

L AGENCY COMMENTS AND RESPONSES

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

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U.S. Commission of Fine Arts	L-18
U.S. Environmental Protection Agency	L-22

Their statements and responses to their comments are documented herein.



Mary M. Cheh
Councilmember, Ward 3
Chair, Committee on Transportation and the Environment

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DDOT
COUNCIL OF THE DISTRICT OF COLUMBIA
1350 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20004
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Office: (202) 724-8062
Fax: (202) 724-8118
mcheh@dccouncil.us
www.marycheh.com

November 15, 2013

Wayne Wilson
DDOT Project Manager
District Department of Transportation
55 M Street, SE
Washington, DC 20003

Dear Mr. Wilson,

In planning the rehabilitation of Broad Branch Road, the District Department of Transportation ("DDOT") must address the community's long-term needs as well as the District's established policy goals. Although Candidate Build Alternatives 2, 3, and 4 all include needed improvements to the roadway infrastructure and storm water management systems, only Alternative 4 provides for the needs of all users, including both pedestrians and cyclists. By including a bike lane and sidewalk throughout the entire 1.5-mile stretch of Broad Branch Road, Alternative 4 best serves the surrounding community and the District as a whole.

First, having a dedicated bike lane along this stretch conforms to the District's express policy goal of having a world-class bicycle transportation system. Such a system must provide for easy, safe commuting and for recreational bicycling. Currently, commuters use Broad Branch Road as both an alternative to Connecticut Avenue as well as a means to access Rock Creek Park and its multiuse trails. Due to its current lack of sidewalk or bike lane, however, these trails are difficult and dangerous for bicyclists to access. Under Alternative 4's plans, bicyclists would have an easier and safer time using Broad Branch Road as a means of commuting to work and gaining better access to the amenities of Rock Creek Park.

Second, a dedicated bike lane along this stretch improves everyone's safety: pedestrians, bicyclists, and motorists. Currently, only the southern portion of Broad

Response to Mary Cheh, Ward 3 Councilmember

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 require impacts to 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 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 this 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 impacts to historic resources, trees, and streams than Candidate Build Alternatives 3 and 4.

Branch Road is mapped as an on-street bike route. The 2011 DC bike map describes it as having poor biking conditions. Simply constructing a sidewalk, as proposed under Alternative 3, would not address safety concerns: streets with sidewalks but no bike lanes create dangerous conditions for pedestrians and cyclists, as cyclists alternate between biking on the street and on the sidewalk. And by having a dedicated bike lane, motorists' anxiety about cyclists weaving in and out is eliminated.

Thirdly, although Alternative 4 carries the longest construction time and highest cost, it best serves the community's needs. And, the community, through the Chevy Chase Advisory Neighborhood Commission, has expressed a desire for a bike lane along this stretch. The community thus recognizes that it will reap the greatest benefit from a reconstructed roadway with a sidewalk and dedicated bike lane.

Finally, it should be noted that Alternative 4 will increase enjoyment of Broad Branch Road and Rock Creek Park without destroying the road's current rural serenity. Of course there will be short-term disturbances to the surrounding environment, but the final product will leave this stretch as beautiful as (and certainly more enjoyable than) before the rehabilitation. For all of these reasons, I urge DDOT to move forward with Alternative 4.

Sincerely,



Mary M. Cheh

(responses continued)

For the reasons cited above and within this 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.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
District Department of the Environment

Office of the Director



MEMORANDUM

TO: District Department of Transportation
 Infrastructure Project Management Administration
 55 M St. SE
 Washington, DC 20003
 Attn: Wayne Wilson, DDOT Project Manager
 Submitted via email to: BroadBranch@parsons.com

FROM: Victoria North
 Acting Environmental Review Coordinator

THRU: Harrison Newton
 Acting Chief of Staff

DATE: November 22, 2013. Corrected November 26, 2013, noted in highlight yellow.

SUBJECT: Environmental Assessment: Broad Branch Rd. Rehabilitation

On behalf of the District Department of the Environment (DDOE), I am submitting comments on the Broad Branch Rd. Rehabilitation.

Comments from Water Quality:

The following documents were consulted in the EISF review process:

1. D.C. Department of Consumer and Regulatory Affairs (DCRA), District of Columbia Wetland Conservation Plan. August 1997.
2. D.C. Groundwater Resources Studies (series of four reports).
3. Johnston, P.M., Geology and Ground-Water Resources of Washington, D.C. and Vicinity. USGS Water Supply Paper (WSP) 1776. Reston, Virginia, 1964.
4. U.S. Geological Survey (USGS), Topographic Map Washington West Quadrangle 7.5 Minute Series, 1965. Photo Revised 1982
5. Federal Highway Administration (FHWA), U.S. Department of Transportation, and District Department of Transportation (DDOT), 2013. Environmental Assessment Section 4(f) Evaluation, Rehabilitation of Broad Branch Road, NW, Washington, DC, Date of Report: October 2013.

**Response to District Department of the Environment
 (Department of Energy and Environment)**

Thank you for your comments.

Water Resources/Wetlands

The Environmental Assessment (EA) report was reviewed for water-related issues in accordance with the D.C. Environmental Policy Act and regulations, Sections 7201.2(c), (d), and (l).

Environmental Setting

Geologically, the project site is located in the Piedmont province on the edge of the Coastal Plains province. The region is made up of late Proterozoic and Paleozoic igneous rock (formed by molten rock that has come to the surface and cooled) and metamorphic rock (Physically and/or chemically changed due to heat and pressure) that has been strongly weathered and is buried under 2 to 20 meters of soil. The metamorphic rock is very complex due to the number of times it has been altered and often contains mineral deposits including gold, talc, kyanite, slate, and feldspar (FHWA and DDOT, 2013, and USGS, 1965)

Environmental Consequences

The EA was reviewed for water-related issues in accordance with the D.C. Environmental Policy Act and regulations, Section 7201.2(c), (d), and (l). Sections 7201.2(c), (d), and (l) implementing regulations provide that a project should be assessed to determine whether the action might:

- (a) Significantly deplete or degrade groundwater resources;
- (b) Significantly interfere with groundwater recharge; and/or
- (c) Cause significant adverse change in the existing surface water quality or quantity.

Groundwater

(The following addresses requirements of Sections 7201.2(c) and (d) of the Environmental Policy Act regulations)

The purpose of the proposed improvements is to rehabilitate the existing roadway infrastructure and stormwater management system. Therefore, the proposed improvements would require limited excavation or disturbance of soils for the addition of new pavement, curbs, gutters, sidewalk and/or bike lanes, indicating that the shallow excavation is expected in association with the improvements. Therefore, dewatering of groundwater may not be required during the site development. Overall there is no expected impact on groundwater flow as a result of the proposed project.

In the EA, it is stated that there are no hazardous wastes/materials that will affect groundwater quality or be generated within the vicinity of the project (FHWA and DDOT, 2013). Consequently, if the guidance provided herein is adhered to, the project is anticipated to have minimal or no impact on groundwater quality.

The proposed project would increase the impermeable surface, which does not allow for as much rainwater to recharge naturally. Therefore, the proposed development at the site is expected to have an impact on groundwater recharge in the area.

