginia Department of Historic Resources, Richmond
National Park Service, McLean

POTOMAC YARD METRORAIL STATION

ENVIRONMENTAL IMPACT STATEMENT

Staff Report Supplement – Final Staff Recommendations

Draft Environmental Impact Statement and General Plans

October 2015

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1 INTRODUCTION

This Staff Report Supplement was prepared to document and provide responses to comments received on the **Public Hearing Staff Report for the Potomac Yard Metrorail Station Draft Environmental Impact Statement**.

The Washington Metropolitan Area Transit Authority (WMATA) issued the Public Hearing Staff Report for comment on September 18, 2015. The Public Hearing Staff Report was placed online, and made available for comment at WMATA Headquarters and five other locations (See **Appendix A** for the announcement and list of locations). The comment period ended on September 28, 2015, at 5:00pm.

2 COMMENTS AND RESPONSES

This section contains the comments and responses for all comments received on the Public Hearing Staff Report during its public comment period from September 18-28, 2015 as well as comments received on the Draft EIS after May 18, 2015. WMATA received the following comments:

- David Cavanaugh
- Walter C. Clarke and John T. Long, III, City of Alexandria Chamber of Commerce
- Troy Creasy, CSXT
- Kurt Flynn (two comments)
- Gavin Lutz
- Lindy Nelson, U.S. Department of the Interior (*received by FTA during Draft EIS comment period but not available for inclusion in the WMATA Public Hearing Staff Report*)
- Kathryn Papp
- Tucker Smith, U.S. Army Corps of Engineers-Norfolk District (*received by FTA during Draft EIS comment period but not available for inclusion in the WMATA Public Hearing Staff Report*)

2.1 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”).

Responses are provided for the comment summaries. Section 2.2 contains the complete comments by author with the responses.

2.1.1 Build Alternative A

2.1.1.1 Cultural Resources

Summary of Comments: The U.S. Department of the Interior (DOI) summarized the Draft EIS assessment that visual resources and archaeological resources will be impacted under Build Alternative A and stated that the agency agrees with FTA’s preliminary determinations of adverse effect regarding Build Alternative A.

Response: Comment noted regarding DOI agreement with FTA’s preliminary determination of effect for Build Alternative A. For responses to DOI comments related to all alternatives, see Section 2.1.5 General Comment,

specifically Section 2.1.5.1 Construction Impact, Section 2.1.5.2 Cultural Resources, Section 2.1.5.4 GW Parkway Aesthetics, Section 2.1.5.6 NEPA Process and Methodology, Section 2.1.5.7 NPS Land Impacts, and Section 2.1.5.9 Section 4(f) Evaluation.

2.1.2 Build Alternative B

2.1.2.1 Cultural Resources

Summary of Comments: DOI summarized the Draft EIS assessment that visual resources and archaeological resources will be impacted under Build Alternative B and stated that the agency agrees with FTA's preliminary determinations of adverse effect regarding Build Alternative B.

Response: Comment noted regarding DOI agreement with FTA's preliminary determination of effect for Build Alternative B. For responses to DOI comments related to all alternatives, see Section 2.1.5 General Comment, specifically Section 2.1.5.1 Construction Impact, Section 2.1.5.2 Cultural Resources, Section 2.1.5.4 GW Parkway Aesthetics, Section 2.1.5.6 NEPA Process and Methodology, Section 2.1.5.7 NPS Land Impacts, and Section 2.1.5.9 Section 4(f) Evaluation.

2.1.2.2 Support Build Alternative B

Summary of Comments: One comment was submitted that expressed support for Build Alternative B as the preferred alternative, noted the economic benefits of constructing a Metrorail station at Potomac Yard, and urged the City to build it as soon as possible.

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). 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.

2.1.3 B-CSX Design Option

2.1.3.1 Amtrak, VRE, and CSX Impacts

Summary of Comments: CSXT submitted a comment 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. CSXT expressed its preference 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. *Note: this comment is a duplicate of Comment #167, which was included in the Public Hearing Staff Report with the following response*.

Response: Comment noted regarding B-CSX Design Option impacts to the CSX line. 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. 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. 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 VRE to avoid or minimize impacts to operations of freight, commuter, and passenger rail services along the CSXT line.

2.1.3.2 Cultural Resources

Summary of Comments: DOI commented that it has yet to determine whether the agency agrees with FTA's preliminary determination of an adverse effect for B-CSX Design Option due to the need for additional visual analysis.

Response: As a result of the adoption of Build Alternative B as the Preferred Alternative for evaluation in the Final EIS, further design development and analysis of B-CSX Design Option will not be conducted. For the Preferred Alternative visual resources analysis, the Final EIS will use a single source of photo renderings for the No Build Alternative and Preferred Alternative, and will also include analysis of winter (leaf-off) visual impacts using photo renderings, and evening visual impacts for the No Build Alternative and Preferred Alternative using a comparative analysis of existing light levels at the site and other Metrorail stations.

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.

For responses to DOI comments related to all alternatives, see Section 2.1.5 General Comment, specifically Section 2.1.5.1 Construction Impact, Section 2.1.5.2 Cultural Resources, Section 2.1.5.4 GW Parkway Aesthetics, Section 2.1.5.6 NEPA Process and Methodology, Section 2.1.5.7 NPS Land Impacts, and Section 2.1.5.9 Section 4(f) Evaluation.

2.1.3.3 GW Parkway Aesthetics

Summary of Comments: DOI commented that it has yet to determine whether the agency agrees with FTA's preliminary determination of an adverse effect for B-CSX Design Option due to the need for additional visual analysis.

Response: See response to this comment for Cultural Resources, Section 2.1.3.2.

2.1.4 Build Alternative D

2.1.4.1 Cultural Resources

Summary of Comments: DOI summarized the Draft EIS assessment that visual resources and archaeological resources will be impacted under Build Alternative D and stated that the agency agrees with FTA's preliminary determinations of adverse effect regarding Build Alternative D.

Response: Comment noted regarding DOI agreement with FTA's preliminary determination of effect for Build Alternative D. For responses to DOI comments related to all alternatives, see Section 2.1.5 General Comment, specifically Section 2.1.5.1 Construction Impact, Section 2.1.5.2 Cultural Resources, Section 2.1.5.4 GW Parkway Aesthetics, Section 2.1.5.6 NEPA Process and Methodology, Section 2.1.5.7 NPS Land Impacts, and Section 2.1.5.9 Section 4(f) Evaluation.

2.1.5 General Comment

2.1.5.1 Construction Impact

Summary of Comments: DOI submitted a comment supporting previous statements by NPS that the agency would not provide a permit for access from the GWMP for construction purposes. DOI stated that it expects that every effort will be made to avoid or minimize the use of the GWMP and the Greens Scenic Area easement for construction staging.

Response: Comment noted regarding permits for construction access from the GWMP. 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.

For the Preferred Alternative, the Final EIS will provide additional details on proposed mitigation measures for impacts to GWMP, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsbile agencies. Key architectural design refinements for minimizing impacts to the GWMP and Greens Scenic Area easement, 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 Final EIS and its impact evaluations. Refinements to the construction staging areas to minimize impacts to the GWMP and Greens Scenic Area easement are being considered in conjunction with the architectural design refinements and will be included in the Final EIS. Additional minor refinements proposed for mitigation of project impacts will be specified in the 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.

2.1.5.2 Cultural Resources

Summary of Comments: DOI submitted a comment describing the history of the GWMP, MVMH, and Greens Scenic Area Easement, as they relate to the project. DOI also recognized that the project will have impacts to GWMP, the degree of which depends on the alternative selected. With regard to evaluation of the impacts in the Final EIS and Section 4(F) Evaluation:

- A number of Section 4(f) resources administered by the NPS would be affected as a result of the proposal, including GWMP, MVMH, the Greens Scenic Area easement, and three archaeological sites. The Department understands that additional information is needed for Section 4(f) Evaluation determination of least overall harm analysis conclusion, and that will be presented in the FEIS. Therefore the Department defers concurrence until such time that adequate information for the analysis of least overall harm has been provided.
- DOI understands that FTA, COA, WMATA, and NPS have collaborated very closely throughout the entirety of this project, and is appreciative of how receptive the agencies have been to the input the NPS has provide in this process.
- The Final EIS and the final Section 4(f) should both include more detailed information regarding construction staging and visual analysis, using a single source of renderings.

Response: The Section 4(f) Evaluation will be updated, including the complete Least Harm Analysis, with the Final EIS.

The NRHP eligibility status of the Greens Scenic Area easement will be updated in the Final EIS. The acreage will be corrected as needed in the Final EIS.

For the Preferred Alternative, the Final EIS will provide additional details on proposed mitigation measures for impacts to GWMP, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsible agencies. Key architectural design refinements for minimizing impacts to the GWMP and Greens Scenic Area easement, 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. Refinements to the construction staging areas to minimize impacts to the GWMP and Greens Scenic Area easement are being considered in conjunction with the architectural design refinements and will be included in the Final EIS. Additional minor refinements proposed for mitigation of project impacts will be specified in the Record of Decision.

