

# M ORGANIZATIONS COMMENTS AND RESPONSES ON THE INITIAL EA

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The following six organizations submitted written comments on the initial Environmental Assessment published on October 9, 2013:

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|---------------------------------------------|------|
| Casey Trees .....                           | M-2  |
| Crestwood Citizens Association .....        | M-3  |
| Embassy of Italy .....                      | M-5  |
| Rock Creek Conservancy .....                | M-7  |
| Ward3Vision .....                           | M-12 |
| Washington Area Bicyclist Association ..... | M-16 |

Copies of their written submissions and the responses to their comments are documented herein.

November 22, 2013

Stephen Walter  
Vice President  
Attn: Broad Branch Road Environmental Assessment  
Parsons Transportation Group  
100 M Street, SE, Suite 1200  
Washington, DC 20003

Dear Mr. Walter:

Casey Trees is a Washington D.C.-based nonprofit, with a mission "to restore, enhance and protect the tree canopy of the Nation's capital." We appreciate the opportunity to provide comment to the District Department of Transportation, the Federal Highway Administration, and the National Park Service on the rehabilitation of Broad Branch Road.

Broad Branch Road abuts Rock Creek Park, a national and local treasure that provides space for recreation, habitat for wildlife, and critical stormwater management. Any efforts to rehabilitate the road should minimize disturbance to trees, which greatly contribute to Rock Creek's identity and use. Casey Trees recommends that DDOT rehabilitate Broad Branch Road in accordance with Alternative Two of the Environmental Assessment.

Alternative Two best meets the goals outlined in the Environmental Assessment. It significantly minimizes the use of National Park Service lands, requiring only 245 square feet of additional land acquisition and bests complements the natural landscape, requiring only 4300 feet of retaining wall. Lastly, it most effectively promotes environmental sustainability. More trees are available to capture and store stormwater and less impervious surfaces are created. In addition, Broad Branch Road is a low speed, local neighborhood road with scenic views of the park. Alternative Two best maintains the character of this road.

Casey Trees commends DDOT for its commitment to stormwater management by protecting trees during construction and implementing low impact development throughout all alternatives. However, these measures are insufficient. DDOT should also commit to removing the least amount of trees and Special Trees as possible. Under Alternative Two, only 240-285 trees need removal, whereas Alternatives Three and Four promote the removal of over 460 trees. We also suggest that DDOT plant three trees for every one tree removed that is not protected by the Urban Forest Preservation Act. By using this approach to replacement planting, DDOT can more quickly regain the erosion control benefits of trees and prolong future use of Broad Branch Road.

Thank you for your time and for the opportunity to comment. If you have any questions, please feel free to contact me. I may be reached at mhughes@caseytrees.org or 202.349.1893.

Maisie Hughes

Director, Planning & Design



3030 12th Street NE · W DC 20017  
202.833.4010 · f202.833.4092 · caseytrees.org

## Response to Maisie Hughes - Casey Trees

Thank you for your comments.

### Responses to comments:

1. Comment noted. The Preferred Alternative, Alternative 3 Modified, is the alternative with the least environmental impacts while meeting the requirements of the District of Columbia's Priority Sidewalk Assurance Act of 2010, which requires the installation of a sidewalk for reconstruction of roadways that are currently lacking sidewalks. Alternative 2 would not meet requirements of the Act throughout the project corridor. The Preferred Alternative also represents the minimal encroachment on Rock Creek Park lands (an estimated 235 square feet). These encroachments are linear slivers along the existing roadway that are generally less than 1 foot in width. Each of the seven encroachments has been reviewed in detail with the National Park Service and it has been determined that the encroachments will have no effect on the park's functions.

As indicated in Section 4.1.4 of the Revised Draft EA, tree removal will be limited to the maximum extent possible by minimizing the extent of cut and fill for the proposed improvements. All trees will be protected during construction or replaced according to DDOT's Standard Specifications for Highways and Structures – Section 608 Trees, Shrubs, Vines, and Ground Covers.

**CRESTWOOD COMMENTS IN SUPPORT OF ALTERNATIVE 2  
FOR THE REHABILITATION OF BROAD BRANCH ROAD**

On behalf of the Board of the Crestwood Citizens Association and as the Advisory Neighborhood Commissioner for single-member district ANC 4A08, we urge DDOT to adopt and expeditiously implement Alternative 2 as set forth in the District of Columbia Department of Transportation's (DDOT's) Environmental Assessment (EA) for the project to rehabilitate Broad Branch Road, N.W. We submit these comments for the record.

We regard Alternative 2 as the only feasible alternative for reasons cited below. We also believe that addressing the storm erosion and rehabilitating the road function in the quickest, most cost effective way, is in the best overall interest of DC. This balanced approach makes the most sense from a transportation, economic, social, and economic perspective. Crestwood is an adjacent community that is greatly affected by the poor condition of the road and the time involved in its repair.