Responses to comments:

1. Dewatering of groundwater may be required for activities such as utility excavation, culvert installation, trench digging, or other subsurface activities. As indicated in Section 4.11.2 of this Revised Draft EA, construction dewatering operations would require a permit from US EPA under Section 402 of the Clean Water Act.
2. Comment noted.
3. The Preferred Alternative would result in an additional 80,176 square feet of impervious surfaces. Design refinements resulted in approximately a 3% reduction in additional impervious surface compared to the original Alternative 3 (see Table 4-1 of this Revised Draft EA). As discussed in Section 4.1.2 of this 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.

Surface Water

(The following addresses requirements of Sections 7201.2(c) and (d) of the Environmental Policy Act regulations)

In the EA, it is stated that the proposed improvements will reduce the volume and velocity of stormwater runoff entering receiving surface waters by increasing retention and infiltration. Consequently, the project is expected to have minimal impact to surface water flow.

The proposed improvements include the 1.5-mile segment of Broad Branch Road, NW, a portion of which abuts the southwest border of Rock Creek Park. Therefore, short-term water quality impacts may result from required in-stream work and erosion following ground disturbance and earthmoving operation. Based on the information provided in the EA, erosion and sediment control plans, stormwater management plans, and a treatment train of BMP techniques will be developed as a part of the project in order to minimize direct waterway disturbance and sediment from construction area. It is also stated that the water discharge permit from any point source will be acquired from the US Environmental Protection Agency (US EPA) associated with activities such as utility excavation, culvert installation, trench digging, or other subsurface activities. Therefore, minimal or no impact to surface water quality is anticipated to result from the project.

Conclusion

In view of the above, the WQD has assessed that there is no apparent significant adverse impact or likelihood of substantial negative impact to water quality and quantity with regards to Sections 7201.2(c), (d), and (l) of the Environmental Policy Act.

Comments from Hazardous Waste:

The Hazardous Waste program has reviewed the materials provided by the project. The materials indicate that no Hazardous Wastes and no Hazardous Materials are anticipated in relation to the project. The materials also indicate that plans for spill response and plans for the management of contaminated soil and contaminated groundwater will be prepared prior to project initiation.

Based on the information provided, the Hazardous Waste program reminds the project to obtain an EPA ID# for the project before Hazardous Waste is generated. If a spill occurs, a temporary EPA ID# must be obtained as soon as is practicable.

Please be advised that this correspondence in no way precludes, supersedes, or circumvents any other permits or processes that may be required by the District of Columbia or any other permitting body to perform work within in the District.

For more information please contact me by phone at (202) 535 1909 or via email at Victoria.North@dc.gov.

4. Comment noted. As discussed in Section 4.1.2 of this Revised Draft EA, minor, long-term benefits to surface water are anticipated with implementation of the proposed stormwater management measures.
5. Comment noted.
6. Comment noted.
7. Comment noted.
8. Comment noted. DDOT would obtain an EPA ID# for the project before any type of hazardous waste is generated.
9. Comment noted.

DDOE appreciates the opportunity to submit these comments, and we look forward to working with the Broad Branch Rd. Rehabilitation staff as this project continues to be developed.

If you have any questions, please contact:

Ms. Victoria North
(202) 535-1909
victoria.north@dc.gov

CC: Harrison Newton
Ibrahim Bullo

**WPD review comments on the EA # N-0005, Broad Branch Road, Rehabilitation,
Broad Branch Road between Linnean and Beach Drive NW**

Thank you for the opportunity to provide comments on the Environmental Assessment (EA) for the rehabilitation of Broad Branch. Because the Watershed Protection Division (WPD) focuses on protecting and restoring the streams and rivers of the District of Columbia, WPD will focus our remarks on these aspects of the proposed actions in the Broad Branch Road corridor.

WPD is currently working on a stream daylighting project adjacent to the northern most portion of the proposed DDOT Broad Branch project area. Because of the proximity of these two efforts, DDOE and DDOT have closely coordinated their projects. DDOE and DDOT have agreed to terms of a Memorandum of Understanding that state that DDOT will, "Construct and maintain one bioretention cell or equivalent stormwater retention facility in the public right-of-way of Broad Branch Road, NW" in the area where DDOE and DDOT's projects overlap. The bioretention cell in this area is crucial to the success of the stream daylighting because it will both treat stormwater from Broad Branch, but also provide for groundwater recharge to the daylighted stream. PRB is pleased to note that each alternative considered as a part of the Broad Branch Road rehabilitation includes installing bioretention along this portion of the project area.

The EA states that "all Candidate Build Alternatives....will incorporate stormwater systems that will accommodate the infiltration of the first 1.2 inches of stormwater from the project area." WPD commends DDOT for committing to this goal throughout the project area, however it is not clear to WPD how DDOT will achieve this level of stormwater retention. WPD is concerned because:

- All proposed alternatives other than the no-build alternative include an increase in impervious surface in the project area;
- The right-of-way in the project area is already confined due to steep slopes on one side of the roadway and the stream on the other; and
- All proposed alternatives other than the no-build alternative include "a stormwater sewer with perforations that would allow for *some* of the stormwater to naturally infiltrate as it travels through the culverts. This type of system would compensate for *some* of the impervious surfaces in the area." (Emphasis added)

Because there is little detail in the EA about the perforated stormwater sewer nor is it included in the conceptual designs, DDOE WPD requests that the final EA and the selected alternative include greater details including conceptual designs of the proposed perforated stormwater sewer. Furthermore WPD requests that DDOT provide some information on the maintenance requirements of this proposed stormwater infiltration and treatment system.

WPD is thankful to DDOT for the chance to comment on the EA for the rehabilitation of Broad Branch Road. WPD recognize that plans this project will be submitted to DDOE

Response to Watershed Protection Division [DDOE]

Thank you for your comments.

Responses to comments:

1. The stream daylighting project adjacent to the northern most portions of the proposed roadway improvement has been completed by the Watershed Protection Division of DOEE. Close coordination was maintained between DDOT and the DOEE during the design and construction of the project. The proposed stormwater management designs included in the Preferred Alternative accommodate and supplement the treatments provided by the daylighting project.
2. DDOT is committed to incorporating designs for stormwater management that will accommodate the infiltration of the first 1.2 inches of stormwaters. Details on the perforated stormwater sewer will be developed during the project's design phase and will be shared with the DOEE as the designs progress.
3. DDOT will continue to coordinate with DOEE and will submit design plans for the project to DOEE's review and approval using the District's stormwater regulations and guidebook.

for stormwater review and approval using the District's newly adopted stormwater regulations and guidebook. Given the proximity of the roadway to Broad Branch DDOE WPD will take a keen interest in ensuring that DDOT has done its utmost to improve the water quality of this impaired waterway through treating and infiltrating stormwater in the area of disturbance to the "maximum extent practicable." WPD looks forward to working with DDOT as the project moves forward to ensure its success.