With regard to the visual resources analysis, the Final EIS will use a single source of photo renderings for the No Build Alternative and Preferred Alternative, and will also include analysis of winter (leaf-off) visual impacts using photo renderings, and evening visual impacts for the No Build Alternative and Preferred Alternative using a comparative analysis of existing light levels at the site and other Metrorail stations.

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.

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.

With regard to construction impacts to the GWMP, see also response in Section 2.1.5.1 Construction Impact.

2.1.5.3 Financial Resources

Summary of Comments: One comment expressed support for the proposed financing plan, in particular its identification of multiple funding sources.

Response: Comment regarding support of financing plan is noted.

2.1.5.4 GW Parkway Aesthetics

Summary of Comments: DOI commented that the Final EIS should include more detailed information regarding construction staging and visual analysis, using a single source of renderings to determine the full impact of the project on the GWMP.

Response: See response to this comment for Construction Impact, Section 2.1.5.1, and Cultural Resources, Section 2.1.5.2.

2.1.5.5 GW Parkway Environmental Mitigation

Summary of Comments: One comment was received stating that there is a gross inequity between mitigation commitments for the GWMP and the Potomac Yard development in the tentative net benefit agreement between NPS and the City of Alexandria.

Response: Any action taken by NPS in conjunction with this project, including a final Net Benefit Agreement and planned improvements to Daingerfield Island, 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.” 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 Appendic F of the Draft EIS.

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: (www.alexandriava.gov/PotomacYard) and also as in the WMATA *Public Hearing Staff Report*, Appendix G.

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.

2.1.5.6 NEPA Process and Methodology

Several comments were received regarding issues of NEPA Process, including reviews under related federal legislation.

Summary of Comments: One comment was received from DOI, stating the following in regard to NEPA Process and Methodology:

- A number of Section 4(f) resources administered by the NPS would be affected as a result of the proposal, including GWMP, MVMH, the Greens Scenic Area easement, and three archaeological sites. The Department understands that additional information is needed for Section 4(f) Evaluation determination of least overall harm analysis conclusion, and that will be presented in the FEIS. Therefore the Department defers concurrence until such time that adequate information for the analysis of least overall harm has been provided.
- DOI understands that FTA, COA, WMATA, and NPS have collaborated very closely throughout the entirety of this project, and is appreciative of how receptive the agencies have been to the input the NPS has provide in this process.
- The Final EIS and the final Section 4(f) should both include more detailed information regarding construction staging and visual analysis, using a single source of renderings.

Response: See response to this comment for Cultural Resources, Section 2.1.5.2.

Summary of Comments: One comment was received from the U.S. Army Corps of Engineers (USACE) Norfolk District:

- USACE regulations regarding Section 404 of the Clean Water Act require that it consider a full range of public interest factors and conduct an alternatives analysis to identify the least environmentally damaging practicable alternative (LEDPA), which is the only alternative the agency can authorize. Avoidance and minimization of impacts to aquatic resources will be an important consideration in its evaluation of the alternatives.
- USACE authorizes FTA to conduct coordination on its behalf for Section 106 of the National Historic Preservation Act and Section 7 of the Endangered Species Act.

Response: FTA will continue project coordination with USACE in regard to NEPA and Section 404 of the Clean Water Act, including analysis to identify the LEDPA. Design refinements to avoid and minimize environmental impacts by the project are ongoing and will be presented in the Final EIS.

As the lead federal agency FTA will also fulfil its responsibilities under Section 106 of the National Historic Preservation Act and Section 7 of the Endangered Species Act. FTA will continue to coordinate Section 106 review of the project with USACE and will circulate the Section 106 Effects Assessment report to USACE for its review as a Consulting Party in the Section 106 process. FTA will update its Section 7 review in the Final EIS, and will circulate the Final EIS to USACE for its review as a Participating Agency in the NEPA process.

Summary of Comments: Two comments were received from the same commenter, attaching comments previously submitted during the Draft EIS public comment period and raising the following issues in the cover letter:

- In the May 16, 2015, City of Alexandria staff presentation to the City Council, the FTA grant was noted as a potential funding source that the City was not dependent upon for construction of the station. Thus, it is clear beyond all doubt the City would construct the station under the no action alternative, and the DEIS needs to be supplemented with the correct description of the no action alternative impacts.
- Equally important, the DEIS's project purpose, "to improve local and regional transit accessibility", would be met through the Federal no action alternative. Because the stated purpose does not include providing the City with a quicker return on its investment and a financial windfall, and because the project purpose would be met in the case of no Federal action, approval of the grant or right of way by FTA and NPS would be the essence of arbitrary or capricious or abuse of discretion in direct violation of the Administrative Procedure Act.
- The two comments forwarded as attachments previously submitted comments that were included in the WMATA Public Hearing Staff Report with responses provided (Comment #157).

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. FTA assumes the project would not

occur in the absence of Federal funding. The No Build Alternative is presented properly in the Draft EIS for NEPA purposes.

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.

2.1.5.7 NPS Land Impacts

Summary of Comments: DOI submitted a comment recognizing that the project will have impacts to GWMP, the degree of which depends on the alternative selected.

Response: See response to this comment for Construction Impact, Section 2.1.5.1, and Cultural Resources, Section 2.1.5.2.

2.1.5.8 Other

Summary of Comments: Two comments were received with concerns that did not fall within the broader topics of other comments. These included the following questions:

- When is the station planned to be completed and operational?
- Where are the staff responses to the public comments?

Response: Although the Draft EIS assumes an Opening Year of 2016, the current project schedule indicates a later opening date, which will be reviewed and revised as part of development of the Final EIS.

Section 5 of the WMATA *Public Hearing Staff Report* contains the comments received on the Draft EIS and provides responses. These comments and responses will also be included in the Final EIS.

2.1.5.9 Section 4(f) Evaluation

Summary of Comments: DOI submitted a comment stating that a number of Section 4(f) resources administered by the NPS would be affected as a result of the project, including GWMP, MVMH, the Greens Scenic Area easement, and three archaeological sites. DOI also noted that they defer concurrence until adequate information for the analysis of least overall harm has been provided.

Response: Comment noted regarding project effects to Section 4(f) resources administered by NPS. The Section 4(f) Evaluation will be updated, including the complete Least Harm Analysis, with the Final EIS.

2.2 Detailed Comments and Responses

This section provides the complete comments that are summarized above in Section 2.1 by author. The comments and responses below are sorted alphabetically by the author's last name, with a unique comment ID number for each:

- David Cavanaugh (262)
- Walter C. Clarke and John T. Long, III, City of Alexandria Chamber of Commerce (252)
- Troy Creasy, CSXT (258)
- Kurt Flynn (261)

- Kurt Flynn (260)
- Gavin Lutz (259)
- Lindy Nelson, U.S. Department of the Interior (263)
- Kathryn Papp (215)
- Tucker Smith, U.S. Army Corps of Engineers-Norfolk District (264)

2.2.1 David Cavanaugh (262)

(1-5-27-2-262): Where are the staff responses to the public comments? "The document addresses comments on the proposal received at the public hearing held on April 30, 2015, as well as comments received during the public comment period." Where are they? There should be a staff response to each non annotated, specific comment. Providing the written or oral comments is insufficient and doesn't comply with DOT/NEPA requirements.

Response: Section 5 of the Public Hearing Staff Report contains the comments received on the Draft EIS and provides responses. These comments and responses will also be included in the Final EIS. *(1-5-27, 7)*

2.2.2 Walter C. Clarke and John T. Long, III, City of Alexandria Chamber of Commerce (252)

(6-2-23-2-252):

As part of the Alexandria Chamber of Commerce's 2015 Legislative Agenda, the Chamber Board of Directors identified the Potomac Yard Metro as the primary focus item for this legislative term. To briefly review, the Chamber stated the following about the Metro:

"Alexandria 's primary opportunity to realize economic development necessary to balance and grow our tax base lies within Potomac Yard Redevelopment of Potomac Yard will create a vibrant mixed use community of residences, hotels and office, retail and open space -- all with 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 Coordinated Development District plans contemplate and depend upon Metro service. Constructing a new Metro station at Potomac Yard, is critical to successful redevelopment."

The Alexandria Chamber of Commerce continues to be extremely committed to bringing metro to Potomac Yard and has been pleased with the progress the City has made to date. Given the Chamber's previous support, we formally endorse the City's professional staff recommended position of locating the new Potomac Yard Metro at Alternative B as soon as possible.

Robust commercial development of Potomac Yard is critical in order to responsibly meet the debt obligations the City will incur as a result of building the station. The City must maximize the potential for commercial development in this area in order to meet its projected revenue numbers. Recent reports have indicated that a staggering 86% of new commercial development in the Washington, DC region is occurring within 1/4 mile of a Metro station. If Alexandria is to make itself competitive for significant future commercial real estate opportunities, building the Potomac Yard Metro and selecting Alternative B is the most logical course of action.

