

Memo-to-File

Route 1 Improvements at Fort Belvoir

November 20, 2012

In response to comments received by project stakeholders, additional analysis was completed. This Memo-to-File documents the additional project-related information after the Environmental Assessment dated June 1, 2012. While the additional analysis resulted in refinements to Alternative B, the Preferred Alternative, the analysis did not result in any substantial/significant changes to the affected environment or impacts of Alternative B that would change the impact analysis presented in the Environmental Assessment.

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1. REVISED DESIGN PLANS FOR ALTERNATIVE B

In response to comments and ongoing coordination with project stakeholders, Alternative B was refined following the completion of the June 1, 2012 Environmental Assessment (EA). Updated conceptual plans for **Alternative B Modified** are shown in **Figure 1** and the changes are described below, from south to north:

1. *Added SWM-1B in the northwest quadrant of the Telegraph Road intersection (see Sheet 1 of 6).* Stormwater management pond SWM-1B replaces SWM-2A (see #2 below). The area within which SWM-1B is located was already included in the limits of disturbance for which impacts were reported for both build alternatives in the EA; therefore, no additional impacts are expected as a result of this new stormwater management pond.
2. *Eliminated SWM-2A just east of Inlet Cove.* This pond, originally shown on Sheet 2 of 6 for Alternative B, was eliminated in response to comments from the Inlet Cove community.
3. *Shifted Southern Bypass Alignment closer to existing Route 1 (i.e., tightened curve) after bypassing Woodlawn Baptist Church.* This modification, shown on Sheets 5 and 6 of 6, was integrated to minimize impacts on the pastureland portion of the current Woodlawn Stables site. The modifications also include improved access to the pastureland south of Route 1 from Mount Vernon Memorial Highway.
4. *Eliminated SWM-6A in southwest quadrant of Mulligan Road/Mount Vernon Memorial Highway intersection and replaced it with SWM-6A and SWM-6B.* This modification, shown on Sheet 6 of 6, was made also to minimize impacts on the Woodlawn Plantation parcel south of Route 1.

The change in environmental impacts resulting from the revised limits of disturbance due to the modifications described in items #2-4 above is shown in **Table 1**.

Table 1. Summary of Impacts*

Category	Alternative A 6/1/12 EA	Alternative B 6/1/12 EA	Alternative B Modified	Alternative C 6/1/12 EA
Total Length of Construction Limits (miles)	0	3.65	3.66	3.62
Total Area within Limits of Disturbance (LOD) (acres)	0	109	109	111
Total New Disturbed Area (excluding existing asphalt) (acres)	0	75	73	75
Prime and Unique Farmland (acres)	0	37.7	36.5	35.4
Forest (acres)	0	7.9	9.1	5.4
Section 4(f) Property Use (resources / acres)	0	4 / 33.3	4/32.3	4 / 36.8
Estimated Length of Streams Impacted (linear feet)**	0	1,526	2,469	1,451
Estimated Wetlands Displaced (acres) **	0	2.6	1.3	2.5
Floodplains Crossed (acres)	0	4.9	5.1	4.5
Resource Protection Areas (acres)	0	13	12	13

*The values for Alternatives A, B, and C were originally presented in Table 4 of the June 1, 2012 EA. Only those categories for which impacts have changed as a result of design modifications to Alternative B are repeated herein. Revised values are highlighted in the shaded cells.

**Estimated Length of Streams Impacted and Estimated Wetlands Displaced for Alternative B Modified computed using Wetlands Studies and Solutions, Inc. (WSSI) GIS files from the Wetland Delineation Survey completed in October 2012 (see Section 4.2). The impacts reported for Alternatives B and C in the June 1, 2012 EA were calculated using Fort Belvoir's GIS databases.