In support of our position, we note that Broad Branch road is a public two-lane vehicular road that has served the community for decades. More specifically,

1. The current Broad Branch roadbed is crumbling and is dangerously close to collapse in places; the "Do Nothing" option is not viable. The chief engineer acknowledged at the recent open house that the stream has created holes under the roadbed, thereby risking the collapse of the road, and he acknowledged that routine repair and maintenance operations, including temporary reconstruction of the Soapstone culvert and bridge, have been inadequate to assure a viable, safe road for very long. The city has had the obligation to maintain the road and the city (DDOT) has not effectively maintained the road for safe operation. The road is already built, but it needs restoration. The Alternative 2 would best accomplish what should have been done all along.
2. We do not believe Alternative 4 is feasible. The city does not currently own the land necessary to expand the right of way to 47 feet from the existing 33 feet, and much of the additional land that would be needed is owned by foreign governments and used for diplomatic purposes. The sale or transfer of such land to the DC Government would need the approval of the several foreign government owners and the State Department. Should the foreign governments even consider the sale of their property, which seems unlikely, such negotiations would require a lengthy and bureaucratic approval process with each government which could take years to resolve, by which time the road could become impassible in places.
3. Furthermore, the incremental cost of Alternatives 3 and 4 (\$5.2 million 8.1 million, respectively) drastically understates the likely total project costs, which, the engineers acknowledged at the hearing on November 5, 2013, exclude the right-of-way acquisition costs and the design costs that would be necessary to effect these options, especially Alternative 4. Notwithstanding the desirability of having bike paths as called for by the Ward 3 ANC's, which we understand, we regard the incremental costs of these options over Alternative 2 to be excessive in relation to the benefits to be gained. The longer we wait to fix the road, the higher the cost and the greater the risks to the public.

**Response to Gail Black - Crestwood Citizens Association**

Thank you for your comments.

**Responses to comments:**

1. Comment noted. Rehabilitation of Broad Branch Road requires action beyond typical maintenance procedures, including regrading of the roadway and replacement of the existing drainage system with an improved stormwater management system. The Preferred Alternative, Alternative 3 Modified, would address storm water runoff erosion and rehabilitate the road, while meeting the requirements of the District of Columbia's Priority Sidewalk Assurance Act of 2010, which requires the installation of a sidewalk for reconstruction of roadways that are currently lacking sidewalks. Alternative 2 would not meet requirements of the Act throughout the project corridor. The total estimated project cost for Candidate Build Alternative 3 Modified is \$56.25 million (in 2018 dollars), more than the cost of Candidate Build Alternative 2 (\$37.4 million) and Alternative 3 (\$43.7 million) yet less than that of Alternative 4 (\$57.5 million). Similarly, the construction duration of the Preferred Alternative (i.e., 30 months) would be longer than Candidate Build Alternative 2 (24 months), yet shorter than Candidate Build Alternative 4 (36 months).
2. The Preferred Alternative, Alternative 3 Modified, will not require the acquisition of land owned by foreign governments.
3. The updated cost estimates for each of the Candidate Build Alternatives plus the Preferred Alternative are summarized in Appendix C. Due to the increased amount of infrastructure and associated right-of-way costs, Alternatives 3, 4 and the Preferred Alternative exceed that of Alternative 2. However Alternative 2 does not meet all of the prescribed elements of the project's purpose and need – most notably the absence of sidewalks as required under the District Sidewalk Law. .

4. Alternatives 3 and 4 would take more time. It would lengthen the time for the road to be out of commission for public use by those of us who need it (an incremental 6-12 months, respectively.) The construction times in the EA do not include remaining project decision time and the time that would be necessary to design the project itself (stated at the hearing to be an estimated year, at least.) Additionally, as noted in #2, above, the time estimates do not take into account the time that would be involved trying to acquire land currently owned by various embassies. The now crumbling road could become seriously dangerous.
5. All of the alternatives would impact the trees and would involve cutting out the bordering hillside. Alternatives 3 and 4, however, would involve the destruction of substantial numbers of trees (initially estimated at over 200-600 depending on the option), and will require the substantial carving out of the hillside bordering the west side of the road, and installation of extensive retaining walls, thus causing possible other environmental damage.

A safer Broad Branch road as soon as possible is critical for our public safety and quality of life for those of us who live east of the park. The road provides one of the two vehicular transportation corridors at our latitude across Rock Creek Park for all Crestwood and many other District of Columbia residents east of Rock Creek Park. Its closure for any length of time for construction would leave Crestwood residents relatively isolated, with only Tilden Street available to cross the park by car and would make access to the Van Ness metro and area retail establishments west of the Park onerous. It would also greatly increase the already overburdened Connecticut Avenue traffic between Van Ness and Albemarle Streets.

As the ANC Commissioner for the impacted single-member district and on behalf of the Board of the Crestwood Citizens Association, I therefore strongly urge that DDOT adopt Alternative 2 as described in the EA, proceed as expeditiously as possible to implement these recommended improvements in Broad Branch Road, N.W., in such a way as to minimize possible adverse effects that implementation may have on vehicular traffic in this corridor. This alternative best fulfills the city's legal requirements. Right now, legally, Broad Branch is a public road. Alternatives 3 and 4 propose to alter its function. The law says that alternative uses of the right of way must "be evaluated and decisions be made in the best overall public interest based upon a balanced consideration of the need for safe and efficient transportation, of the social, economic, and environmental impact of the proposed transportation improvement, and local environmental protections goals." (23 CFR 771.105b).

In addition, the Board of the Crestwood Citizens Association urges that DDOT, in proceeding with the long overdue rehabilitation of Broad Branch Road, N.W. take the opportunity to work with the National Park Service, WASA, PEPCO and the utility companies to repair the aging sewer lines and the underground power and utility lines, and to coordinate Broad Branch Road work with changes being made in the Soapstone tributary by WASA.

Gale Black  
Advisory Neighborhood Commissioner for single-member district 4A08 and  
President, Crestwood Citizens Association, on behalf of the Board.