The Chamber would like to also applaud the City for identifying multiple funding sources in order to pay for the Potomac Yard Metro. We would like to endorse the current financing plan that has been proposed and would encourage you to continue to apply this financing strategy to future transportation projects around the City. We feel the common-sense financing strategy that has been developed for the Potomac Yard Metro should be the model for these types of revenue- generating infrastructure investments in the future.

In closing, we would like to congratulate the City for its efforts to date to bring the Potomac Yard Metro to reality. This Metro station, which is an historic investment for Alexandria, will play a vital role in keeping our city

competitive for major commercial activity for years to come. We urge you to "build" the City staff recommended site of Alternative B as soon as possible and maintain the current financing strategy to pay for the station.

We would like to thank you for the opportunity to comment on the building of the Potomac Yard Metro and look forward to working with you, the Council and the City Administration on bringing this sought- after project to our city.

Response: Comments regarding support of the financing plan are noted. *(6-5-9, 8)*

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). 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)*

2.2.3 Troy Creasy, CSXT (258)

(5-3-2-2-258): 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 Build Alternative B-CSX Design 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 benefits.

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 a 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 option is ultimately chosen and will continue to work with all affected agencies on completing this important project.

Note: This comment is a duplicate of Comment #167, which was submitted separately during the public comment period for the Draft EIS and is included in the Public Hearing Staff report with the following response.

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)*

2.2.4 Kurt Flynn (261)

2.2.4.1 Comment 261 Cover Letter

(1-5-33-2-261, 1):

I previously submitted the attached comments on the Potomac Yard Metro Station Draft Environmental Impact Statement (DEIS). I look forward to the Federal Transit Administration (FTA) and National Park Service's (NPS) responses to the comments, which focused on compliance with the National Environmental Policy Act (NEPA). However, there is an additional concern regarding the potential direct violation of the Administrative Procedure Act.

In a meeting on May 16, 2015, the City Council voted to approve Alternative B as the locally preferred alternative. In the staff presentation before the vote, the FTA grant was noted as a potential funding source that the City was not dependent upon for construction of the station. According to staff, the FTA grant was not even considered in the City's financial projections, which show that Alternative B will result in approximately $1.5 billion in net revenue over forty years. As stated by the staff report, without FTA funding, by "the end of that period, the development in Potomac Yard will be producing approximately $98 million of revenue every year beyond what is needed to pay for the station and City services for the residents and businesses in Potomac Yard. This means redevelopment of Potomac Yard will be producing $98 million every year that can be used to pay for services and amenities throughout the City". Thus, it is no longer suspected that the City would construct the metro station if FTA selected the no action alternative. At this point, it is clear beyond all doubt the City would construct under no action.

The same has always been true if NPS selected the no action alternative. The NPS's proposed action is to approve the City's request to use portions of the GW Parkway to construct and operate Alternative B. If NPS did not approve the Parkway construction, the City would simply construct the station at another alternative location.

So in both cases, no Federal action means the station would be constructed and the DEIS needs to be supplemented with the correct description of the no action alternative impacts.

Equally important and the subject of this letter is, because the station would be constructed the DEIS's project purpose, "to improve local and regional transit accessibility", would be met through the Federal no action

alternative. Because the stated purpose does not include providing the City with a quicker return on its investment and a financial windfall, and because the project purpose would be met in the case of no Federal action, approval of the grant or right of way by FTA and NPS would be the essence of arbitrary or capricious or abuse of discretion in direct violation of the Administrative Procedure Act.

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. FTA assumes the project would not occur in the absence of Federal funding. *(1-5-33, 48)*

2.2.4.2 Comment 261 Attachment

(1-5-33-2-261, 2):

(Note: this attachment (May 16 cover letter and attached detailed comments) was submitted separately during the public comment period for the Draft EIS and is included in the Public Hearing Staff Report as Comment #157 with responses provided. Those responses are copied below for reference.)

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 is 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.

Please email if you would like to discuss my comments.

POTOMAC YARD METRORAIL STATION
Draft Environmental Impact Statement
Comments and Questions

PROPOSED ACTION

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.

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.

3. Please provide a copy of the application submitted for FTA's proposed action.

4. If application for FTA action has not been submitted, please describe why FTA determined the DEIS was necessary.

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.

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.

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.

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.

9. Please describe the Corps' NEPA compliance process for the proposed approval of the 404 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.

11. Please describe the Washington Metropolitan Area Transit Authority (WMTA) and describe its role in the proposed project.

12. Please confirm no other Federal agency besides FTA, NPS, and the Corps action will be required to approve this project.

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.

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.

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.

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.

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.

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.

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).

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.

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.

23. Please describe why the DEIS did not include mitigation for the impacts to these areas and provide the required mitigation.

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.

25. Please provide all correspondence between NPS, FTA, and the City regarding the use of Alternative B as a reasonable alternative.

26. Please describe NPS's planned NEPA compliance for the proposed project, including whether NPS plans to adopt the FTA EIS.

27. Please provide notification of public hearings or updates regarding future NPS actions.

INDIRECT & CUMULATIVE IMPACTS

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.

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.

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.

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.

NO ACTION ALTERNATIVE

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.

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.

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.

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.

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 exiting 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.

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.

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.

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.

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:

1. 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)*

2. 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)*

3. 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)*

4. 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)*

5. 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)*

6. 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)*

7. 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)*

8. 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)*

9. 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)*

10. 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)*

11. 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)*

12. 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)*

13. 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)*

14. 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)*

15. 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)*

16. 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)*

17. 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)*

18. 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)*

19. 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 the *Public Hearing Staff Report*. *(1-5-9, 5)*

20. 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 the *Public Hearing Staff 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)*

21. 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)*

22. 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)*

23. 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)*

24. 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 the *Public Hearing Staff 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)*

25. 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)*

26. 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)*

27. 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)*

28. 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)*

29. 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)*

30. 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)*

31. 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)*

32. The Draft EIS, Section 3.4.3.8, describes the amount of development assumed for the No Build Alternative. *(1-5-33, 29)*

33. 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)*

34. 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)*

35. 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)*

36. 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)*

37. The Draft EIS, Section 2.1, describes the local planning process for the project. *(1-5-33, 34)*

38. 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)*

39. 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)*

40. 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)*

2.2.5 Kurt Flynn (260)

2.2.5.1 Comment 260 Cover Letter

(1-5-33-2-260, 1):

On May 16, 2015 I submitted the attached comments on the Federal Transit Administration and National Park Service's Potomac Yard Metro Station Draft Environmental Impact Statement (DEIS).

While I look forward to your response to the comments, I would like to now take the opportunity to reiterate the need to supplement the DEIS because of the incorrect no action alternative. Specifically, the no action alternative, called the 'no build alternative, is describe as no station would be built. However, there is no doubt that if either or both FTA or NPS took no action, the City would construct the station anyway. This means that the DEIS's description of impacts of the no action alternative is completely wrong and the comparison of impacts between the no action and action alternatives, cited by CEQ as the "heart of the NEPA" is also completely wrong.

This is a serious blow to the NEPA compliance for both agencies and an FTA or NPS ROD based on the existing DEIS would be an arbitrary and capricious action.

Please do not hesitate to contact me if you would like to discuss further.

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, 49)*

2.2.5.2 Comment 260 Attachment

(1-5-33-2-260, 2): *The attachment to the cover letter dated July 12, 2015, is the same attachment included in Section 2.2.4.2 with Comment #261.*

Response: *Responses to the attachment with the July 12 letter were provided in the Public Hearing Staff Report (see Comment #157) and are provided in Section 2.2.4.2, Comment #261.*

2.2.6 Gavin Lutz (259)

(1-5-27-2-259):

I'm a local resident. I know this is the EIS team but perhaps you can answer the one question I surprisingly can't find the answer to. When is the Potomac Yard Metro Station planned to be completed and operational? 2017? 2018? 2019? Thanks.

Response: Although the Draft EIS assumes an Opening Year of 2016, the current project schedule indicates a later opening date, which will be reviewed and revised as part of development of the Final EIS. *(1-5-27, 8)*

2.2.7 Lindy Nelson, U.S. Department of the Interior (263)

(3-5-33-2-263): The Department of the Interior (Department) has reviewed the Potomac Yard Metrorail Station Draft Environmental Impact Statement (DEIS) and draft Section 4(f) Evaluation and submits the following comments in accordance with provisions of the National Transportation Act of 1966, as amended 23 U.S.C. 138 and 49 U.S.C. 303, referred to as Section 4(f), and the applicable regulations at 23 C.F.R. 774, and other regulations and guidance.