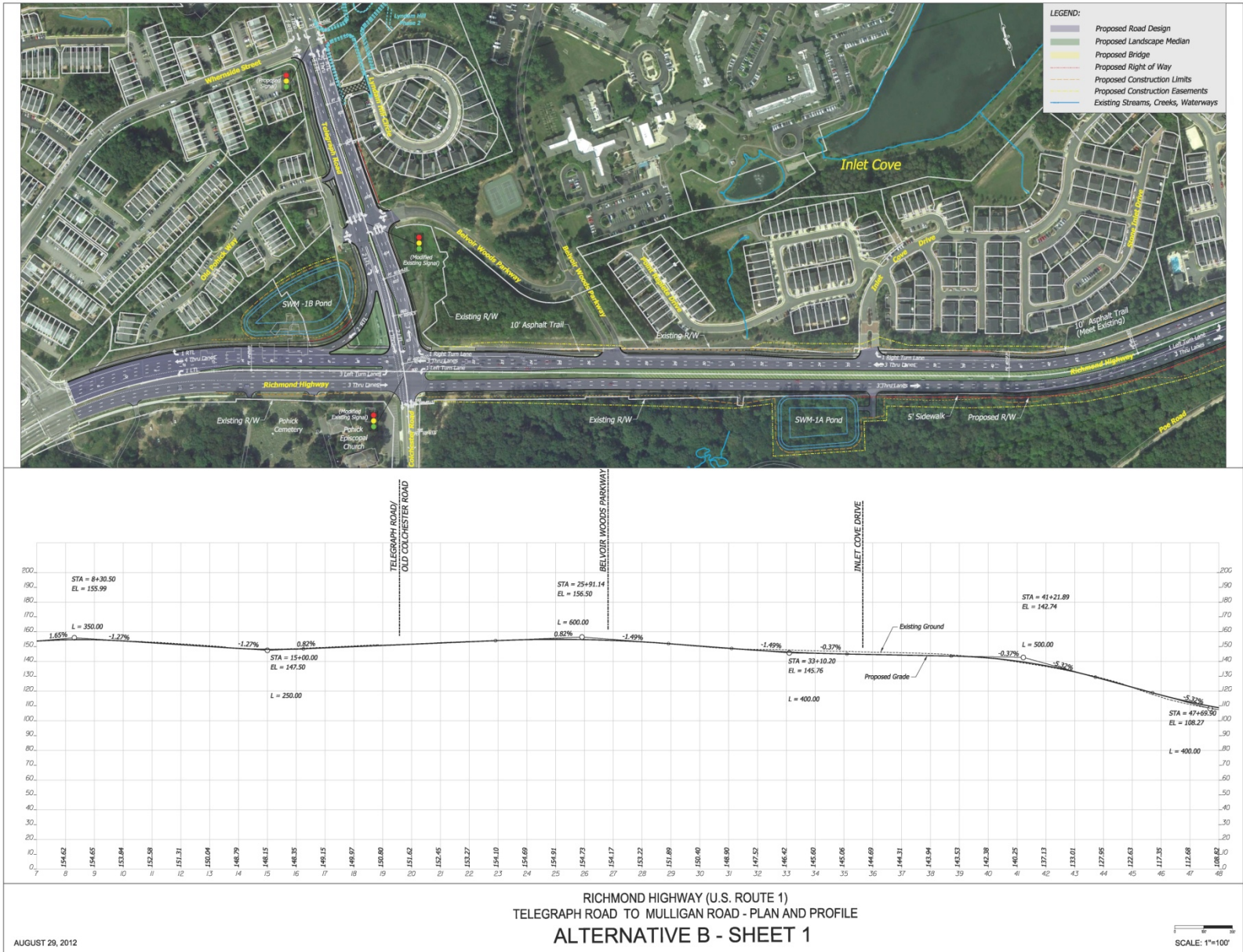


Figure 1. Alternative B Modified
(Sheet 1 of 6)