4. As noted in Section 4.3.10 of the Revised Draft EA, maintenance of traffic plans included in Appendix E and further refined as part of the project's final design will provide detour arrangements during road closures. It is also recommended that reconstruction of the roadway occur in phases to minimize disruptions from road closures. The Preferred Alternative, Alternative 3 Modified, would not require acquisition of land owned by foreign countries.
5. The Preferred Alternative incorporates a reduced typical section and retaining walls to minimize encroachment on the west side of the roadway. The walls will be installed within DDOT-owned right-of-way and thus minimize the extent of grading and tree removal required on the adjacent sloped areas. Retaining walls on both sides of the roadway will be designed to be compatible with the roadway setting – see renderings presented in Figures 2-4, 2-5 and 2-6 of the Revised Draft EA. As indicated in Section 4.1.4 of the Revised Draft EA, tree removal will be limited to the maximum extent possible by minimizing the extent of cut and fill for the proposed improvements. All trees will be protected during construction or replaced according to DDOT's Standard Specifications for Highways and Structures – Section 608 Trees, Shrubs, Vines, and Ground Covers.
6. Comment noted. Please see response to comment #4 above concerning construction impacts on traffic.
7. Comment noted. Under the Preferred Alternative, Alternative 3 Modified, Broad Branch Road would continue to serve the function of a collector roadway and would provide sidewalks consistent with the District of Columbia's Priority Sidewalk Assurance Act. Please see response to comment #4 above regarding measures to minimize traffic impacts during construction of the proposed improvements.
8. DDOT will continue to coordinate with the National Park Service, DC Water, PEPCO and other utility companies during the project's design and construction phases. DDOT will continue to coordinate with DC Water to align utility replacement of decaying sewer lines along the project roadway and to verify that the new structure for Soapstone Creek Culvert would not conflict with repairs to or replacement of the existing sanitary sewer lines along Soapstone Creek.





Embassy of Italy  
3000 Whitehaven St. NW  
Washington, DC 20008

Washington, 27 November 2013  
Prot. 5455

*Dear Mr Wilson,*

the Embassy of Italy has learned that the District of Columbia authorities intend to widen that part of Broad Branch Road bordering on the property owned by the Republic of Italy. In fact, it would affect the perimeter of the land that is seat to the Residence of the Ambassador of Italy to the United States of American, Villa Firenze.

Considering the implications and the breadth of this action, as the owner of the tract of land affected by the potential broadening, I would be appreciative to receive the following information and documentation:

- the areas of the property owned by the Republic of Italy that would be affected by the enlargement and the tax parcels involved;
- copies of the technical and graphic reports on the proposal, with special reference to the areas of the property of the Republic of Italy involved;

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Wayne Wilson

District department of Transportation

55 M Street, SE, 4th Floor

Washington, DC 20003

## Response to Aldo Valeo - Embassy of Italy

Thank you for your comments.

### Responses to comments:

1. At the request of the Embassy of Italy, DDOT provided documentation to the Embassy on December 19, 2013 regarding potential impacts of the Candidate Build Alternatives on property owned by the Government of Italy at 2800 Albemarle Street, NW, known as La Villa Firenze. As indicated in Section 2.3.1 of the Revised Draft EA, the Preferred Alternative is a modified version of Candidate Build Alternative 3, in which the majority of widening of the roadway is proposed on the east side of the existing roadway to avoid any encroachment upon sovereign nation's properties, including La Villa Firenze.

- the consequences that broadening the street would have on the current metal fencing, electronic gates, and pedestrian access to the property and on the adjacent service building.

I look forward to hearing from you soon with respect to the foregoing.

Sincerely yours,

Aldo Valeo  
Head of the Administrative Office





## ROCK CREEK CONSERVANCY

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### Address

4825 Cordell Ave #200  
Bethesda, MD 20814  
(202) 237-8866  
rockcreekconservancy.org

### Mission

Protecting the lands and  
waters of Rock Creek and  
revitalizing Rock Creek  
Park for people to  
treasure and enjoy

Selected as one of  
Greater Washington's  
finest small charities



Catalogue for Philanthropy  
2011-2012

November 22, 2013

District Department of Transportation  
Attn: Wayne Wilson  
55 M Street, SE, 4<sup>th</sup> Floor  
Washington, DC 20003

Re: Comments of the Rock Creek Conservancy on Rehabilitation of Broad Branch  
Road Environmental Assessment

Dear Mr. Wilson:

The Rock Creek Conservancy (RCC) appreciates the opportunity to provide these comments regarding the Environmental Assessment for the Rehabilitation of Broad Branch Road, NW. RCC is a nonprofit organization working to protect the lands and waters of Rock Creek for people to treasure and enjoy.

**Background.** Broad Branch is a key tributary in the Rock Creek watershed. It comprises part of the western border of Rock Creek Park, which is administered by the National Park Service. Broad Branch is treasured by area residents as a scenic stream valley featuring cascades, pools, and rock outcrops as well as a thick tree canopy and abundant wildlife. Trees improve the area's air quality, they serve as a buffer against damaging stormwater, and their canopy helps to cool the waters of Broad Branch and Rock Creek.

Broad Branch Valley and Rock Creek Park are threatened by the deterioration of the existing roadway and stormwater management facilities as well as utility infrastructure such as sewers that are in dire need of replacement. Inadequate stormwater management leads to severe erosion which pollutes the water, degrades stream health, and damages critical infrastructure, including roads, bridges, and pipes. RCC commends DDOT and its consultants for thoughtful analysis of this challenging rehabilitation project and its possible environmental impacts, and for consideration of the needs of pedestrians and bicyclists to access Rock Creek Park in the vicinity of Broad Branch.