The Department understands that the Federal Transit Administration (FTA) and the City of Alexandria (COA), in cooperation with the Washington Metropolitan Area Transit Authority (WMATA) and the National Park Service (NPS) has released the DEIS and draft Section 4(f) for the proposed Potomac Yard Metrorail Station. The Project includes a new Metrorail station along the existing Metrorail Blue and Yellow Lines between the Ronald Reagan Washington National Airport Metrorail Station and the Braddock Road Metrorail Station, associated track improvements, and pedestrian bridges at Potomac Yard within Alexandria, Virginia. The NPS is a cooperating agency because of the Project's potential to impact the natural and cultural resources of the George Washington Memorial Parkway (GWMP).

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 first section, called the Mount Vernon Memorial Highway (MVMH), authorized by legislation signed by President Calvin Coolidge on May 23, 1928, was completed in 1932 to commemorate the bicentennial of George Washington's birth on February 22, 1932. The MVMH, was listed on the National Register of Historic Places (NRHP) in 1981 under criterion B for its commemoration of George Washington and under criterion C for landscape architecture. The MVMH was designed and landscaped to maximize scenic, esthetic and commemorative qualities.

As the MVMH was being completed, President Herbert Hoover signed what became known as the Capper-Cramton Act (Public Law 71-284) on May 29, 1930. This Act authorized appropriations for the GWMP, which was "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 MVMH, and proposed the protection of the northern and southern shores of the Potomac. The GWMP was designated a National Park Unit in 1933. The GWMP was listed in the NRHP in 1995 under criterion B for its commemoration of George Washington and under criterion C for landscape architecture.

The Greens Scenic Area Easement (GSE) was acquired by the federal government in 2000 and was in keeping with the historic purpose of the GWMP as a presidential memorial and a national park. The GSE area serves to protect the values of the GWMP by preserving the natural vegetation, topography, habitat and features within the area. By providing a visual buffer from the Potomac Greens development, it allows those using the Parkway to enjoy the scenic and aesthetic qualities for which the Parkway is valued. In March 2015, the GSE was determined to be eligible for listing in the NRHP as a parcel of land which contributes to the historic scenic qualities of the MVMH.

As part of this DEIS and draft Section 4(f) screening process, 36 initial alternatives were evaluated and screened to select those that met the Project's purpose and need, were consistent with land use and development plans, and technically feasible. The DEIS and draft Section 4(f) analyzes three build alternatives, one design option, and a no-action alternative.

Build Alternative A: This alternative is located along the existing Metrorail tracks between the CSX Transportation (CSXT) railroad tracks and the north end of the Potomac Greens neighborhood, generally with the "Metrorail Reservation." This alternative would provide 24-hour pedestrian/bicycle access between Potomac Yard and Potomac Greens via one of its two pedestrian bridges. Two options for construction access and staging were analyzed: one option was from GWMP, Potomac Greens Drive and the Rail Park, with limited access from Potomac Yard and the other from Potomac Greens Drive and the Rail Park, with limited construction access from Potomac Yard.

Visual resources and archeological resources will be impacted under Build Alternatives A, B and D. The Department agrees with FTA's preliminary determination of an adverse effect for Build Alternatives A and B on viewsheds and the cultural landscape due to the vegetation removal. The Department agrees with FTA's preliminary determination of an adverse effect for construction access Option 1 for Alternatives A and B because

of the impact on two archeological resources which may be eligible for listing in the NRHP. The Department agrees with FTA's preliminary determination of an adverse effect for Build Alternative D on viewsheds and the cultural landscape due to the vegetation removal, and because of adverse effect on one archeological resource which may be eligible for listing in the NRHP.

The Department has yet to determine whether it agrees with FTA's preliminary determination of an adverse effect for B-CSX Design Option. The FTA came to this preliminary determination because of the addition of non-historic elements that would impact the views from GWMP/ MVMH. However, the need for additional visual analysis to use a single source of renderings was identified in the DEIS and will be completed as part of the Final EIS. Once this additional analysis is added, the Department can determine whether it agrees with the final FTA determination.

A number of Section 4(f) resources administered by the NPS would be affected as a result of the proposal, including GWMP, MVMH, the GSE and three archeological sites. The Department understands that additional information is needed for Section 4(f) Evaluation determination of least overall harm analysis conclusion, and that will be presented in the FEIS. Therefore the Department defers concurrence until such time that adequate information for the analysis of least overall harm has been provided.

The FEIS and the final Section 4(f) should both include more detailed information regarding construction staging and visual analysis, using a single source of renderings. Appendix G in the DEIS does not reflect that the GSE was determined eligible as a contributing property for the NRHP in March 2015 and that should be reflected in the FEIS. In addition, there is a discrepancy in acres of the GSE easement between the DEIS and Appendix G which should be resolved in the FEIS.The Department is hopeful that there will be sufficient information in the FEIS to determine the full impact of this proposal on the GWMP.

Finally, the Department understands that FTA, COA, WMATA, and NPS have collaborated very closely throughout the entirety of this project, and is appreciative of how receptive the agencies have been to the input the NPS has provide in this process. For continued coordination with NPS, please contact Tammy Stidham, Chief of Planning, Compliance & GIS, National Capital Region. Ms. Stidham can be reached by phone at 202-619-7474 or email at tammy_stidham@nps.gov.

The Department appreciates the opportunity to provide these comments.

Response: Comments summarizing the description of the project and the impacts to the GWMP and Greens Scenic Area easement, as reported in the Draft EIS, are noted.

In regard to construction access from the GWMP: 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.

For the Preferred Alternative, the Final EIS will provide additional details on proposed mitigation measures for impacts to GWMP, incorporating agreements among the project sponsor (the City of Alexandria), the National Park Service, and other responsbile agencies. Key architectural design refinements for minimizing impacts to the GWMP and Greens Scenic Area easement, 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. Refinements to the construction staging areas to minimize impacts to the GWMP and Greens Scenic Area easement are being considered in conjunction with the architectural design refinements and will be included in the Final EIS. Additional minor refinements proposed for mitigation of project impacts will be specified in the 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.

As a result of the adoption of Build Alternative B as the Preferred Alternative for evaluation in the Final EIS, further design development and analysis of B-CSX Design Option, including additional visual analysis of the alternative using a single source of renderings will not be conducted.

For the Preferred Alternative visual resources analysis, the Final EIS will use a single source of photo renderings for the No Build Alternative and Preferred Alternative, and will also include analysis of winter (leaf-off) visual impacts using photo renderings, and evening visual impacts for the No Build Alternative and Preferred Alternative using a comparative analysis of existing light levels at the site and other Metrorail stations.

The Section 4(f) Evaluation will be updated, including the complete Least Harm Analysis, with the Final EIS.

The NRHP eligibility status of the Greens Scenic Area easement will be updated in the Final EIS. The acreage will be corrected as needed in the Final EIS. *(3-5-33, 49)*

2.2.8 Kathryn Papp (215)

(1-5-11-2-215):

I apologize for ducking on the Net Benefit Assessment issue. Here is my thinking, which comes from years of watching "offset" agreements being crafted internationally, mostly by extractive industries. Also, just fyi, my own background is private sector with an MBA in international business. This is augmented by twenty years in environmental issues, including three grants from the National Science Foundation.

What struck me about the Net Benefit Assessment as outlined in the NPS/Dept Int letter from Robert Vogel was the gross inequity between the "payout" to the public sector (NPS,etc) and that to the private sector. The only salient and relevant metric is square footage of land … 3.8 million square feet for the increased density from Alternative B and 7,000 square feet for NPS. This is the only metric that crosses over and functions as the base measure of any "trade". Without it there would be NO Alternative B.

The 3.88 million square feet will operate for at least 30 years in paying both the developer and the city. It is secured by a number of standard mechanisms that reduce risk of nonpayment and produce fairly predictable revenue streams (for 30+ years) for both the developer/owners and the city (taxes). On the other hand, the 7,000 square feet traded off come with no assurance that "improvements" will be made, but only that $12 million will be received as a one time payment … this pales in the face of the payback over a 30 year period for the developer and the city. There is high risk that any real and equitable long term return will not be made. The letter outlines a number of "Plans" will be done for "improvements". This is rather a classic way to delay an uncomfortable or costly payout. Even the mention of height limits etc are subject to the politics of the time … we all know how stable and predictable that is!

Finally, Daingerfield Island is in a FEMA designated floodplain with a new Executive Order coming out very shortly that will raise the base flood level by 2-3 feet. This makes any "improvement", short of a Dutch style solution, very costly and perhaps even undesirable. We all know the more filtration acres along the Potomac we have the better - for water quality and in the case of Alexandria, for storm water management compliance. So what exactly would "improvements" consist of? Again, it seems the answer is low cost, "no build", naturalization. So Daingerfield Island "improvement" plans seem worth $12 million … but only if the island reverts to wetlands. In other words, just take the $12 million, but only as the least the tradeoff is worth.

It is important to tap into the 30 year payback revenue stream that this tradeoff is making possible - without this tradeoff there would be NO gain of 3.8 million additional square feet of usage (density) for the life of the loan on this project. In other words, the REAL value of the 7,000 square feet of wetlands is the 30 year financial performance of the "bonus" density.