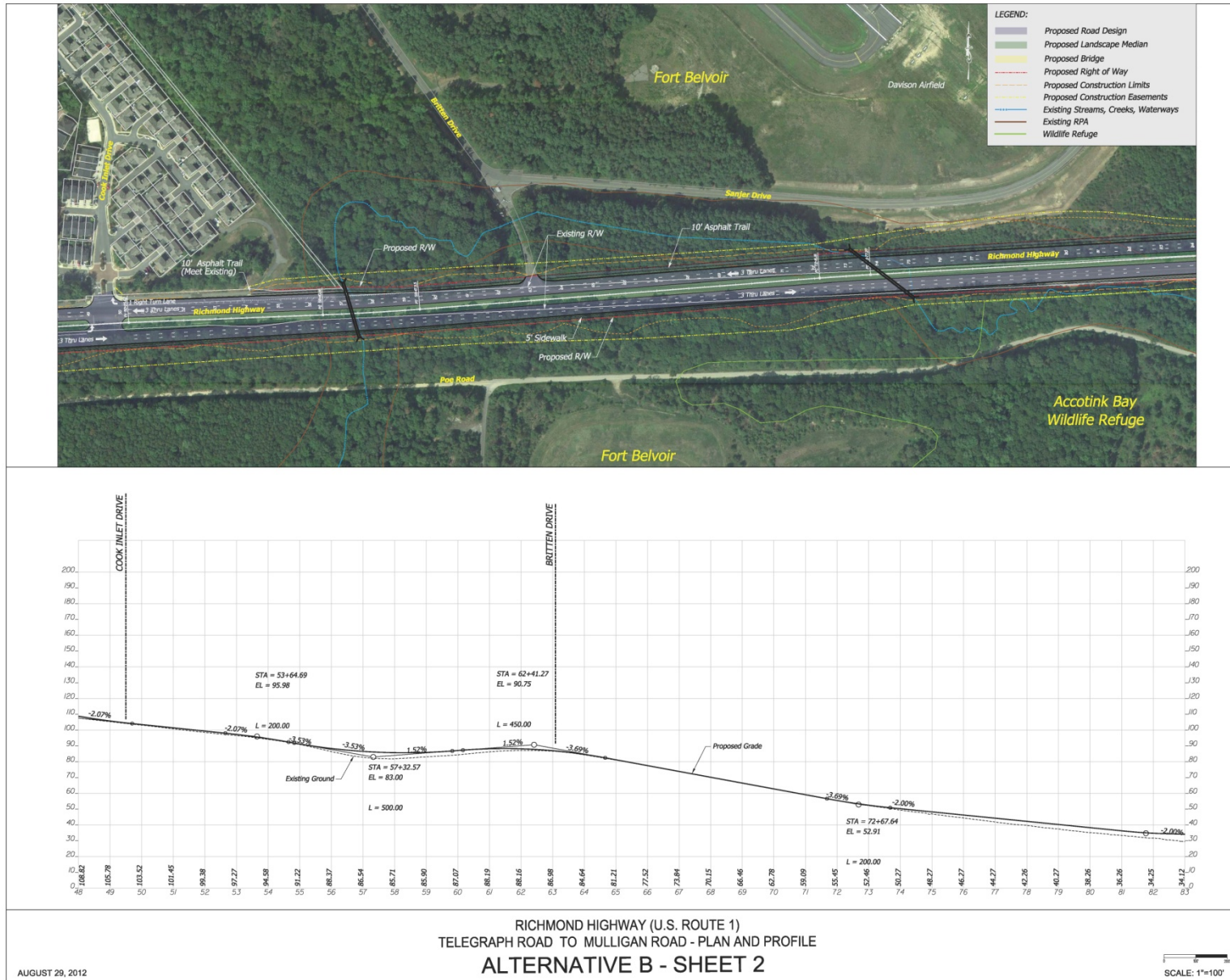


Figure 1. Alternative B Modified
(Sheet 2 of 6)