3

Rock Creek Park

DDOT Broad Branch Road Environmental Assessment and Section 106 Compliance Review Comments

November 22, 2013

Reviewers: Cindy Cox, Deputy Superintendent (CC); Don Kirk, Chief of Maintenance (DK); Simone Monteleone, Cultural Resources Program Manager (SM); Nick Bartolomeo, Chief of Resources Management (NB); Bill Yeaman, Natural Resource Management Specialist (BY); Joe Kish, Natural Resource Management Specialist (JK); Joel Gorder, Environmental Protection Specialist, National Capital Region (JG); Tammy Stidham, Lands, Resources and Planning, National Capital Region (TS)

No.	Reviewer	Page Number, Paragraph and Line Number	Comment/Proposed Revision
1.	N/A	N/A	Note: Comments 2 – 32 refer to the Environmental Assessment and Section 4(f) Evaluation.
2.	NB, BY	Globally	DDOT should coordinate with DC Water during the planning of this project. There are sewer lines under Broad Branch, one that is over 100 years old, that have chronically leaked over the years. These sewers need to be fully repaired or replaced during this project to protect water resources and Broad Branch.
3.	NB	Globally	Has DDOT explored under-road options for stormwater mitigation, such as retention/slow release basins? If not, they should be considered. Broad Branch floods quickly because it drains a significant amount of impervious surface, much of which is DDOT infrastructure. Reducing the rate of stormwater flow into Broad Branch would reduce erosion and improve safety.
4.	BY	Globally	All retaining walls should be at the minimum height necessary without compromising their engineering and stabilization function.
5.	BY	Globally	Please include information about traffic management during the project. Will Broad Branch Road be fully closed or closed in stages, or will limited access be maintained?
6.	BY	Globally	Gabions will not be considered for stream bank stabilization, if needed. Rip rap can be used if needed. Also, the EA should include a commitment by DDOT to remove any existing concrete spillways.
7.	JK	Page S-9; third paragraph under S.5	Please include information from the tree survey directly into the EA, as this would increase understanding of exactly where the impacts would occur.
8.	JK	Page S-8 and globally	Has DDOT conducted a traffic/safety study for the proposed changes (Option C) at the Brandywine/Broad Branch intersection? If so, please include this information in the EA.
9.	JK	Page S-13; second paragraph	Access permits to work in the creek also will need to be obtained through NPS.
10.	JK	Page S-13; fifth paragraph	Please identify the impacts to trees specifically on NPS property.
11.	BY	Page 1-6, 1 st paragraph, Fig. 3-15	Grant Rd. is not a "signed" bicycle route or a designated park bike route. Please eliminate the reference.

Response to National Park Service

Thank you for your comments.

Responses to comments:

1. Comment noted.
2. The leaking sewer lines are described in Sections 3.1.2, 3.3.8 and 3.3.9 of this Revised Draft EA. DDOT will continue to coordinate with DC Water during the project's design phase and construction phases to align utility replacement of decaying sewer lines along the project roadway.
3. Options for various stormwater management techniques such as under-road options, e.g. retention/slow release basins will be further developed during the project's design phase.
4. The height of all retaining walls have been developed so as to minimize visual intrusion without compromising safety and stability. See Section 2.3.1 for further discussion of the retaining walls and representative figures/renderings.
5. Appendix E provides a conceptual detour plan that could be implemented during the construction phase of the project. A final transportation management plan will be developed during the project's final design and construction phases.
6. Comment noted. Gabions and rip-rap will be considered for stream bank stabilization as appropriate. DDOT will remove damaged concrete spillways.
7. Table S-1 and Table 4-5 of this Revised Draft EA identify the number of trees impacted within the limits of disturbance for the Preferred Alternative (as identified by the tree survey). The number of trees impacted on NPS lands is provided in Table 4-8. Locations of impacted trees within the limits of disturbance for the Preferred Alternative have been added to conceptual alignment plans in Appendix B.
8. A traffic/safety study specifically for the Brandywine/Broad Branch intersection has not been performed at this time.
9. DDOT will obtain the necessary access permits from NPS to work within Broad Branch.

Rock Creek Park

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11.	BY	Page 1-6, 1 st paragraph, Fig. 3-15	Grant Rd. is not a "signed" bicycle route or a designated park bike route. Please eliminate the reference.

(responses continued)

10. Table S-1 and Table 4-8 of this Revised Draft EA provide the number of trees on NPS land potentially impacted by the proposed action.

11. Comment noted; Section 1.2.3 of this Revised Draft EA has been revised.

Rock Creek Park

DDOT Broad Branch Road Environmental Assessment and Section 106 Compliance Review Comments

November 22, 2013

Reviewers: Cindy Cox, Deputy Superintendent (CC); Don Kirk, Chief of Maintenance (DK); Simone Monteleone, Cultural Resources Program Manager (SM); Nick Bartolomeo, Chief of Resources Management (NB); Bill Yeaman, Natural Resource Management Specialist (BY); Joe Kish, Natural Resource Management Specialist (JK); Joel Gorder, Environmental Protection Specialist, National Capital Region (JG); Tammy Stidham, Lands, Resources and Planning, National Capital Region (TS)

12.	BY	Page 2-4, 2 nd paragraph	Text says that "Improvements to pipes and outfalls located within Rock Creek Park will be the responsibility of the NPS and will be coordinated with the proposed action." This needs clarification. A significant portion of the outfall pipes involved with the project cross through NPS land and most if not all of the outfalls involved in this project are on NPS land. These are DDOT's responsibility. The statement in the EA either needs to be eliminated or clarified.	12
13.	JK	Page 3-39; District Parks	It appears that NPS owns the triangle at Nevada and Broad Branch Road. (LTO 367 and 421). Please confirm.	13
14.	JK	4.1.1 Alternative 2 and Globally	Please identify the location of the 249 sq. feet outside of the DC Right of Way.	14
15.	JK, NB	4.1.4 Vegetation, fourth paragraph	It is not clear that DDOT can define disturbance to up to 462 trees as a "minor, long-term impact." This should be a major, short-term impact, which DDOT proposes to mitigate through replanting.	15
16.	JG	4-52 and following (4(f) section), and Globally	DDOT noted a possible exemption for this project from the city's Complete Street Program, which encourages the provisions of sidewalks along DC streets. Has DDOT investigated the possibility of receiving the exemption for this project? If there is no possibility for an exemption, it appears that Alternative 2 could not be carried forward. Please confirm.	16
17.	TS	4-52 and following (4(f) section)	The project indicates that there will be temporary impacts from the action, but does not quantify the impacts. This needs to be done in the context of the Section 4f evaluation.	17
18.	TS	4-52 and following (4(f) section)	Mitigation is missing in the Section 4f evaluation. The evaluation states that it is being discussed as a Section 106 matter - which is the correct venue, since these properties are historic. However, mitigation will need to be documented in the 4f and the MOA for both permanent and temporary impacts.	18
19.	TS, JG	4-52 and following (4(f) section)	Alt 2 is the alternative that is least harm. In this EA/4(f) analysis, no preferred alternative has been selected. However, although we agree that there is no prudent and feasible alternative to avoid section 4(f), if Alternative 2 is the alternative that is least harm, DDOT must choose Alternative 2.	19
20.	TS	4-52 and following (4(f) section)	The Section 4(f) evaluation needs to recognize and consider the Rock Creek Park Historic District.	20
21.	TS	4-52 and following (4(f) section)	DDOT and NPS should reach an understanding, as soon as possible, of how any additional Right of Way will be acquired, such as an easement, land transfer, or land exchange.	21

12. The responsibility for improvements to pipes and outfalls on NPS property has been clarified – see Section 2.3.1 - Drainage and Stormwater Management.