With regard to transportation, the Broad Branch valley contains only a narrow, winding, roadway that is poorly maintained and subject to flood hazards. Broad Branch Road is used primarily by motor vehicles. The narrow roadway

## Response to Christine Pieper - Rock Creek Conservancy

Thank you for your comments.

with poor sightlines is considered unsafe for pedestrians and bicycles, even though it includes a signed bicycle route. Residents of the adjacent Forest Hills neighborhood have no way to access the Park safely on foot. Furthermore, the Soapstone Valley Trail terminates on Broad Branch Road, leaving hikers nowhere to go but onto the narrow roadway.

**Principles.** The rehabilitation of Broad Branch Road represents a challenge to planners who seek to facilitate the needs of non-motorized transportation such as pedestrians and bicyclists, while protecting the sensitive natural resources of the scenic Broad Branch valley. With this challenge in mind, RCC offers the following principles to guide DDOT as it goes through its detailed design phase. These principles seek a balanced solution to the competing needs of environmental protection and public access between adjacent neighborhoods and Rock Creek Park:

- Protection of the sensitive natural resources of the Broad Branch Valley - particularly its trees - should be a top priority as DDOT moves forward with the rehabilitation project. Thus, *protection of trees should be a key design parameter for the project*. DDOT should strive to minimize tree loss/impacts in order to preserve the existing tree canopy to the extent feasible, thereby avoiding stream degradation due to increased stormwater runoff. Lost trees should be replaced, even though a newly planted tree is not an adequate substitute for a mature tree and all the benefits that it offers. 1
- DDOT should employ best practices regarding stormwater management. That includes protecting trees and minimizing impervious pavement, but also constructing facilities like rain gardens and catch basins. The project should seek to preserve the natural landscape, minimizing cut and fill to the extent possible. 2
- The rehabilitation project should enhance public access to Rock Creek Park from adjacent neighborhoods through facilities that provide for safe use of the Broad Branch Valley by pedestrians and bicyclists, consistent with the protection of natural resources in the Rock Creek watershed. 3
- Project design for the Broad Branch Road rehabilitation, when completed, should be available for public review. 4

**Recommendations.** Rock Creek Conservancy supports a number of the provisions and options found within DDOT Alternatives 2, 3, and 4. However, RCC does not endorse any alternative in its entirety.

- As an initial matter, RCC supports proposed rehabilitation of the roadway and stormwater management facilities that are included in all three action Alternatives. Repair and replacement of this deteriorating infrastructure is necessary for the long-term protection of natural resources in the Broad Branch valley as well as downstream in Rock Creek. RCC recognizes that significant tree impacts will occur under any of the action alternatives simply due to necessary infrastructure replacement and upgrades. We encourage DDOT to take all feasible measures to minimize tree impacts in order to preserve the existing tree canopy and protect Broad Branch. 5

### Responses to comments:

1. As indicated in Section 4.1.4 of the Revised Draft EA, tree removal would be limited to the maximum extent possible by minimizing the extent of cut and fill for the proposed improvements. All trees will be protected during construction or replaced according to DDOT's Standard Specifications for Highways and Structures – Section 608 Trees, Shrubs, Vines, and Ground Covers.
2. The Preferred Alternative, Alternative 3 Modified, minimizes the impact footprint of the proposed improvements while meeting the requirements of the District of Columbia's Priority Sidewalk Assurance Act of 2010. Design refinements to the Preferred Alternative would result in an approximately 3% reduction of additional impervious surface compared to the original Alternative 3 (82,786 square feet vs. 80,176 square feet). As discussed in Section 4.1.2 of the Revised Draft EA, the proposed stormwater sewer would include perforations that would allow for some of the stormwater to naturally infiltrate as it travels through the culverts. This type of system, combined with the proposed rain gardens, would improve upon existing conditions by compensating for some of the impervious surfaces and allowing for groundwater regeneration closer to historic volumes. In addition, water quality catch basins will be used, wherever feasible, to screen debris and filter sediment before discharging runoff to the existing outfalls.
3. The Preferred Alternative, Alternative 3 Modified, would enhance public access to Rock Creek Park from adjacent neighborhoods by providing a sidewalk throughout the project corridor. Alternative 3 Modified, is the alternative with the least environmental impacts while meeting the requirements of the District of Columbia's Priority Sidewalk Assurance Act of 2010. All of the Candidate Build Alternatives would potentially affect historic resources and parklands protected under Section 4(f). The Act requires the selection of the Least Overall Harm Alternative, which has been determined to be Alternative 3 Modified.



with poor sightlines is considered unsafe for pedestrians and bicycles, even though it includes a signed bicycle route. Residents of the adjacent Forest Hills neighborhood have no way to access the Park safely on foot. Furthermore, the Soapstone Valley Trail terminates on Broad Branch Road, leaving hikers nowhere to go but onto the narrow roadway.

**Principles.** The rehabilitation of Broad Branch Road represents a challenge to planners who seek to facilitate the needs of non-motorized transportation such as pedestrians and bicyclists, while protecting the sensitive natural resources of the scenic Broad Branch valley. With this challenge in mind, RCC offers the following principles to guide DDOT as it goes through its detailed design phase. These principles seek a balanced solution to the competing needs of environmental protection and public access between adjacent neighborhoods and Rock Creek Park:

- Protection of the sensitive natural resources of the Broad Branch Valley - particularly its trees - should be a top priority as DDOT moves forward with the rehabilitation project. Thus, *protection of trees should be a key design parameter for the project*. DDOT should strive to minimize tree loss/impacts in order to preserve the existing tree canopy to the extent feasible, thereby avoiding stream degradation due to increased stormwater runoff. Lost trees should be replaced, even though a newly planted tree is not an adequate substitute for a mature tree and all the benefits that it offers. 1
- DDOT should employ best practices regarding stormwater management. That includes protecting trees and minimizing impervious pavement, but also constructing facilities like rain gardens and catch basins. The project should seek to preserve the natural landscape, minimizing cut and fill to the extent possible. 2
- The rehabilitation project should enhance public access to Rock Creek Park from adjacent neighborhoods through facilities that provide for safe use of the Broad Branch Valley by pedestrians and bicyclists, consistent with the protection of natural resources in the Rock Creek watershed. 3
- Project design for the Broad Branch Road rehabilitation, when completed, should be available for public review. 4

**Recommendations.** Rock Creek Conservancy supports a number of the provisions and options found within DDOT Alternatives 2, 3, and 4. However, RCC does not endorse any alternative in its entirety.