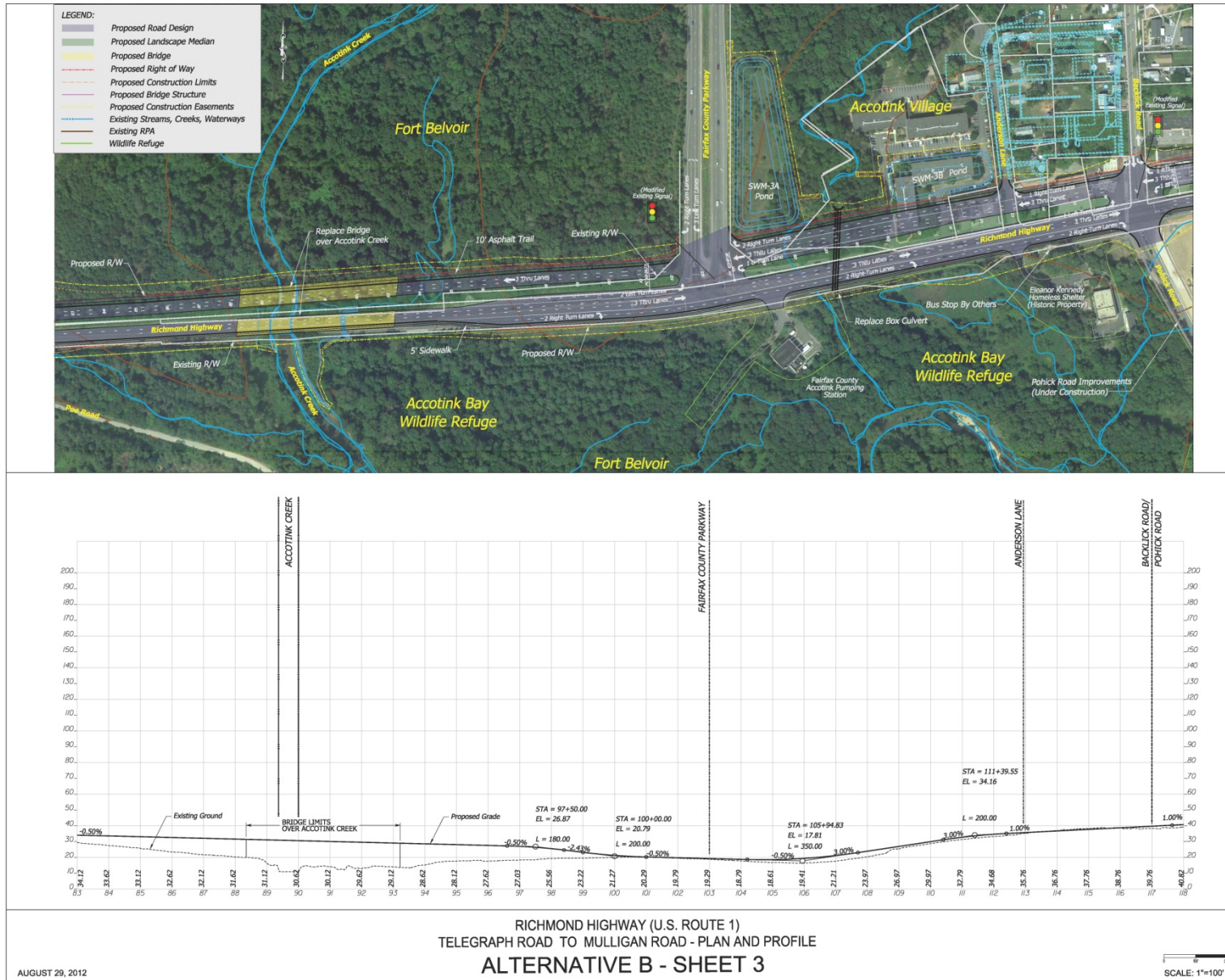


Figure 1. Alternative B Modified (Sheet 3 of 6)