13. Correct - NPS owns the triangle at the intersection of Nevada Road and Broad Branch Road (LTO 367 and 421).

14. Areas of disturbance outside of the DDOT-owned right-of-way are identified on the conceptual plan for the Preferred Alternative in Appendix B. There are seven locations where minor encroachments onto Rock Creek Park occur. These are presented in Table 2-1 and shown in Figure 2-3.

15. Design refinements incorporated into the Preferred Alternative 3 Modified resulted in reduced clearing and grading. This modification reduced the estimated number of trees impacted under Alternative 3 by approximately 18% or 83 trees

16. The Preferred Alternative (Alternative 3 Modified) includes sidewalks along the west side for the entire length of roadway improvement. The sidewalks are typically 6-feet wide except in the areas fronting the Italian, Malaysian and Peruvian embassy properties where the width was reduced to 5 feet to avoid encroachment on these sovereign nation properties. The majority of proposed improvements, including sidewalks, have been incorporated within the existing DDOT-owned right-of-way. The inclusion of the sidewalks meets the project's Purpose and Need and satisfies the City's Sidewalk Act. DDOT does not intend to seek an exemption for the project.

17. Temporary impacts to historic Section 4(f) resources are limited to the temporary use of the original stone and metal boundary markers which are considered contributing elements to the Rock Creek Park Historic District. These markers would be re-set and no quantifiable temporary impact (e.g. acreage of disturbance) would be associated with this action. Areas of estimated temporary impacts on parkland Section 4(f) resources, i.e., Rock Creek Park, have been added to Revised Draft EA Table 4-12.

18. The draft MOA has been revised to address NPS and DC SHPO comments, and is included as Appendix O. A final executed version of the MOA will be attached to the FONSI.

Rock Creek Park

DDOT Broad Branch Road Environmental Assessment and Section 106 Compliance Review Comments

November 22, 2013

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19.	TS, JG	4-52 and following (4(f) section)	Alt 2 is the alternative that is least harm. In this EA/4(f) analysis, no preferred alternative has been selected. However, although we agree that there is no prudent and feasible alternative to avoid section 4(f), if Alternative 2 is the alternative that is least harm, DDOT must choose Alternative 2.	19
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(responses continued)

19. The Preferred Alternative, Alternative 3 Modified, is the Least Overall Harm Alternative because it minimizes the impact footprint of the proposed improvements while meeting the requirements of the project's Purpose and Need, including adherence to the District of Columbia's Priority Sidewalk Assurance Act of 2010. Candidate Build Alternative 2 does not meet the requirements of the Act throughout the entire roadway corridor.
20. The Rock Creek Park Historic District is addressed throughout the Section 4(f) Evaluation.
21. DDOT has coordinated the minimal right-of-way requirements with the NPS – see Section 5.1 for discussions of the coordination efforts to date. DDOT will continue coordination with NPS as the project moves into the final design and construction phases.

Rock Creek Park

DDOT Broad Branch Road Environmental Assessment and Section 106 Compliance Review Comments

November 22, 2013

Reviewers: Cindy Cox, Deputy Superintendent (CC); Don Kirk, Chief of Maintenance (DK); Simone Monteleone, Cultural Resources Program Manager (SM); Nick Bartolomeo, Chief of Resources Management (NB); Bill Yeaman, Natural Resource Management Specialist (BY); Joe Kish, Natural Resource Management Specialist (JK); Joel Gorder, Environmental Protection Specialist, National Capital Region (JG); Tammy Stidham, Lands, Resources and Planning, National Capital Region (TS)

22.	TS	4-52 and following (4(f) section)	The document discusses using context-sensitive design. Elements of the roadway treatments – such as curbing, guttering, drainage – should be discussed with NPS to make this park gateway road more in line with elements found on nearby Rock Creek Park roads.	22
23.	TS	4-52 and following (4(f) section)	NCPC will need to review and will likely want to be a cooperating agency.	23
24.	TS	4-52 and following (4(f) section)	There needs to be a final Section 4f Evaluation that includes mitigation, a determination of a preferred alternative, and completed analysis of how DDOT proposes to minimize harm.	24
25.	JK	Appendix B <all sheets>	The location/scope of the encroachments should be more defined on these maps.	25
26.	BY	Appendix B, Sheets 3 and 4 of all alternatives	The need for the extensive cutting which is shown on the south side of Broad Branch Rd from station 39+00 to 45+00 seems unnecessary. The area of proposed cut should be significantly reduced.	26
27.	BY	Appendix B, Sheets 4 and 5 of all alternatives	Please consider including additional bioretention areas in the project. Possible locations include the west side of the driveway at station 46+00, and the end of the alley at station 58+00.	27
28.	BY	Appendix B, Sheets 9 of all alternative	Are the proposed retaining walls on the north side of Broad Branch Rd. above and below the Soapstone culvert adequate for addressing major storm flows and preventing flooding of the roadway?	28
29.	BY	Appendix B, Sheet 6, Alternative 2	Reduce the size of the cut behind the proposed retaining wall on the west side of broad Branch Rd. between stations 64+00 and 66+00.	29
30.	BY	Appendix B, Sheet 6, Alternative 2	Excessive cut is indicated on the north side of the alley between station 68+00 and 69+00. Suggest significantly reducing the area of cut or possibly using this area to expand the proposed rain garden located on the south side of Brandywine St.	30
31.	BY	Appendix B, Sheet 3, Alternatives 3 and 4	Please confirm that the proposed retaining wall, located in the vicinity of station 39+00, does not interfere with the drainage which enters Broad Branch Rd. from the embassy property on the west side of the road.	31
32.	BY	Appendix B, Sheet 6, Alternative 4	Please consider including rain gardens on both sides of Brandywine St. at the intersection with Broad Branch Rd. as is being proposed for the other alternatives.	32
33.	N/A	N/A	Note: Comments 34 – 52 refer to the draft Section 106 Compliance Review	33
34.	SM	2-1; GLOBAL	There are two different spellings of archeology/archaeology in the document. Please check the document for consistency.	34

22. Examples of the context sensitive designs are shown in Figures 2-4, 2-5 and 2-6. These conceptual designs have been reviewed with NPS and will be further refined as the project progresses to the final design phase. Coordination will continue with NPS. All designs will be in accordance with DDOT Standards and Specifications.

23. As indicated in Appendix F Agency Scoping Letters, the Federal Highway Administration (FHWA) invited the National Capital Planning Commission (NCPC) to become a Cooperating Agency for the project; however, NCPC declined.

24. The Final Section 4(f) Evaluation is presented in Section 4.12 and provides the basis for the di minimis determination.

25. The seven areas of encroachments upon NPS lands have been indicated on the concept plans of the Preferred Alternative in Appendix B.

26. The Preferred Alternative (Alternative 3 Modified) does not require the “area of extensive cutting.” Minor shifting of the alignment and relocation of the retaining wall has reduced the need for the grading and clearing shown in the original Candidate Build Alternatives. See the concept plans for Alternative 3 Modified in Appendix B.