- As an initial matter, RCC supports proposed rehabilitation of the roadway and stormwater management facilities that are included in all three action Alternatives. Repair and replacement of this deteriorating infrastructure is necessary for the long-term protection of natural resources in the Broad Branch valley as well as downstream in Rock Creek. RCC recognizes that significant tree impacts will occur under any of the action alternatives simply due to necessary infrastructure replacement and upgrades. We encourage DDOT to take all feasible measures to minimize tree impacts in order to preserve the existing tree canopy and protect Broad Branch. 5

(responses continued)

Based on comments received on the EA and subsequent coordination efforts with the affected Sovereign Nations, US State Department, and the National Park Service, Alternative 3 was modified to create the Preferred Alternative. Alternative 3 Modified avoids encroachments upon sovereign nation's properties located on the west side of Broad Branch Road. While Alternative 3 Modified would require right-of-way acquisition within Rock Creek Park, the parcels of right-of-way to be acquired are generally less than 1 foot in width and would not alter the function or use of the affected park property. The potential encroachments have been reviewed with the National Park Service (see Section 4.12 of the Revised Draft EA for a more detailed description of the potential impacts to this Section 4(f) resource). In addition, Alternative 3 Modified would have fewer potentially impacts to historic resources, trees, and streams than Candidate Build Alternatives 3 and 4.

For the reasons cited above and within the Revised Draft EA, a dedicated bicycle lane as presented in Candidate Alternative 4 would require an additional 4 feet of paved surface for the length of the proposed roadway corridor. Although there is sufficient DDOT-owned right-of-way along Broad Branch Road north of 27th Street to accommodate the bicycle lane, this is not the case to the south. The widening to accommodate the bicycle lane would require additional acquisition of properties from Rock Creek Park and was not an acceptable proposal to the National Park Service. Although it does not provide a dedicated bicycle lane, Alternative 3 Modified would improve bicyclist safety along Broad Branch Road by improving sight lines, horizontal curves, and stormwater drainage.

4. DDOT will continue to coordinate with community stakeholders as needed during project design to continue efforts to avoid and/or minimize impacts to the community and sensitive environmental resources.
5. Please see response to comment #1 for information regarding measures to minimize tree impacts.

- RCC supports the stormwater infiltration measures such as rain gardens and catch basins in alternatives 2, 3, and 4, as well as the reconfiguration of the intersection with Brandywine Street (Option C).
  - RCC fully supports a one-way bike lane on the uphill east side of Broad Branch Road, which should significantly improve safety for bicyclists that move slowly uphill on the narrow, winding roadway, while also improving the flow of motor vehicle traffic. The gradual slope of Broad Branch Road makes it an ideal cycling route between Rock Creek and neighborhoods to the west, thereby materially enhancing the network of bicycle routes in the Washington, DC area. To control traffic speed on roadway, DDOT should employ traffic calming measures such as raised crosswalks at intersections and trailheads. Furthermore, to enhance the safety of bicyclists, DDOT might consider traffic separation measures for the bike lane such as “zebra humps” that are currently employed on Pennsylvania Ave, NW.
  - RCC supports a pedestrian path/sidewalk along the west side of Broad Branch Road, subject to the following conditions designed to protect the natural resources of the valley:
    - Protection of trees should be a paramount consideration in the design of the sidewalk.
    - DDOT should be flexible about the width of the sidewalk in order to minimize tree impacts and disruption to the existing topography.
    - Only pervious materials should be used for the surface of path/sidewalk – no impervious pavement.
    - Actual tree impacts attributable to incremental portions of pedestrian sidewalk should be assessed during the design phase.
- Furthermore, RCC recommends that DDOT consider limiting the pedestrian path/sidewalk to the section below Brandywine Street as a means of minimizing tree impacts while providing pedestrian access to Rock Creek Park via the Forest Hills neighborhood. If DDOT finds that tree impacts can be significantly reduced by a shorter sidewalk without unduly sacrificing pedestrian safety and park access, RCC would recommend that the path terminate at Brandywine Street.
- The Broad Branch valley is currently awash in neglected infrastructure. Besides the deteriorating roadway and culverts, there are broken stone walls, dangling cables and ancient sewer pipes perilously close to the stream. Not only should the reconstruction project include repair/upgrade of neglected infrastructure, but DDOT should also pursue a long-term plan in conjunction with NPS and the utilities to ensure that any infrastructure in the Broad Branch valley is properly maintained going forward.

**Conclusion.** Rock Creek Conservancy’s comments herein seek to balance need for protecting the resources of Broad Branch valley with public access to Rock Creek Park from adjacent trails and neighborhoods. RCC’s recommendations are consistent with widespread public opinion expressed at November 5 DDOT hearing about providing for safe public access to the Park from adjacent neighborhoods as well as the need to protect trees and the scenic beauty of the Broad Branch valley. We appreciate DDOT’s consideration of RCC’s comments.