Response: Any action taken by NPS in conjunction with this project, including a final Net Benefit Agreement and planned improvements to Daingerfield Island, 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.” 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 Appendic F of the Draft EIS.

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: (www.alexandriava.gov/PotomacYard) and also as in the WMATA *Public Hearing Staff Report*, Appendix G.

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. *(1-5-11, 2)*

2.2.9 Tucker Smith, U.S. Army Corps of Engineers-Norfolk District (264)

(3-5-33-2-264): This letter is in response to recent April 2015 Draft Environmental Impact Statement and Draft Section 4(f) Evaluation for the proposed Potomac Yard Metrorail station. The Washington Metropolitan Area Transit Authority (WMATA) is evaluating construction for the Potomac Yard Metrorail station adjacent to Mount Vernon Memorial Highway and George Washington Parkway in Alexandria, Virginia. In accordance with the National Environmental Policy Act (NEPA), an Environmental Impact Statement (EIS) is being prepared with the Federal Transit Administration (FTA) as the lead federal agency to include WMATA and the National Park Service serving as cooperating agencies. Comments are being solicited regarding the scope of the project.

On May 14, 2015, Regena Bronson of the Corps met with Mr. James Ashe to discuss the potential alternative for the proposed Metrorail station. As discussed, our regulations require that we consider a full range of public interest factors and conduct an alternatives analysis in order to identify the least environmentally damaging practicable alternative (LEDPA), which is the only alternative we can authorize. Avoidance and minimization of impacts to aquatic resources will be an important consideration in our evaluation of the alternatives.

In addition, this project is subject to compliance with Section 106 of the National Historic Preservation Act of 1966.

According to 36 CFR 800.2(a)(2):

"…*If more than one Federal agency is involved in an undertaking, some or all [of] the agencies may designate a lead Federal agency, which shall identify the appropriate official to serve as the agency official who shall act on their behalf, fulfilling their collective responsibilities under section 106. Those Federal agencies that do not designate a lead Federal agency remain individually responsible for their compliance with this part*."

Pursuant to the above provision, the FTA (Virginia Division) is hereby designated as the lead federal agency to fulfill the collective Federal responsibilities under Section 106 for the following undertaking, which FTA has determined will have an adverse effect on historic resources:

Mount Vernon Memorial Highway and the George Washington Parkway in Alexandria, Virginia

The Corps authorizes FHWA to conduct Section 106 coordination on its behalf. Any Memorandum of Agreement prepared by FHWA under 36 CFR 800.6 should include the following clause in the introductory text:

"*WHEREAS, pursuant to Section 404 of the Clean Water Act, a Department of the Army permit will likely be required from the Corps of Engineers for this project, and the Corps has designated FTA as the lead federal agency to fulfill federal responsibilities under Section 106; and*

In addition, the Corps hereby authorizes FTA to conduct coordination on its behalf for the Potomac Yard Metrorail Station project in accordance with Section 7 of the Endangered Species Act.

Should you have any questions, you may contact Regena Bronson at 540-548-2838 or regena.d.bronson@usace.army.mil.

Response: FTA will continue project coordination with USACE in regard to the NEPA and Section 404 of the Clean Water Act, including analysis to identify the LEDPA. Design refinements to avoid and minimize environmental impacts by the project are ongoing and will be presented in the Final EIS.

As the lead federal agency FTA will also fulfil its responsibilities under Section 106 of the National Historic Preservation Act and Section 7 of the Endangered Species Act. FTA will continue to coordinate Section 106 review of the project with USACE and will circulate the Section 106 Effects Assessment report to USACE for its review as a Consulting Party in the Section 106 process. FTA will update its Section 7 review in the Final EIS, which FTA will circulate to USACE for its review as a Participating Agency in the NEPA process. *(3-5-33, 50)*

3 STAFF ANALYSIS

After the close of the Draft EIS comment period on May 18, 2015, eight additional comments were received via email. During the Public Hearing Staff Report comment period from September 18, 2015, through September 28, 2015, one comment was received via email. **Table 3-1** summarizes commenters by organizational affiliation – individual, federal, state, or local agency, non-profit or business.

Table 3-1 Commenters by Organization

Organization	Number of Comments
Individual	5
State Government	0
Non-profit / Community Organization	1
Local Government	0
Federal Government	2
Business	1
Total	9

4 STAFF RECOMMENDATION

After reviewing the written and oral testimony, WMATA staff recommends the continued refinement of Build Alternative B, Option 2 Construction Access (no access from the GWMP roadway) 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.

Design refinements for Build Alternative B are currently being developed to avoid, minimize, and mitigate its impacts identified in the Draft EIS and to address comments received. Key architectural refinements, which include modifications to the retaining wall and fill areas around the station, and resulting station height

relative to grade level, will be included in the Final EIS and its impact evaluations. Impacts to some resources will be presented as a range, based on the design options currently under consideration by the project sponsor and cooperating agencies. As the design process is ongoing, the finalized design concept (with features and impacts within the range of the two current options) and additional minor refinements proposed for mitigation of project impacts will be included in the Record of Decision.

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.

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APPENDIX A

Notice of Public Hearing Staff Report Availability

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Draft Environmental Impact Statement and Plans for the Proposed Potomac Yard Metrorail Station Alexandria, Virginia Docket R15-01

PUBLIC HEARING REPORT AVAILABLE FOR INSPECTION

Notice is hereby given that the Proposed Potomac Yard Metrorail Station Public Hearing Staff Report is available for review and comment from September 18 - 28, 2015. The document addresses comments on the proposal received at the public hearing held on April 30, 2015, as well as comments received during the public comment period. This comment period on the Public Hearing Staff Report is your opportunity to make sure your comments were accurately characterized in the Staff Report, and send clarification if desired. Comments on the Public Hearing Report will be accepted until 5 p.m. on September 28, 2015. The report is available on-line at www.wmata.com/hearings and during business hours at the following locations:

WMATA
Office of the Secretary
600 Fifth Street, NW
Washington, DC 20001
202-962-2511
(Please call in advance to coordinate)

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

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

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

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

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

HOW TO SUBMIT WRITTEN COMMENTS ON THE PUBLIC HEARING REPORT

Written statements and exhibits must be received by 5 p.m. on Monday, September 28, 2015, and may be emailed to writtentestimony@wmata.com, or mailed to the Office of the Secretary, Washington Metropolitan Area Transit Authority, 600 Fifth Street, NW, Washington, D.C. 20001. Please reference the Docket Number R15-01 in your submission. All comments received become a part of the public record, is made available to the public and may be posted, without change, to www.wmata.com/hearings, including any personal information provided.

metro

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APPENDIX B

Comments Submitted for Public Record (without Annotations)

David Cavanaugh (262)

Walter C. Clarke and John T. Long, III, City of Alexandria Chamber of Commerce (252)

Troy Creasy, CSXT (258)

Kurt Flynn (261)

Kurt Flynn (260)

Gavin Lutz (259)

Lindy Nelson, U.S. Department of the Interior (263)

Kathryn Papp (215)

Tucker Smith, U.S. Army Corps of Engineers-Norfolk District (264)

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Comment ID 262

First Name David

Last Name Cavanaugh

Organization

Collection Method

Email

Commenter Type

Individual

Comment

Where are the staff responses to the public comments?

"The document addresses comments on the proposal received at the public hearing held on April 30, 2015, as well as comments received during the public comment period." Where are they?

There should be a staff response to each non annotated, specific comment. Providing the written or oral comments is insufficient and doesn't comply with DOT/NEPA requirements.

Sent from my iPad

Comment ID	252
First Name	Walter C.
Last Name	Clarke
First Name	John T.
Last Name	Long, III
Organization	City of Alexandria Chamber of Commerce

Collection Method

Alexandria City Government

Commenter Type

Non-profit / Community Organization

Comment

Dear Mayor Euille:

As part of the Alexandria Chamber of Commerce's 2015 Legislative Agenda, the Chamber Board of Directors identified the Potomac Yard Metro as the primary focus item for this legislative term. To briefly review, the Chamber stated the following about the Metro:

"Alexandria 's primary opportunity to realize economic development necessary to balance and grow our tax base lies within Potomac Yard Redevelopment of Potomac Yard will create a vibrant mixed use community of residences, hotels and office, retail and open space - - all with 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 Coordinated Development District plans contemplate and depend upon Metro service. Constructing a new Metro station at Potomac Yard, is critical to successful redevelopment."

The Alexandria Chamber of Commerce continues to be extremely committed to bringing metro to Potomac Yard and has been pleased with the progress the City has made to date. Given the Chamber's previous support, we formally endorse the City's professional staff recommended position of locating the new Potomac Yard Metro at Alternative B as soon as possible.