27. Further consideration of additional bioretention areas will take place during the project’s final design phase.

28. The retaining walls will redirect stormwater flows towards Soapstone Creek. The enlarged culvert will be capable of carrying larger water volumes and along with other stormwater management improvements, will help ameliorate roadway flooding – see Section 2.3.1.

29. The Preferred Alternative (Alternative 3 Modified) does not require the extensive grading and cutting noted. Minor shifting of the alignment and relocation of the retaining wall has reduced the need for the grading and clearing shown in the original Candidate Build Alternatives. See the concept plans for Alternative 3 Modified in Appendix B.

Rock Creek Park

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November 22, 2013

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33.	N/A	N/A	Note: Comments 34 – 52 refer to the draft Section 106 Compliance Review	33
34.	SM	2-1; GLOBAL	There are two different spellings of archeology/archaeology in the document. Please check the document for consistency.	34

(responses continued)

30. The Preferred Alternative (Alternative 3 Modified) does not require the extensive grading and cutting noted. Minor shifting of the alignment and relocation of the retaining wall has reduced the need for the grading and clearing shown in the original Candidate Build Alternatives. See the concept plans for Alternative 3 Modified in Appendix B.

31. The retaining wall will not interfere with drainage flows. The wall will be designed to direct runoff flows (along the back side of the wall) towards the receiving stormwater facilities.

32. Conceptual designs for the Preferred Alternative at the Brandywine Street intersection include relatively large green spaces that are very logical locations for rain gardens. These stormwater management elements will be considered in the final design phase.

33. Comment noted.

34. Text has been revised to archaeology unless it refers to the title of a law or document.

Rock Creek Park

DDOT Broad Branch Road Environmental Assessment and Section 106 Compliance Review Comments

November 22, 2013

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35.	SM	2-2; 5 th paragraph	The document states that there have been no investigations of the “current project area.” Are you referring to within the actual LOD only? Please include the investigation conducted by Straughn Environmental (J. Gibbs) for the DC Water project proposed for Soapstone Valley. (Please note that the draft report was heavily commented on and DCHPO has not received comments back from the first review).	35
36.	SM	2-3; Figure 2-1	This should have an additional item in the legend to include Soapstone Valley as a NRHP-eligible resource of expanded Rock Creek Park Historic District. Some minor investigation was done within Soapstone Valley as part of the DC Water project (draft report was submitted to Ruth Troccoli and NPS).	36
37.	SM	2-4; 1 st paragraph	The NPS is currently working on the update to the NRHP nomination for the Civil War Fort Sites/FOCI Park System. We suggest this be noted.	37
38.	SM	2-6; 3 rd paragraph	Need a space between “features” and “may”.	38
39.	SM	2-7; 2 nd paragraph and Table 2-2	Please note that the Rock Creek Park Historic District nomination is being updated and expanding its boundaries to include Soapstone Valley and the trail within that Valley.	39
40.	SM	Table 2-2	Thank you for noting that the updated nomination will include post-WW II resources and Mission 66 resources. These features are eligible currently and will be formalized as part of the updated nomination. Please note that in the table that they are being re-evaluated. We are happy to forward you the draft that will be submitted to DCHPO within the next few weeks. This draft takes into account comments that were received from NPS and, informally, the National Register.	40
41.	SM	Figure 2-2	Please include Soapstone Valley as part of the proposed boundary expansion and the trail.	41
42.	SM	2-9	Regarding the two Mission 66 bridges, after the last sentence of the respective paragraphs, please note that they are being re-evaluated as part of the Rock Creek Park Historic District nomination update.	42
43.	SM	2-13	Add “of” between “construction” and “a” at the last sentence of the second paragraph.	43
44.	SM	2-15	The line in the last paragraph should take into account that this Mission 66 construction period and related infrastructure is being re-evaluated as part of the update to the Rock Creek Park Historic District nomination.	44
45.	SM	2-18; 3 rd paragraph	Improper spacing is causing the text to appear to be two paragraphs. Please correct.	45
46.	SM	2-18, 2-20	Regarding the last two lines and overall DC road eligibility discussion, determination will be left to the DCHPO. However, the vegetative landscape along the roads adjacent to the park does add to the setting for Rock Creek Park and its loss (complete or partial) could impact the setting and feeling in this area of the park.	46
47.	SM	2-20	Please note that the 27 th Street Bridge is being replaced.	47

35. The current project area refers to the LOD. Text on the recent survey in Soapstone Creek Valley has been inserted per comment.

36. Figures (n=2 in EA and n=3 in Section 106 Report: Figures 2-1, 2-2, and 2-22) have been revised to include the NPS jurisdictional boundaries of the Soapstone Creek Valley that will become part of the Rock Creek Park Historic District.

37. Text has been inserted per comment.

38. Text has been revised per comment.

39. Text has been inserted per comment.

40. Text has been inserted into the table per comment.

41. Figures (n=2 in EA and n=3 in Section 106 Report: (Figures 2-1, 2-2, and 2-22) have been revised to include the NPS jurisdictional boundaries of the Soapstone Creek Valley that will become part of the Rock Creek Park Historic District.

42. Text has been inserted per comment.

43. Text has been inserted per comment.

44. Text has been inserted per comment.

45. Text has been revised per comment.

46. The potential loss of vegetation along Broad Branch Road and within Rock Creek Park was assessed and is discussed in Sections 3.14. and 4.1.4 on Vegetation and in Sections 3.3.9 and 4.3.10 on Community Resources (Parks and Recreation) in this Revised Draft EA.

47. Text has been inserted per comment.

Rock Creek Park

DDOT Broad Branch Road Environmental Assessment and Section 106 Compliance Review Comments

November 22, 2013

Reviewers: Cindy Cox, Deputy Superintendent (CC); Don Kirk, Chief of Maintenance (DK); Simone Monteleone, Cultural Resources Program Manager (SM); Nick Bartolomeo, Chief of Resources Management (NB); Bill Yeaman, Natural Resource Management Specialist (BY); Joe Kish, Natural Resource Management Specialist (JK); Joel Gorder, Environmental Protection Specialist, National Capital Region (JG); Tammy Stidham, Lands, Resources and Planning, National Capital Region (TS)

48.	SM	3-4, 5 th paragraph; 3-6, 1 st line	Please add "a" between "with" and "concrete".	48
49.	SM	3-5, 2 nd paragraph; 3-6, 5 th paragraph	It should be noted that these boundary markers would need to be re-installed if "inadvertently" moved. Perhaps state that the boundary markers would be "temporarily re-located during construction and re-installed in the original location."	49
50.	SM	Section 3.4.2; Table 4-1	There is no discussion about loss of vegetation. If the entire road corridor is cleared of vegetation for any of these alternatives, this would also cause an effect. This should be mentioned as part of the analysis.	50
51.	SM	Section 4.3	NPS agrees that there wouldn't be an adverse effect to the overall Cultural Landscape for the Historic Trails or the Peirce Mill Cultural Landscape. The topic of cultural landscapes is being incorporated into the updated Rock Creek Park Historic District nomination. However, the loss of vegetation (if that is in the plans) should be noted as it will change the setting along the area of the park adjacent to Broad Branch. If no loss of vegetation is anticipated (or just a small amount), then perhaps this will not be an issue. But it isn't addressed at all and it should be examined.	51
52.	SM	Appendix B	Please provide separate PDF files of the three signed DOE forms for NPS records. Thank you.	52
53.	SM	FOR EA	Please note: Comments that are listed here for the Section 106 Compliance Review needs to be carried over into the Environmental Assessment. Thank you.	53

48. Text has been revised per comment.

49. Text has been inserted per comment.

50. The potential loss of vegetation along Broad Branch Road and within Rock Creek Park was assessed and is discussed in Sections 3.14. and 4.1.4 on Vegetation and in Sections 3.3.9 and 4.3.10 on Community Resources (Parks and Recreation) in this Revised Draft EA.