6. Comment noted.
7. Please see response to comment #3 regarding the Preferred Alternative, improvements for bicyclist safety, and the requirement to select the Least Overall Harm Alternative.
8. The width of the proposed sidewalk has been reduced to from 6 to 5 feet under the Preferred Alternative, Alternative 3 Modified, in order to minimize right-of-way impacts along the west side of Broad Branch Road. Please see response to comment #1 for information regarding measures to minimize tree impacts. As noted above, installation of a sidewalk if required for reconstruction of roadways under the District of Columbia’s Priority Sidewalk Assurance Act of 2010. The proposed sidewalk is the minimum width that meets Americans with Disabilities Act (ADA) Standards. DDOT will consider the use of alternative pavement types, such as impervious pavements, in the project’s final design phase. All materials will be subject to DDOT’s standards and specifications.
9. The proposed improvements to the roadway include repair and restoration of other aging and deteriorated infrastructure including drainage facilities, retaining walls and utilities (in coordination with appropriate utility companies). DDOT will also continue to coordinate these improvements with the National Park Service with regards to Rock Creek Park.

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Should you have any questions about RCC's comments, please contact Mr. Alex Sanders at the RCC office: [asanders@rockcreekconservancy.org](mailto:asanders@rockcreekconservancy.org); (202) 237-8866.

Sincerely,



Christine Pieper  
President

Cc: Tara Morrison, Superintendent, Rock Creek Park



District Department of Transportation  
ATTN: Wayne Wilson  
1100 4<sup>th</sup> Street, S.W.  
Washington, DC 20024

Re: Comments on Rehabilitation of Broad Branch Road, N.W. Environmental Assessment

Dear Mr. Wilson:

Ward 3 Vision is a group of citizens who support the City's efforts to create a more livable Ward 3 that supports establishing a network of multi-modal travel options. We support DDOT adopting Alternative 4 as consistent with the Mayor's recently published "A Vision for a Sustainable DC" that promises District residents that the City will, in the short-term, "Improve bicycle and pedestrian connectivity through a citywide network of 80 miles of bike lanes, prioritizing east of the Anacostia River, and completing the Metropolitan Branch Trail." Recently, in public statements, the Mayor has expanded this vision and has spoken of up 100 miles of bike lanes being established, perhaps in anticipation of the results of the MoveDC initiative, whose draft version seeks even further use of bike lanes, bike boulevards and separated bicycle tracks.

Our main focus in this comment is to reinforce the great need to connect the east and west side of Rock Creek Park in the District for cyclists to access the Rock Creek Park system of bike paths and to connect employment centers like Friendship Heights and Bethesda to neighborhoods east of the park as well as future employment centers east of the park at the soon to be redeveloped Walter Reed Medical Center, while also creating safe pedestrian access from Chevy Chase DC.

The current configuration forces pedestrians and those who are not expert cyclists to use a car to be able to enjoy the park for recreation and even those who drive often cannot find parking in the few lots located within the park and there is no public transit access to the northern part of the park. Perhaps more importantly, Broad Branch Road is the missing link in a cycling commuter route through Rock Creek Park linking to Chevy Chase, DC and beyond, which would help immensely in reducing car traffic both through the park and on the bordering surface streets. DDOT has recognized these needs, and has appropriately included pedestrians and bicyclists in its evaluation of options.

The following provides our brief assessment of the 4 alternatives presented in the EA:

1. **Alternative 1 – Do Nothing:** We agree with the EA assessment that the "no action" baseline does not meet the project objectives and is not a viable choice. We are convinced a "rebuild" action must take place to improve the Road to assure minimal safety and environmental preservation.
2. **Alternative 2 – Rebuild Road Only:** While this alternative meets minimal requirements, and will solve the need for a rebuilt road, we believe that its omission of any alternative transportation solution conflicts directly with the vision the Mayor has established for the City, and flies in the face of Federal

## Response to Steve Seelig - ward3vision

Thank you for your comments.

### Responses to comments:

1. Comment noted. The Preferred Alternative, Alternative 3 Modified, is the alternative with the least environmental impacts while meeting the requirements of the District of Columbia's Priority Sidewalk Assurance Act of 2010. All of the Candidate Build Alternatives would potentially affect historic resources and parklands protected under Section 4(f) of the U.S. Department of Transportation Act of 1966. The Act requires the selection of the Least Overall Harm Alternative, which has been determined to be Alternative 3 Modified.

Based on comments received on the EA and subsequent coordination efforts with the affected Sovereign Nations, US State Department, and the National Park Service, Alternative 3 was modified to create the Preferred Alternative. Alternative 3 Modified avoids encroachments upon sovereign nation properties located on the west side of Broad Branch Road. While Alternative 3 Modified would require more right-of-way acquisition within Rock Creek Park than the original Candidate Build Alternative 3, the parcels of right-of-way to be acquired are generally less than 1 foot in width and would not alter the function or use of the affected park property (see Section 4.12 of the Revised Draft EA for a more detailed description of the potential impacts to this Section 4(f) resource). In addition, Alternative 3 Modified would have fewer potential impacts to historic resources, trees, and streams than Candidate Build Alternatives 3 and 4.