Robust commercial development of Potomac Yard is critical in order to responsibly meet the debt obligations the City will incur as a result of building the station. The City must maximize the potential for commercial development in this area in order to meet its projected revenue numbers. Recent reports have indicated that a staggering 86% of new commercial development in the Washington, DC region is occurring within 1/4 mile of a Metro station. If Alexandria is to make itself competitive for significant future commercial real estate opportunities, building the Potomac Yard Metro and selecting Alternative B is the most logical course of action.

The Chamber would like to also applaud the City for identifying multiple funding sources in order to pay for the Potomac Yard Metro. We would like to endorse the current financing plan that has been proposed and would encourage you to continue to apply this financing strategy to future transportation projects around the City. We feel the common-sense financing strategy that has been developed for the Potomac Yard Metro should be the model for these types of revenue-generating infrastructure investments in the future.

In closing, we would like to congratulate the City for its efforts to date to bring the Potomac Yard Metro to reality. This Metro station, which is an historic investment for Alexandria, will play a vital role in keeping our city competitive for major commercial activity for years to come. We urge you to "build" the City staff recommended site of Alternative B as soon as possible and maintain the current financing strategy to pay for the station.

We would like to thank you for the opportunity to comment on the building of the Potomac Yard Metro and look forward to working with you, the Council and the City Administration on bringing this sought-after project to our city.

Sincerely,

William C. Clarke 2015 Board Chairman

Alexandria Chamber of Commerce

John T. Long, III President and CEO

Alexandria Chamber of Commerce

Comment ID	258
First Name	Troy
Last Name	Creasy
Organization	CSXT

Collection Method	Commenter Type
Email	Business

Comment

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 Build Alternative B-CSX Design 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 benefits.

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 a 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 option is ultimately chosen and will continue to work with all affected agencies on completing this important project.

Sincerely,

Troy Creasy

Project Manager II – Public Projects

Comment ID 261

First Name Kurt

Last Name Flynn

Organization

Collection Method

Email

Commenter Type

Individual

Comment

June 2, 2015

Kurt Flynn

Midway GA, 31320

Terry Garcia Crews, Regional Administrator
Federal Transit Administration

Bob Vogel, Regional Director
National Park Service

Dear Ms. Crews and Mr. Vogel,

I previously submitted the attached comments on the Potomac Yard Metro Station Draft Environmental Impact Statement (DEIS). I look forward to the Federal Transit Administration (FTA) and National Park Service's (NPS) responses to the comments, which focused on compliance with the National Environmental Policy Act (NEPA). However, there is an additional concern regarding the potential direct violation of the Administrative Procedure Act.

In a meeting on May 16, 2015, the City Council voted to approve Alternative B as the locally preferred alternative. In the staff presentation before the vote, the FTA grant was noted as a potential funding source that the City was not dependent upon for construction of the station. According to staff, the FTA grant was not even considered in the City's financial projections, which show that Alternative B will result in approximately $1.5 billion in net revenue over forty years. As stated by the staff report, without FTA funding, by "the end of that period, the development in Potomac Yard will be producing approximately $98 million of revenue every year beyond what is needed to pay for the station and City services for the residents and businesses in Potomac Yard. This means redevelopment of Potomac Yard will be producing $98 million every year that can be used to pay for services and amenities throughout the City". Thus, it is no longer suspected that the City would construct the metro station if FTA selected the no action alternative. At this point, it is clear beyond all doubt the City would construct under no action.

The same has always been true if NPS selected the no action alternative. The NPS's proposed action is to approve the City's request to use portions of the GW Parkway to construct and operate Alternative B. If NPS did not approve the Parkway construction, the City would simply construct the station at another alternative location.

So in both cases, no Federal action means the station would be constructed and the DEIS needs to be supplemented with the correct description of the no action alternative impacts.

Equally important and the subject of this letter is, because the station would be constructed the DEIS's project purpose, "to improve local and regional transit accessibility", would be met through the Federal no action alternative. Because the stated purpose does not include providing the City with a quicker return on its investment and a financial windfall, and because the project purpose would be met in the case of no Federal action, approval of the grant or right of way by FTA and NPS would be the essence of arbitrary or capricious or abuse of discretion in direct violation of the Administrative Procedure Act.

Respectfully,

Kurt Flynn

cc:
Peter May, Tammy Stidham, Alexcy Romero - NPS
Melissa Barlow, Lucy Garliauskas - FTA

Kurt Flynn (261)

See copy of comment attachment starting on following page

May 16, 2015

Kurt Flynn
Much Concerned Citizen &
NEPA Practitioner, Retired

Midway, GA 31320

Dear Federal Transit Administration and National Park Service,

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 is 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.

Please email if you would like to discuss my comments.

Respectfully,

Kurt Flynn

POTOMAC YARD METRORAIL STATION
Draft Environmental Impact Statement
Comments and Questions

PROPOSED ACTION

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 <u>proposed</u> 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.

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.

3. Please provide a copy of the application submitted for FTA's proposed action.

4. If application for FTA action has not been submitted, please describe why FTA determined the DEIS was necessary.

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.

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.

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.

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.

9. Please describe the Corps' NEPA compliance process for the proposed approval of the 404 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.

11. Please describe the Washington Metropolitan Area Transit Authority (WMTA) and describe its role in the proposed project.

12. Please confirm no other Federal agency besides FTA, NPS, and the Corps action will be required to approve this project.

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.

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.

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.

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.

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.

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.

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).

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.

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.

23. Please describe why the DEIS did not include mitigation for the impacts to these areas and provide the required mitigation.

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.

25. Please provide all correspondence between NPS, FTA, and the City regarding the use of Alternative B as a reasonable alternative.

26. Please describe NPS's planned NEPA compliance for the proposed project, including whether NPS plans to adopt the FTA EIS.

27. Please provide notification of public hearings or updates regarding future NPS actions.

INDIRECT & CUMULATIVE IMPACTS

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.

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.

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.

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.

NO ACTION ALTERNATIVE

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.

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 <u>if</u> 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, <u>there could be impacts</u> from the other improvements assumed <u>under this alternative</u>. 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.

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.

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.

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 exiting 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.

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.

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.

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.

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.

Comment ID 260

First Name Kurt

Last Name Flynn

Organization

Collection Method

Email

Commenter Type

Individual

Comment

July 12, 2015

Kurt Flynn
Midway GA, 31320

Bob Vogel,
Regional Director
National Park Service

Melissa Barlow,
DEIS Project Manager
Federal Transit Administration

Dear Mr. Vogel and Ms. Bartlow,

On May 16, 2015 I submitted the attached comments on the Federal Transit Administration and National Park Service's Potomac Yard Metro Station Draft Environmental Impact Statement (DEIS).

While I look forward to your response to the comments, I would like to now take the opportunity to reiterate the need to supplement the DEIS because of the incorrect no action alternative. Specifically, the no action alternative, called the 'no build alternative, is describe as no station would be built. However, there is no doubt that if either or both FTA or NPS took no action, the City would construct the station anyway. This means that the DEIS's description of impacts of the no action alternative is completely wrong and the comparison of impacts between the no action and action alternatives, cited by CEQ as the "heart of the NEPA" is also completely wrong.

This is a serious blow to the NEPA compliance for both agencies and an FTA or NPS ROD based on the existing DEIS would be an arbitrary and capricious action.

Please do not hesitate to contact me if you would like to discuss further.

Sincerely,
Kurt Flynn

cc:
Peter May, NPS; Tammy Stidham, NPS; Alexcy Romero, NPS

Kurt Flynn (260)

See copy of comment attachment starting on following page

May 16, 2015

Kurt Flynn
Much Concerned Citizen &
NEPA Practitioner, Retired

Midway, GA 31320

Dear Federal Transit Administration and National Park Service,

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 is 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.

Please email if you would like to discuss my comments.

Respectfully,

Kurt Flynn

POTOMAC YARD METRORAIL STATION
Draft Environmental Impact Statement
Comments and Questions

PROPOSED ACTION

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 <u>proposed</u> 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.

41. Please describe FTA's proposed action.

42. 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.

43. Please provide a copy of the application submitted for FTA's proposed action.

44. If application for FTA action has not been submitted, please describe why FTA determined the DEIS was necessary.

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.

45. Please indicate if FTA and NPS would determine the preferred alternative.

On page 3-178, the DEIS indicates the City would need to comply with the Coastal Zone Management Act (CZMA).

46. Please indicate if FTA would be responsible for CZMA compliance and, if so, provide the status of FTA's compliance.

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.

47. Please describe each NPS proposed action for this project, including the status of each action.

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.

48. 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.

49. Please describe the Corps' NEPA compliance process for the proposed approval of the 404 permit.

50. 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.

51. Please describe the Washington Metropolitan Area Transit Authority (WMTA) and describe its role in the proposed project.

52. Please confirm no other Federal agency besides FTA, NPS, and the Corps action will be required to approve this project.

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.

53. Please describe the project's planned review and approval process for the various Federal agencies.

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.

54. Please indicate if FTA and NPS concur with the DEIS project purpose. If not, provide the FTA and NPS purpose.

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.