51. Text has been inserted based on analysis in this Revised Draft EA of tree removal within NPS property, per comment.

52. Electronic pdf copies of the three signed DOE forms were sent to the NPS on [date].

53. Text has been inserted into this Revised Draft EA as appropriate.

U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

22 November 2013

Dear Mr. Wilson:

Thank you for the opportunity to comment on the Environmental Assessment (EA) for the Rehabilitation of Broad Branch Road, NW, proposed by the District Department of Transportation (DDOT) and the Federal Highway Administration (FHWA). In addition to the comments provided in this letter, the Commission looks forward to formal review of the project design as it is developed.

The Commission of Fine Arts, a federal design review agency established in 1910, provides design advice for projects affecting the built environment of the national capital city, both public projects and private development in areas of high federal interest such as Rock Creek Park. In this capacity, the Commission's foremost concern when considering the proposed modifications to Broad Branch Road is the protection of the public value of Rock Creek Park, an important public resource and the largest piece of the urban park system of Washington, D.C. The Commission recognizes and supports the need for improvements to the roadbed and stormwater management system along Broad Branch Road, as well as to improve access to the road and the park for all users, and urges DDOT and FHWA to minimize the impact of any road modifications on the character and setting of Rock Creek Park.

Broad Branch Road, which runs in a narrow valley along the Broad Branch tributary stream of Rock Creek, forms the boundary of Rock Creek Park in the area addressed by the EA. The prevailing character of the road along this section of the park is a narrow two-lane roadway in a steep, wooded, and largely undeveloped landscape. This is consistent with the intent of Congress in establishing the park in 1890, when the act called for regulations to "provide for the preservation from injury or spoliation of all timber, animals, or curiosities within said park, and their retention in their natural condition, as nearly as possible." The stream valleys, in particular, have been identified since the early planning of the park as being of exceptional natural value and worthy of protection. The Senate Park Commission Report of 1902 suggests that construction of the park roads should "leave the wild sylvan character of the stream at the bottom of the gorge uninjured." The Rock Creek Park report prepared in 1918 by the Olmsted Brothers for the Board of Control of the park described the valley sections of the park—Rock Creek, Piney Branch, Broad Branch, and Military Road—as of first importance and stated that "it would be a great misfortune if any use should develop that would to the least appreciable degree injure the present charm and beauty of this valley scenery." In 1930, Rock Creek Park was included in the Shipstead-Luce Act area of jurisdiction of the Commission of Fine Arts to afford it protection from inappropriate private development along its edges.

Regarding the proposed undertaking to rehabilitate Broad Branch Road, NW, the Commission of Fine Arts has significant concerns about the negative impact on Rock Creek Park that would inevitably result from the considerable widening of the roadway and attendant improvements. Naturally, while none of the considered alternatives is without impact, the widest alternatives would have the greatest negative impact on the park and would cause in varying degrees a

Response to U.S. Commission of Fine Arts

Thank you for your comments.

Responses to comments:

1. 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, which requires the installation of a sidewalk for reconstruction of roadways that are currently lacking sidewalks. As discussed in Sections 4.2.2, 4.2.3, and 4.3.8 of this Revised Draft EA, use of architecturally compatible designs and materials for construction of the new Soapstone Creek Culvert, retaining walls, and outfall headwalls would minimize impacts to the character and setting of Rock Creek Park. The project has been closely coordinated with the National Park Service to ensure all proposed improvements minimize potential encroachments on Rock Creek Park lands. In addition, tree removal on both sides of the roadway 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 (see Revised Draft EA Section 4.1.4).
2. As noted in Response 1, the Preferred Alternative minimizes the width of the roadway and attendant improvements. The proposed improvements maintain the existing alignment and character of the existing roadway in order to preserve the context of a largely undeveloped landscape along its length.

character change to the current setting of the park. We offer the following specific comments regarding the alternatives presented in the EA.

Extent of paved area. The widening of the road infrastructure varies in the alternatives, but all would increase the total width of the paved road infrastructure; the least of these adds a masonry parapet and shoulder to the roadbed, and the most extensive—adding a parapet, a sidewalk, and a bike path—would increase the existing paved area from approximately 23 to 47 feet.

Retaining walls: Given the steep slope to the west of the road and the close proximity of the Broad Branch stream bed and retaining walls to the east of the road, all alternatives propose the widening of the road infrastructure and require the construction of retaining walls on both sides of the road, with a visible height up to 6.5 feet on the east side of the road and up to 16 feet on the west. No matter what the design or material of these walls, they will have a significant negative impact on the park due to their height and the change from a natural slope to a vertical wall.

Visual access to Rock Creek Park. The addition of stone parapets on the eastern side of the roadbed not only increases the width of the road infrastructure, but creates a barrier to views into the park, particularly from the west side of the road. We recommend that the element required as a barrier be designed to project off the existing roadbed (instead of increasing the width of the road) and to be more open to allow views through the barrier.

Loss of buffer and trees. Both the widening of the road infrastructure and insertion of retaining walls inevitably require the loss of trees above 4" dbh, from 285 in alternative #2 to 462 in alternative #4 in addition to smaller-scale understory vegetation. We note even more losses may occur due to construction disturbance. The effect of widening the road infrastructure also magnifies the discontinuity of tree canopy between the existing context of mature shade on both sides of the road, contributing to a change in character and compromising the green buffer to the adjacent neighborhood to the west.

Impact on development. The loss of tree and other plantings as a buffer to private properties on the west side of the roadway will increase visibility of existing structures as well as compromise the capacity for mitigation of any future development along this road with plantings. The apparent distance of existing structures to the western edge of the roadway infrastructure will decrease according to the increase of the proposal, from a minimum of several feet to about 24 feet in alternative #4. The Commission of Fine Arts is currently in review of a development proposal along this portion of Broad Branch Road under the Shipstead-Luce Act, and the mitigation proposed for this construction's impact on the park would not be possible under most of the EA alternatives.

Historic Resources. The widening of the road infrastructure in the alternatives entails the demolition of existing contributing historic structures, including the stone walls associated with the Villa Firenze estate and the Soapstone Creek culvert, as well as retaining walls and stormwater outfall structures along Broad Branch Creek.