District Department of Transportation  
ATTN: Wayne Wilson  
1100 4<sup>th</sup> Street, S.W.  
Washington, DC 20024

Re: Comments on Rehabilitation of Broad Branch Road, N.W. Environmental Assessment

Dear Mr. Wilson:

Ward 3 Vision is a group of citizens who support the City's efforts to create a more livable Ward 3 that supports establishing a network of multi-modal travel options. We support DDOT adopting Alternative 4 as consistent with the Mayor's recently published "A Vision for a Sustainable DC" that promises District residents that the City will, in the short-term, "Improve bicycle and pedestrian connectivity through a citywide network of 80 miles of bike lanes, prioritizing east of the Anacostia River, and completing the Metropolitan Branch Trail." Recently, in public statements, the Mayor has expanded this vision and has spoken of up 100 miles of bike lanes being established, perhaps in anticipation of the results of the MoveDC initiative, whose draft version seeks even further use of bike lanes, bike boulevards and separated bicycle tracks.

Our main focus in this comment is to reinforce the great need to connect the east and west side of Rock Creek Park in the District for cyclists to access the Rock Creek Park system of bike paths and to connect employment centers like Friendship Heights and Bethesda to neighborhoods east of the park as well as future employment centers east of the park at the soon to be redeveloped Walter Reed Medical Center, while also creating safe pedestrian access from Chevy Chase DC.

The current configuration forces pedestrians and those who are not expert cyclists to use a car to be able to enjoy the park for recreation and even those who drive often cannot find parking in the few lots located within the park and there is no public transit access to the northern part of the park. Perhaps more importantly, Broad Branch Road is the missing link in a cycling commuter route through Rock Creek Park linking to Chevy Chase, DC and beyond, which would help immensely in reducing car traffic both through the park and on the bordering surface streets. DDOT has recognized these needs, and has appropriately included pedestrians and bicyclists in its evaluation of options.

The following provides our brief assessment of the 4 alternatives presented in the EA:

- Alternative 1 – Do Nothing:** We agree with the EA assessment that the "no action" baseline does not meet the project objectives and is not a viable choice. We are convinced a "rebuild" action must take place to improve the Road to assure minimal safety and environmental preservation.
- Alternative 2 – Rebuild Road Only:** While this alternative meets minimal requirements, and will solve the need for a rebuilt road, we believe that its omission of any alternative transportation solution conflicts directly with the vision the Mayor has established for the City, and flies in the face of Federal

(responses continued)

For the reasons cited above and within the Revised Draft EA, a dedicated bicycle lane as presented in Candidate Alternative 4 would require an additional 4 feet of paved surface for the length of the proposed roadway corridor. Although there is sufficient DDOT-owned right-of-way along Broad Branch Road north of 27th Street to accommodate the bicycle lane, this is not the case to the south. The widening to accommodate the bicycle lane would require additional acquisition of properties from Rock Creek Park and was not an acceptable proposal to the National Park Service. Although it does not provide a dedicated bicycle lane, Alternative 3 Modified would improve bicyclist safety along Broad Branch Road by improving sight lines, horizontal curves, and stormwater drainage.

- Comment noted.
- Comment noted. Please see response to comment #1 regarding selection of Alternative 3 Modified as the Preferred Alternative.

guidelines that would mandate at least an ADA accessible sidewalk along the road's length. Ironically, if the National Park boundaries had been to the west of the roadway, this alternative would not even be viable. It is notable that this alternative will have, as will all viable alternatives, a significant impact on trees, affecting about 285 trees with a diameter greater than four inches. Each of the rebuild alternatives, however, are forecast to cause a net savings of trees by eliminating those in danger of falling due to erosion from uncontrolled storm water. This build alternative would cost \$29.0 million.

3. **Alternative 3 – Rebuild Road with Sidewalk:** The EA notes that this alternative that includes a 6-foot sidewalk conforms both to District's Complete Street's Initiative (a policy document that encourages the provision of sidewalks along DC streets) and to the District of Columbia's Priority Sidewalk Assurance Act of 2010 (Law #L18-0227), effective September 24, 2010, that requires installation of sidewalks "to ensure a safe and accessible environment for pedestrians and persons with disabilities," for roadways undergoing reconstruction. We agree that this alternative is the minimum mandated under DC law, and wonder why this fact is not mentioned in the EA. Thus, we believe this is the minimum Alternative we believe DDOT can consider as it determines the rebuild alternative it will choose.

Although DDOT may disagree with our assessment that any rebuild alternatives are a "reconstruction," the Sidewalk Assurance Act of 2010 continues to state that, for "roadways that are missing sidewalks, but are not undergoing major construction, sidewalk installation shall be prioritized for the following areas: (1) Missing sidewalks in school areas; (2) Routes that provide access to parks and recreational facilities; (3) Transit stops; (4) Locations where the absence of a sidewalk creates substantial pedestrian safety risks; and (5) Roadway segments for which residents petitioned to have sidewalks." We think it is incontrovertible that this road meets (2) above, and will require the building of a sidewalk. It is also important to reiterate that there are no alternative streets in this area providing sidewalk access to Rock Creek Park so this sidewalk is not merely providing access along a single road – it is creating access for an entire community.

We were heartened to understand that although DDOT has determined this alternative would impact about 177 additional trees above those that will be impacted by Alternative 2, it concluded this alternative would rate equally with the others in total impact. We would not that in the absence of a bike lane, having only a sidewalk will create new conflicts between bikes and pedestrians, making this Alternative sub-optimal when Alternative 4 would yield a much safer result. The total estimated project cost for Alternative 3 is \$34.2 million

4. **Alternative 4 – Rebuild Road with Sidewalk and Bike Climbing Lane:** The current road is not at all safe for bicyclists on the Road. Sight lines are too short, and cars trying to pass bikes run a high risk of accident, both for cars and bikes. Despite claims that bicyclists have alternatives to Broad Branch, including Ridge Road, because of length and hills, these alternatives are not used by cyclists and bike commuters, which means that the park is simply not used by the majority of this group.