55. Please describe if, and if so how, the FTA and NPS participated in the screening process to develop the reasonable alternatives.

56. 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.

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

57. Please describe why additional parking is not included as part of each action alternative.

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.

58. Please describe why FTA did not directly retain the EIS contractor.

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.

59. 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).

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.

60. Please describe why the FTA and NPS included Alternative B as a reasonable alternative, despite NPS objections.

61. Please describe why the DEIS did not discuss NPS's objections.

62. Please describe why NPS's objections to Alternative B were only included in an appendix.

63. Please describe why the DEIS did not include mitigation for the impacts to these areas and provide the required mitigation.

64. 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.

65. Please provide all correspondence between NPS, FTA, and the City regarding the use of Alternative B as a reasonable alternative.

66. Please describe NPS's planned NEPA compliance for the proposed project, including whether NPS plans to adopt the FTA EIS.

67. Please provide notification of public hearings or updates regarding future NPS actions.

INDIRECT & CUMULATIVE IMPACTS

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.

68. For each action alternative, please describe the development that would be induced and describe how FTA reached this determination.

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.

69. 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.

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.

70. 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.

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.

71. Please describe the affected environment for traffic and provide a meaningful description of the direct, indirect, and cumulative impacts of the project on traffic.

NO ACTION ALTERNATIVE

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

72. Please confirm the amount of development that would occur under the no action alternative.

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 <u>if</u> 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, <u>there could be impacts</u> from the other improvements assumed <u>under this alternative</u>. 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.

73. Please ensure the correct actions are included in description of the no action alternative, including the development.

74. 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.

75. 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.

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 exiting 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.

76. Please describe the basis used by FTA to develop the DEIS'S no action alternative.

77. 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.

78. 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.

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".

79. If the purpose of the project would be met without FTA funding, please describe why FTA would proposed the action to fund the station.

80. 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.

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.

Comment ID 259

First Name Gavin

Last Name Lutz

Organization

Collection Method

Email

Commenter Type

Individual

Comment

Greetings,

I'm a local resident. I know this is the EIS team but perhaps you can answer the one question I surprisingly can't find the answer to. When is the Potomac Yard Metro Station planned to be completed and operational? 2017? 2018? 2019? Thanks.

Gavin

Comment ID 262

First Name Lindy

Last Name Nelson

Organization U.S. Department of the Interior

Collection Method

Email

Commenter Type

Federal Government

Comment

May 14, 2015

9043.1
ER 15/0216

Melissa Barlow
Federal Transit Administration
1990 K Street NW, Suite 510
Washington, DC 20006-1178

Dear Ms. Barlow:

The Department of the Interior (Department) has reviewed the Potomac Yard Metrorail Station Draft Environmental Impact Statement (DEIS) and draft Section 4(f) Evaluation and submits the following comments in accordance with provisions of the National Transportation Act of 1966, as amended 23 U.S.C. 138 and 49 U.S.C. 303, referred to as Section 4(f), and the applicable regulations at 23 C.F.R. 774, and other regulations and guidance.

The Department understands that the Federal Transit Administration (FTA) and the City of Alexandria (COA), in cooperation with the Washington Metropolitan Area Transit Authority (WMATA) and the National Park Service (NPS) has released the DEIS and draft Section 4(f) for the proposed Potomac Yard Metrorail Station. The Project includes a new Metrorail station along the existing Metrorail Blue and Yellow Lines between the Ronald Reagan Washington National Airport Metrorail Station and the Braddock Road Metrorail Station, associated track improvements, and pedestrian bridges at Potomac Yard within Alexandria, Virginia. The NPS is a cooperating agency because of the Project's potential to impact the natural and cultural resources of the George Washington Memorial Parkway (GWMP).

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 first section, called the Mount Vernon Memorial Highway (MVMH), authorized by legislation signed by President Calvin Coolidge on May 23, 1928, was completed in 1932 to commemorate the bicentennial of George Washington's birth on February 22, 1932. The MVMH, was listed on the National Register of Historic Places (NRHP) in 1981 under criterion B for its commemoration of George Washington and under criterion C for landscape architecture. The MVMH was designed and landscaped to maximize scenic, esthetic and commemorative qualities.

As the MVMH was being completed, President Herbert Hoover signed what became known as the Capper-Cramton Act (Public Law 71-284) on May 29, 1930. This Act authorized appropriations for the GWMP, which was "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 MVMH, and proposed the protection of the northern and southern shores of the Potomac. The GWMP was designated a National Park Unit in 1933. The GWMP was listed in the NRHP in 1995 under criterion B for its commemoration of George Washington and under criterion C for landscape architecture.

The Greens Scenic Area Easement (GSE) was acquired by the federal government in 2000 and was in keeping with the historic purpose of the GWMP as a presidential memorial and a national park. The GSE area serves to protect the values of the GWMP by preserving the natural vegetation, topography, habitat and features within the area. By providing a visual buffer from the Potomac Greens development, it allows those using the Parkway to enjoy the scenic and aesthetic qualities for which the Parkway is valued. In March 2015, the GSE was determined to be eligible for listing in the NRHP as a parcel of land which contributes to the historic scenic qualities of the MVMH.

As part of this DEIS and draft Section 4(f) screening process, 36 initial alternatives were evaluated and screened to select those that met the Project's purpose and need, were consistent with land use and development plans, and technically feasible. The DEIS and draft Section 4(f) analyzes three build alternatives, one design option, and a no-action alternative.

Build Alternative A: This alternative is located along the existing Metrorail tracks between the CSX Transportation (CSXT) railroad tracks and the north end of the Potomac Greens neighborhood, generally with the "Metrorail Reservation." This alternative would provide 24-hour pedestrian/bicycle access between Potomac Yard and Potomac Greens via one of its two pedestrian bridges. Two options for construction access and staging were analyzed: one option was from GWMP, Potomac Greens Drive and the Rail Park, with limited access from Potomac Yard and the other from Potomac Greens Drive and the Rail Park, with limited construction access from Potomac Yard.

Build Alternative B: This alternative is located between GWMP 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 GSE, administered by the NPS. This alternative would provide 24-hour pedestrian/bicycle access between Potomac Yard and Potomac Greens via one of its two pedestrian bridges. Two options for construction access and staging were analyzed: one option was from GWMP, Potomac Greens Drive and the Rail Park, with limited access from Potomac Yard and the other from Potomac Greens Drive and the Rail Park, with limited construction access from Potomac Yard.

B-CSX Design Option: This 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 GWMP property and the GSE. A separate pedestrian/bicycle bridge will provide 24-hour access between Potomac Yard and Potomac Greens. Construction access would be provided from the Rail Park and Potomac Yard.

Build Alternative D: This alternative 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. A separate pedestrian/bicycle bridge will provide 24-hour access between Potomac Yard and Potomac Greens. Construction access would be provided from GWMP, Potomac Greens Drive, the Rail Park and Potomac Yard.

Of the three build alternatives and one design option being considered, none was identified as being a preferred alternative in either the DEIS or draft Section 4(f). On April 27, 2015, the City of Alexandria announced that their staff recommendation for the locally preferred alternative to City Council was

Alternative B. The City Council is scheduled to vote on the locally preferred alternative on May 20, 2015, two days after the public comment period closes.

The Department recognizes that there will be impacts to GWMP, the degree of which depends on the alternative selected. Impacts to GWMP include the permanent transfer of NPS lands to WMATA, temporary construction impacts, and impacts that would result in a change in the features and attributes of GWMP. The proposed Build Alternatives B and D would require the permanent transfer of approximately .16 acre and 1.43 acres, respectively, from NPS to WMATA.

In addition, NPS land would be impacted by temporary construction activities that would span approximately two years. Build Alternative A, Option 1 would require .30 acres of land, .25 acre of the GSE and .35 acre of NPS-regulated wetlands. Option 2 would require .13 acre of the GSE and impact .01 acre of NPS-regulated wetlands. Build Alternative B, Option 1 would require .78 acres of land, 3.09 acre of the GSE and 3.68 acre of NPS-regulated wetlands. Option 2 would require .55 acres of land, 3.09 acres of the GSE and impact 3.57 acres of NPS-regulated wetlands. Build Alternative D would require 2.40 acres of land, .02 acre of the GSE and .48 acre of NPS-regulated wetlands. Activities in the affected areas would encompass staging areas, areas for grading and drainage, the resurfacing and reconstruction of the approach roadways, and areas for re-vegetation.

Construction access from GWMP is contemplated under Option 1 for Build Alternatives A and B and are being analyzed because of potential impacts to residential communities should GWMP not be used for access. Commercial vehicles are prohibited from GWMP, with limited exceptions, under NPS Management Policies 2006 (9.2.1.2.1) and Federal Regulations (36 CFR 5.6). Access from GWMP for Build Alternatives A and B would impact two archeological sites if avoidance measures are not possible. Build Alternative D would require construction access from two locations along the GWMP and would impact one archeological site. The Department supports previous statements by the NPS that, based on impact to resources, the NPS would not provide a permit for access from the GWMP for construction purposed.