In conclusion, although the EA identifies no induced or secondary effects caused by the alternatives, we find that the undertaking—due to the *cumulative effect* of increases in pavement, loss of trees and visual access to the park, and the elimination of landscape buffer to adjacent development—does in fact create negative effects on the park. We note the positive

3. The proposed travel lanes of the Preferred Alternative will be the same width as the existing (10-feet wide). In order to correct current drainage problems new curb and gutter will be included on each side of the paved roadway and sidewalks will be included on the west side of the roadway to be compliant with the District's Sidewalk Act (seen Response 1). With minor exceptions the elements making up the typical section of the Preferred Alternative will remain within the existing DDOT-owned public right-of-way (see Figure 2-3 and Appendix B).
4. As discussed in Section 4.3.8, the use of architecturally compatible designs and materials for construction of the new retaining walls would maintain the aesthetic quality associated with the rural feel of the roadway and match the rural architectural elements, such as the existing Soapstone Creek Culvert and Grant Road Bridge, that are characteristic of the Park. The majority of the retaining walls on the east side of the roadway (Rock Creek Park side) will replace existing walls that are in varying degrees of poor condition and disrepair.
5. As described in Section 2.3, 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. The higher walls are located on the west side of the roadway and are intended to minimize encroachment outside the DDOT-owned right-of-way and to limit cutting and clearing. Walls on the east side of the roadway will be designed to maintain slope integrity for safety purposes and still provide views of areas to the east from the new sidewalks. The walls are not expected to interrupt views of Rock Creek Park from residences located on the elevated slopes on the west side of the roadway.
6. As indicated in Section 4.1.4 of this 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.

character change to the current setting of the park. We offer the following specific comments regarding the alternatives presented in the EA.

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Retaining walls. Given the steep slope to the west of the road and the close proximity of the Broad Branch stream bed and retaining walls to the east of the road, all alternatives propose the widening of the road infrastructure and require the construction of retaining walls on both sides of the road, with a visible height up to 6.5 feet on the east side of the road and up to 16 feet on the west. No matter what the design or material of these walls, they will have a significant negative impact on the park due to their height and the change from a natural slope to a vertical wall.

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Impact on development. The loss of tree and other plantings as a buffer to private properties on the west side of the roadway will increase visibility of existing structures as well as compromise the capacity for mitigation of any future development along this road with plantings. The apparent distance of existing structures to the western edge of the roadway infrastructure will decrease according to the increase of the proposal, from a minimum of several feet to about 24 feet in alternative #4. The Commission of Fine Arts is currently in review of a development proposal along this portion of Broad Branch Road under the Shipstead-Luce Act, and the mitigation proposed for this construction's impact on the park would not be possible under most of the EA alternatives.

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In conclusion, although the EA identifies no induced or secondary effects caused by the alternatives, we find that the undertaking—due to the *cumulative effect* of increases in pavement, loss of trees and visual access to the park, and the elimination of landscape buffer to adjacent development—does in fact create negative effects on the park. We note the positive

(responses continued)

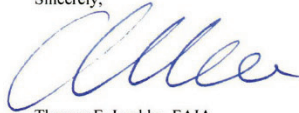
7. The Preferred Alternative will incorporate retaining walls to minimize encroachment on the west side of the roadway. The walls will be installed within DDOT-owned right-of-way and thus minimize the extent of grading and tree removal required on the adjacent sloped areas. This should maintain the visual buffer afforded to the residences located upslope of the roadway – see renderings provided in Figures 2-4, 2-5 and 2-6.
8. Impacts of the proposed improvements on these historic structures is addressed in Section 4.2.2 of this Revised Draft EA. As indicated in that section, the use of architecturally compatible designs and materials for construction of the new Soapstone Creek Culvert, retaining walls, and outfall headwalls would minimize impacts to these resources and the historic setting of the Rock Creek Park Historic District. The stone wall associated with the gateway to the Villa Firenze estate will be maintained and incorporated into the design for the adjacent retaining wall – see Figure 2-4
9. Alternative 3 Modified was developed to address these specific issues. The reduced typical section for the roadway and sidewalk minimizes the loss of trees and landscape buffers along the roadway. Unimpeded views of the park will be accommodated for pedestrians on the new sidewalks as well as from residences located upslope from the roadway.

aspect of one option within the EA alternatives, the reconfiguration of the intersection of Broad Branch Road with Brandywine Street, NW, which would reduce the impact of road infrastructure on the park by converting the existing Y-shaped intersection to a T-shape and consolidating public land for planting areas.

9

We welcome further discussion with you to balance the impacts of accommodating public access and safety with the stewardship of this significant public resource in Washington, D.C. The Commission of Fine Arts looks forward to reviewing the design of this undertaking as a public project as early as possible in the design phase.

Sincerely,



Thomas E. Luebke, FAIA
Secretary

Wayne Wilson
District Department of Transportation
Infrastructure Project Management Administration
55 M Street, SE
Washington, DC 20003



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

November 22, 2013

Mr. Wayne Wilson, Project Manager
District Department of Transportation
Infrastructure Project Management Administration
55 M Street, SE
Washington, DC 20003

RE: Rehabilitation of Broad Branch Road, NW Environmental Assessment
Washington, DC, October 2013

Dear Mr. Wilson:

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 U.S. Environmental Protection Agency has reviewed the Environmental Assessment (EA) for the Rehabilitation of Broad Branch Road, NW project in the District of Columbia.

The Federal Highway Administration (FHWA) in conjunction with the District Department of Transportation (DDOT), and in cooperation with the National Park Service (NPS), are proposing the rehabilitation of the 1.5 mile segment of Broad Branch Road, NW between Linnean Avenue, NW and Beach Drive, NW. The purpose of the proposed action is to satisfy operational and safety needs in a manner keeping with the setting of the project area. According to the EA, the needs for improvement relate primarily to deficiencies in the existing roadway infrastructure and stormwater management system; the safety of motorists, pedestrians, and bicyclists; and linkages to serve pedestrian and bicycle travel along the roadway itself as well as to the Rock Creek Park trail systems. A new permanent replacement culvert is also proposed for the roadway over Soapstone Creek.

In addition to the No Build Alternative, three Candidate Build Alternatives are considered. No preferred alternative has been selected. The areas of disturbance for the build alternatives range from 3.2 acres to 5.0 acres. In-stream work for this project would include replacement of the culvert at Soapstone Creek, reconstruction of culvert outfalls to Broad Branch and restoration of existing or construction of new retaining walls along Broad Branch. Stream impacts range from 296 to 599 linear feet. A portion of the existing road lies within the 10-year floodplain for Broad Branch stream. The area of impervious surface within the floodplain will increase due to the addition of new pavement, curbs, gutters, sidewalk, and/or bike lanes. It is

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Response to U.S. Environmental Protection Agency

Thank you for your comments.

Responses to comments:

1. Efforts to avoid and minimize impacts of the proposed project have continued during the development of the Preferred Alternative and will continue through final design. DDOT will continue to coordinate closely with the public regarding potential transportation, utility, noise, or other disruptions associated with construction of the proposed improvements.

estimated that between 240 and 465 trees with diameters at breast height greater than 4 inches could be impacted.

We suggest that the project team continue efforts to avoid and minimize impacts resulting from the project and closely coordinate with the public regarding potential transportation, utility, noise or other disruptions. In addition, we suggest that the team continue to investigate other Low Impact Development strategies as the project progresses. Specific comments and questions for your consideration are enclosed.

Thank you for the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Barbara Okorn; she can be reached at 215-814-3330.