Similarly, claims that this alternative will create more car traffic congestion are unfounded. In fact, the opposite is true. The current configuration causes uphill traffic to queue up behind much slower

4. Comment noted. Please see response to comment #1 regarding selection of Alternative 3 Modified as the Preferred Alternative.
5. Comment noted. Please see response to comment #1 regarding selection of Alternative 3 Modified as the Preferred Alternative.

moving bicycle traffic, so that impatient car drivers often pass bikes recklessly (often running them off the road) and/or swerve into oncoming traffic and creating the risk of a head-on collision.

Importantly, *Alternative 4 has no greater impact on trees than Alternative 3*. Thus, there can be no reasonable argument against adopting Alternative 4 based on its impact on the trees adjacent to the road. The costs of this option are somewhat greater, and the construction duration is longer, but because the sidewalk alternative alone is likely to cause many more pedestrian/cyclist accidents; we believe this alternative is the safest for the most users. We are unable to properly assess the sub-options for this Alternative, but it looks to us that all three are desirable. The total estimated project cost for Alternative 4 is \$37.1 million.

We would note that each of the three affected Advisory Neighborhood Commissions support this Alternative 4. ANC 3/4G and 3E explicitly support Alternative 4, while ANC 3F also passed a resolution to support the alternative that promotes cycling and pedestrian access to the park.

We would remind DDOT that it is about to install the City's first Neighborhood Bike Boulevard on Jenifer Street NW between Friendship Heights and the intersection of Nebraska and Jenifer Street which will terminate about 800 feet from the proposed end of the Broad Branch road rebuild at Linnean Street. Across the line in Montgomery County plans have recently been finalized to add a multi-use trail to the eastern side of Wisconsin Avenue between Friendship Heights and Bethesda which will be able to accommodate cyclists.

These two pieces of bicycle infrastructure combined with alternative 4 will create a connected system of on-street bicycle infrastructure between downtown Bethesda and the Georgetown Branch of the Capital Crescent Trail to Friendship Heights, Chevy Chase and down to Rock Creek Park and all of the points to the south such as Mt. Pleasant, Adams Morgan, Cleveland and Woodley Parks, the West End, Georgetown, the National Mall and Northern Virginia.

We also believe it is critically important that new roadway construction include safe accommodations for pedestrians and the current condition of Broad Branch Road provides no pedestrian access from Chevy Chase to Rock Creek Park.

For the reasons cited above, Ward 3 Vision supports Alternative 4 and urges DDOT to commence construction as soon as it can to install this vital piece of infrastructure.

Sincerely,



Steve Seelig,  
On Behalf of Ward 3 Vision

6. Comment noted. Please see response to comment #1 regarding selection of Alternative 3 Modified as the Preferred Alternative.
7. Comment noted. Please see response to comment #1 regarding selection of Alternative 3 Modified as the Preferred Alternative.
8. The Preferred Alternative would provide a sidewalk consistent with Americans with Disabilities Act standards throughout the project corridor, improving pedestrian access to Rock Creek Park.
9. Comment noted.





WASHINGTON AREA BICYCLIST ASSOCIATION

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P: 202.518.0524 F: 202.518.0936  
WWW.WABA.ORG

Wayne Wilson  
District Department of Transportation  
55 M Street, SE, 4th Floor  
Washington, DC 20003

November 22, 2013  
RE: Broad Branch Road Environmental Assessment

Mr. Wilson:

Thank you and DDOT for the opportunity to provide comments on behalf of WABA's regional members and supporters. We have reviewed the Broad Branch Environmental Assessment and the Washington Area Bicyclist Association support for Build Alternative 4 as it best addresses the needs of all road users. Access to Rock Creek Park should be ensured to pedestrians, drivers and bicyclists on Broad Branch Road.

The District's Sustainable DC plan calls for 75 percent of all trips made by DC residents to be non-automobile in the next 20 years. Trips by foot, bike or transit will be encouraged. Alternative 4 is the only option which achieves that goal by providing dedicated space for all modes. The inclusion of bike lanes, sidewalk and general travel lanes will allow and encourage residents to choose the best mode of transportation for their trip. The failure to provide accommodations for bicyclists and pedestrians limits the ability of residents to choose the best mode for a given trip.

Alternative 4 also best represents a street design in line with the District Department of Transportation's Complete Street Policy. This policy states "the District's transportation network as a whole shall accommodate the safety and convenience of all users, recognizing that certain individual corridors have modal priorities." Rock Creek Park is treasured natural recreational resource in the District of Columbia. Weekend usage by bicyclists is incredibly high with the closure of Beach Drive. The modal priority on Broad Branch must include bicyclists and pedestrians.

Thank you for the opportunity to comment on the Broad Branch Environmental Assessment and for your efforts to improve the community through this project.

Sincerely,

Greg Billing  
Advocacy Coordinator

## Response to Greg Billing - Washington Area Bicyclist Association

Thank you for your comments.

### Responses to comments:

1. Comment noted. The Preferred Alternative, Alternative 3 Modified, would enhance public access to Rock Creek Park from adjacent neighborhoods by providing a sidewalk throughout the project corridor. Alternative 3 Modified, is the alternative with the least environmental impacts while meeting the requirements of the District of Columbia's Priority Sidewalk Assurance Act of 2010. All of the Candidate Build Alternatives would potentially affect historic resources and parklands protected under Section 4(f). The Act requires the selection of the Least Overall Harm Alternative, which has been determined to be Alternative 3 Modified.

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(responses continued)

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