The Department understands that more information is needed regarding the exact locations of construction staging areas for Build Alternatives A, B and D and expects that more detail regarding construction staging, including avoidance and mitigation strategies, will be included in the Final Environmental Impact Statement (FEIS). The Department expects that every effort will be made to avoid or minimize the use of GWMP and the GSE for construction staging.

Visual resources and archeological resources will be impacted under Build Alternatives A, B and D. The Department agrees with FTA's preliminary determination of an adverse effect for Build Alternatives A and B on viewsheds and the cultural landscape due to the vegetation removal. The Department agrees with FTA's preliminary determination of an adverse effect for construction access Option 1 for Alternatives A and B because of the impact on two archeological resources which may be eligible for listing in the NRHP. The Department agrees with FTA's preliminary determination of an adverse effect for Build Alternative D on viewsheds and the cultural landscape due to the vegetation removal, and because of adverse effect on one archeological resource which may be eligible for listing in the NRHP.

The Department has yet to determine whether it agrees with FTA's preliminary determination of an adverse effect for B-CSX Design Option. The FTA came to this preliminary determination because of the addition of non-historic elements that would impact the views from GWMP/ MVMH. However, the need for additional visual analysis to use a single source of renderings was identified in the DEIS and will be completed as part of the Final EIS. Once this additional analysis is added, the Department can determine whether it agrees with the final FTA determination.

A number of Section 4(f) resources administered by the NPS would be affected as a result of the proposal, including GWMP, MVMH, the GSE and three archeological sites. The Department understands that additional information is needed for Section 4(f) Evaluation determination of least overall harm analysis conclusion, and that will be presented in the FEIS. Therefore the Department defers concurrence until such time that adequate information for the analysis of least overall harm has been provided.

The FEIS and the final Section 4(f) should both include more detailed information regarding construction staging and visual analysis, using a single source of renderings. Appendix G in the DEIS does not reflect that the GSE was determined eligible as a contributing property for the NRHP in March 2015 and that should be reflected in the FEIS. In addition, there is a discrepancy in acres of the GSE easement between the DEIS and Appendix G which should be resolved in the FEIS. The Department is hopeful that there will be sufficient information in the FEIS to determine the full impact of this proposal on the GWMP.

Finally, the Department understands that FTA, COA, WMATA, and NPS have collaborated very closely throughout the entirety of this project, and is appreciative of how receptive the agencies have been to the input the NPS has provide in this process. For continued coordination with NPS, please contact Tammy Stidham, Chief of Planning, Compliance & GIS, National Capital Region. Ms. Stidham can be reached by phone at 202-619-7474 or email at tammy_stidham@nps.gov.

The Department appreciates the opportunity to provide these comments.

Sincerely,

Lindy Nelson
Regional Environmental Officer

cc:
City of Alexandria, 301 King St., Room 2300, Alexandria, VA
Potomac Yard, Metrorail Station EIS, P.O. Box 16531, Alexandria, VA 22302
WMATA, 600 Fifth Street, NW, Washington, DC 20001

Comment ID 215

First Name Kathryn

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Organization

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Commenter Type

Individual

Comment

Dear Peter:

I apologize for ducking on the Net Benefit Assessment issue. Here is my thinking, which comes from years of watching "offset" agreements being crafted internationally, mostly by extractive industries. Also, just fyi, my own background is private sector with an MBA in international business. This is augmented by twenty years in environmental issues, including three grants from the National Science Foundation.

What struck me about the Net Benefit Assessment as outlined in the NPS/Dept Int letter from Robert Vogel was the gross inequity between the "payout" to the public sector (NPS, etc) and that to the private sector. The only salient and relevant metric is square footage of land … 3.8 million square feet for the increased density from Alternative B and 7,000 square feet for NPS. This is the only metric that crosses over and functions as the base measure of any "trade". Without it there would be NO Alternative B.

The 3.88 million square feet will operate for at least 30 years in paying both the developer and the city. It is secured by a number of standard mechanisms that reduce risk of nonpayment and produce fairly predictable revenue streams (for 30+ years) for both the developer/owners and the city (taxes). On the other hand, the 7,000 square feet traded off come with no assurance that "improvements" will be made, but only that $12 million will be received as a one time payment … this pales in the face of the payback over a 30 year period for the developer and the city. There is high risk that any real and equitable long term return will not be made. The letter outlines a number of "Plans" will be done for "improvements". This is rather a classic way to delay an uncomfortable or costly payout. Even the mention of height limits etc are subject to the politics of the time … we all know how stable and predictable that is!

Finally, Daingerfield Island is in a FEMA designated floodplain with a new Executive Order coming out very shortly that will raise the base flood level by 2-3 feet. This makes any "improvement", short of a Dutch style solution, very costly and perhaps even undesirable. We all know the more filtration acres along the Potomac we have the better for water quality and in the case of Alexandria, for storm water management compliance. So what exactly would "improvements" consist of? Again, it seems the answer is low cost, "no build", naturalization. So Daingerfield Island "improvement" plans seem worth $12 million … but only if the island reverts to wetlands. In other words, just take the $12 million, but only as the least the tradeoff is worth.

It is important to tap into the 30 year payback revenue stream that this tradeoff is making possible without this tradeoff there would be NO gain of 3.8 million additional square feet of usage (density) for the life of the loan on this project. In other words, the REAL value of the 7,000 square feet of wetlands is the 30 year financial performance of the "bonus" density.

Be happy to talk more,
Kathryn

Comment ID 264

First Name Tucker

Last Name Smith

Organization U.S. Army Corps of Engineers-Norfolk District

Collection Method

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Reply to Attention of

DEPARTMENT OF THE ARMY
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May 19, 2015

Northern Virginia Regulatory Section
NAO 2012-02012 (Potomac River)

Ms. Melissa Barlow
Environmental Protection Specialist
Federal Transit Administration
1990 K Street NW, Suite 510
Washington, DC 20006-1178

Ms. Lee Farmer, AICP
Potomac Yard Projects Manager
City of Alexandria
301 King Street
Alexandria, VA 22314

Dear Ms. Barlow and Ms. Farmer:

This letter is in response to recent April 2015 Draft Environmental Impact Statement and Draft Section 4(f) Evaluation for the proposed Potomac Yard Metrorail station. The Washington Metropolitan Area Transit Authority (WMATA) is evaluating construction for the Potomac Yard Metrorail station adjacent to Mount Vernon Memorial Highway and George Washington Parkway in Alexandria, Virginia. In accordance with the National Environmental Policy Act (NEPA), an Environmental Impact Statement (EIS) is being prepared with the Federal Transit Administration (FTA) as the lead federal agency to include WMATA and the National Park Service serving as cooperating agencies. Comments are being solicited regarding the scope of the project.

On May 14, 2015, Regena Bronson of the Corps met with Mr. James Ashe to discuss the potential alternative for the proposed Metrorail station. As discussed, our regulations require that we consider a full

range of public interest factors and conduct an alternatives analysis in order to identify the least environmentally damaging practicable alternative (LEDPA), which is the only alternative we can authorize. Avoidance and minimization of impacts to aquatic resources will be an important consideration in our evaluation of the alternatives.

In addition, this project is subject to compliance with Section 106 of the National Historic Preservation Act of 1966.

According to 36 CFR 800.2(a)(2):
"…*If more than one Federal agency is involved in an undertaking, some or all [of] the agencies may designate a lead Federal agency, which shall identify the appropriate official to serve as the agency official who shall act on their behalf, fulfilling their collective responsibilities under section 106. Those Federal agencies that do not designate a lead Federal agency remain individually responsible for their compliance with this part*."

Pursuant to the above provision, the FTA (Virginia Division) is hereby designated as the lead federal agency to fulfill the collective Federal responsibilities under Section 106 for the following undertaking, which FTA has determined will have an adverse effect on historic resources:

Mount Vernon Memorial Highway and the George Washington Parkway in Alexandria, Virginia

The Corps authorizes FHWA to conduct Section 106 coordination on its behalf. Any Memorandum of Agreement prepared by FHWA under 36 CFR 800.6 should include the following clause in the introductory text:

"*WHEREAS, pursuant to Section 404 of the Clean Water Act, a Department of the Army permit will likely be required from the Corps of Engineers for this project, and the Corps has designated FTA as the lead federal agency to fulfill federal responsibilities under Section 106; and*

In addition, the Corps hereby authorizes FTA to conduct coordination on its behalf for the Potomac Yard Metrorail Station project in accordance with Section 7 of the Endangered Species Act.

Should you have any questions, you may contact Regena Bronson at 540-548-2838 or regena.d.bronson@usace.army.mil.

Sincerely,

Tucker Smith
Chief, Northern Virginia
Regulatory Section

Copies Furnished:
Virginia Department of Historic Resources, Richmond
National Park Service, McLean