Sincerely,



Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

Specific Comments

- Page S-5 discusses the culvert at Soapstone Creek. Full dimensions for the original culvert should be given as well as those for the emergency replacement culvert mentioned on Page S-3. 2
- The daylighting project related to the unnamed stream that empties into Broad Run should include more detail on the connectivity to the floodplain. (This is important as a considerable amount of the biogeochemical processes are related to the stream connection with its floodplain). 3
- The full dimensions (length, width, height) of the proposed culvert at Soapstone Creek should be clearly presented for all build alternatives. Wildlife passage needs should be considered and discussed. 4
- The discussions regarding the retaining walls for all build alternatives should be clarified. The range of the length of wall required (for each alternative) along Broad Branch is significantly different than the stream impacts presented in Table S-1. It is unclear how these numbers relate to each other. The method for installing and repairing the retaining walls should be described as well as temporary and permanent impacts to the aquatic and terrestrial resources. 5
- The discussion of the Soapstone Creek culvert for each of the build alternatives does not discuss the emergency culvert replacement. This should be clarified. 6
- Page 3-7-Additional justification should be provided to ensure there are no wetlands present in the project area that may be impacted by the project. While the National Wetland Inventory maps are a good screening tool, they are not always accurate. 7
- Page 4-4- it is unclear if groundwater impacts were assessed other than how they relate to drinking water. Paving, compacting, and retaining walls could potentially impact groundwater flow and relationship with surface water. This should be evaluated in the EA. 8
- Page 4-5- In regard to Broad Branch reconstruction activities, it should be clarified that the installation of the water quality catch basins to screen debris and filter sediment before discharging runoff to the existing outfalls is a permanent stormwater measure or a erosion and sediment control measure being used during the construction. Stormwater management facilities should not be located in streams or wetlands. 9
- The stormwater management system being proposed for the build alternatives would reduce the volume and velocity of stormwater entering the receiving streams by increasing the retention and infiltration. It has been stated that this measure will offset the impervious areas related to the build alternatives. It is unclear whether this measure 10

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2. Detailed descriptions of the existing culvert as well as the proposed improvements are provided in Section 2.3.1 of this Revised Draft EA.
3. The daylighting project is not part of the proposed project. Details on that project were provided in an Environmental Assessment prepared for the project by DOEE and NPS in 2012. () The discussion of the daylighting project within Section 1.6.8 of this Revised Draft EA for Broad Branch Road has been updated and additional details have been provided. Details regarding connections of the daylighted stream to the floodplain are not necessary to include in this Revised Draft EA in order to understand the components and effects of the proposed improvements to Broad Branch Road.
4. As indicated in Section 2.3.1 of this Revised Draft EA, the existing Soapstone Creek Culvert would be replaced with a 16 feet by 9 feet high precast arch culvert with an opening 16 feet wide by 4 feet high. The culvert would be 41 feet long. The culvert will include a natural bottom that will accommodate passage of aquatic wildlife and provide sufficient height for the passage of terrestrial animals. See Figure 2-8.
5. As discussed in Section 4.1.2 of this Revised Draft EA, short-term stream impacts would occur from in-stream work required for replacement of the crossing at Soapstone Creek, reconstruction of culvert outfalls to Broad Branch, restoration or construction of new retaining walls along Broad Branch, and installation of water quality catch basins to screen debris and filter sediment before discharging runoff to the existing outfalls. The length of stream impacts is less than the length of the proposed retaining walls because not all of the walls would require stream impacts for their construction. Total areas of temporary and permanent disturbance for the proposed improvements are provided in Table 4-1. These areas consist mostly of terrestrial habitats, with limited impacts to aquatic habitats. The limits of disturbance for streams presented in Table 4-2 includes areas of temporary and permanent impacts. The breakdown of temporary versus permanent impacts will be further refined during the detailed designs phase when methods for installing and repairing retaining walls have been determined and a formal delineation of jurisdictional waters of

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(responses continued)

6. The emergency replacement of Soapstone Creek Culvert is part of the existing roadway structures, which are discussed in Section 1.2.1 of this Revised Draft EA; the emergency replacement of Soapstone Creek Culvert was performed as a separate action independent of the Preferred Alternative identified in this Revised Draft EA.
7. A formal delineation of jurisdictional wetlands/water of the US will be performed during the design phase of the project.
8. The discussion of groundwater effects for the proposed project in Section 4.1.2 of this Revised Draft EA addresses project effects on the recharge of groundwater. As discussed therein, the proposed stormwater sewer with perforations and the proposed rain garden would compensate for some of the impervious surfaces and allow for groundwater regeneration closer to historic volumes. Considering the existing topography and depth of footers for retaining walls the project would have no effect on groundwater flow. Above-ground features of the walls along the west side of the roadway will be such that stormwater drainage will be accommodated along the backside of walls and directed to the stormwater systems. On the opposite of the roadway, storm waters will be conveyed via the new curb and gutter as proposed.
9. Permanent water quality catch basins will be incorporated into project designs as part of the stormwater management elements. As noted in Section 4.1.2 of this Revised Draft EA, catch basins will serve to screen debris and filter sediment before discharging runoff to the existing outfalls. These structures will not be located in the stream proper. Temporary stormwater management controls will also be implemented to minimize sedimentation of Broad Branch during construction activities. Details of these and other BMPs will be developed during the project's design phase.

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(responses continued)

10. The proposed stormwater management controls will account for the runoff generated by the roadway and attendant structures. Management of stormwater runoff along the developed upland areas along the roadway will be the responsibility of the private parcel owners. Although the improved stormwater system as proposed will alleviate much of the current drainage problems along the corridor, DDOT can only design for control measures within its right-of-way.

will also address the existing stormwater management inadequacies (volume and velocity associated with the road and further upland drainage areas) not just the replacing damaged or undersized drainage elements.

- Page 4-36- it is unclear if there will be relocations of utilities. If so, all impacts associated with relocation should be fully assessed.
- This project should comply with Executive Order 13112 regarding Invasive species.
- Impacts to migratory birds should be evaluated and the team should coordinate with the US Fish and Wildlife service regarding potential impacts to migratory birds and their habitats.
- All potential temporary impacts associated with the project should be described.
- Proposed mitigation for unavoidable impacts should be presented in the NEPA document.

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11. Table 4-9 of this Revised Draft EA provides the potential extent of utility relocations for the proposed improvements based on the limits of disturbance for construction. The precise extent of utility relocations would be determined in coordination with utility companies during the project's design phase.

12. The project will comply with EO 13112 Invasive species – see Section 4.1.4 of this Revised Draft EA.

13. The project will not represent any potential impacts to migratory birds -- see Section 4.1.3 of this Revised Draft EA.

14. The potential short-term or temporary construction impacts upon areas resources are described in Sections 4.1 through 4.9 of this Revised Draft EA.

15. Avoidance and minimization measures are discussed as part of the impact analyses in Chapter 4. Mitigation measures for unavoidable impacts to cultural resources are provided in the draft Section 106 Memorandum of Agreement in Appendix O of this Revised Draft EA; a final executed version will be attached to the FONSI.

Text regarding mitigation for unavoidable stream impacts has been added to Section 4.1.2.