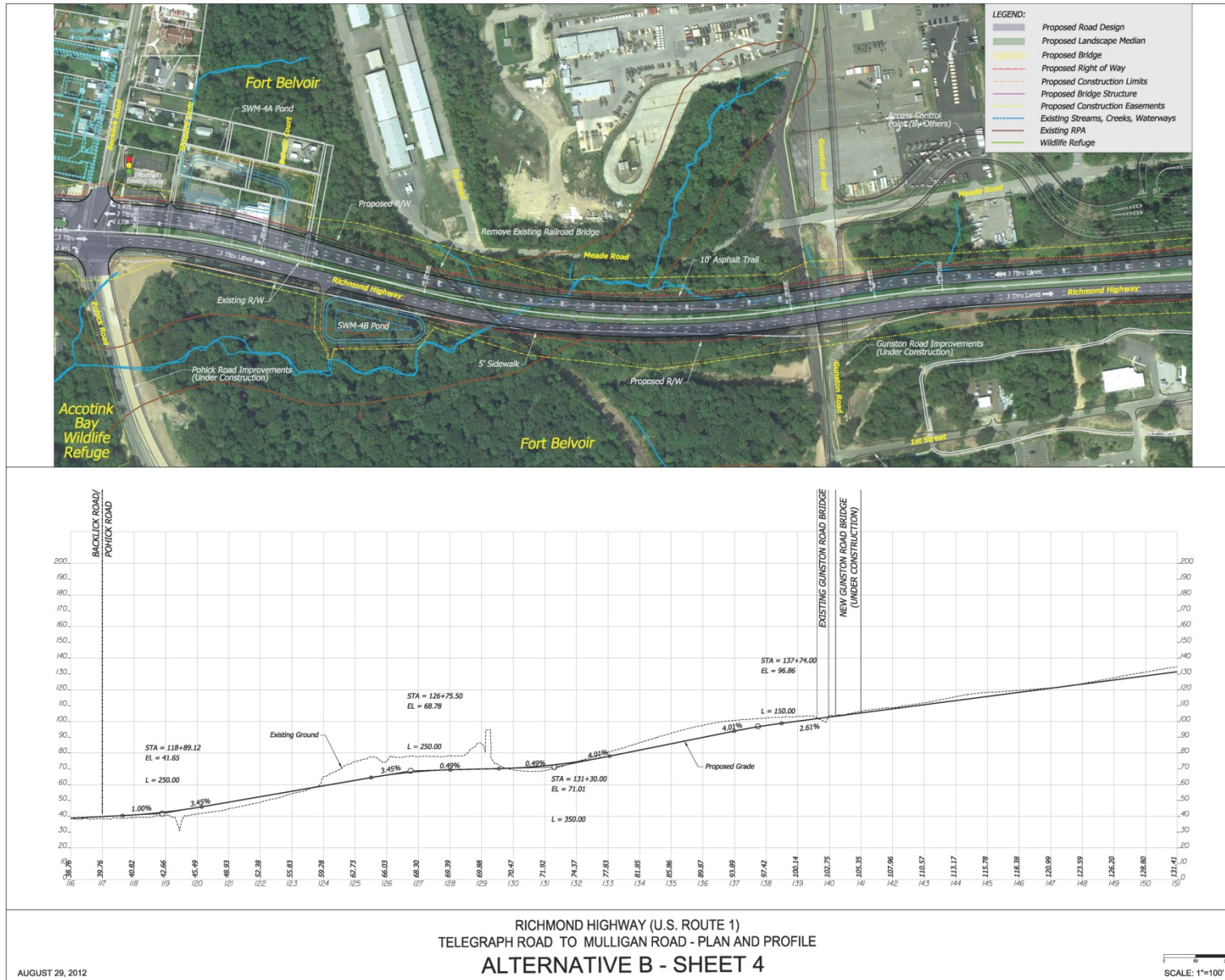


Figure 1. Alternative B Modified
(Sheet 4 of 6)

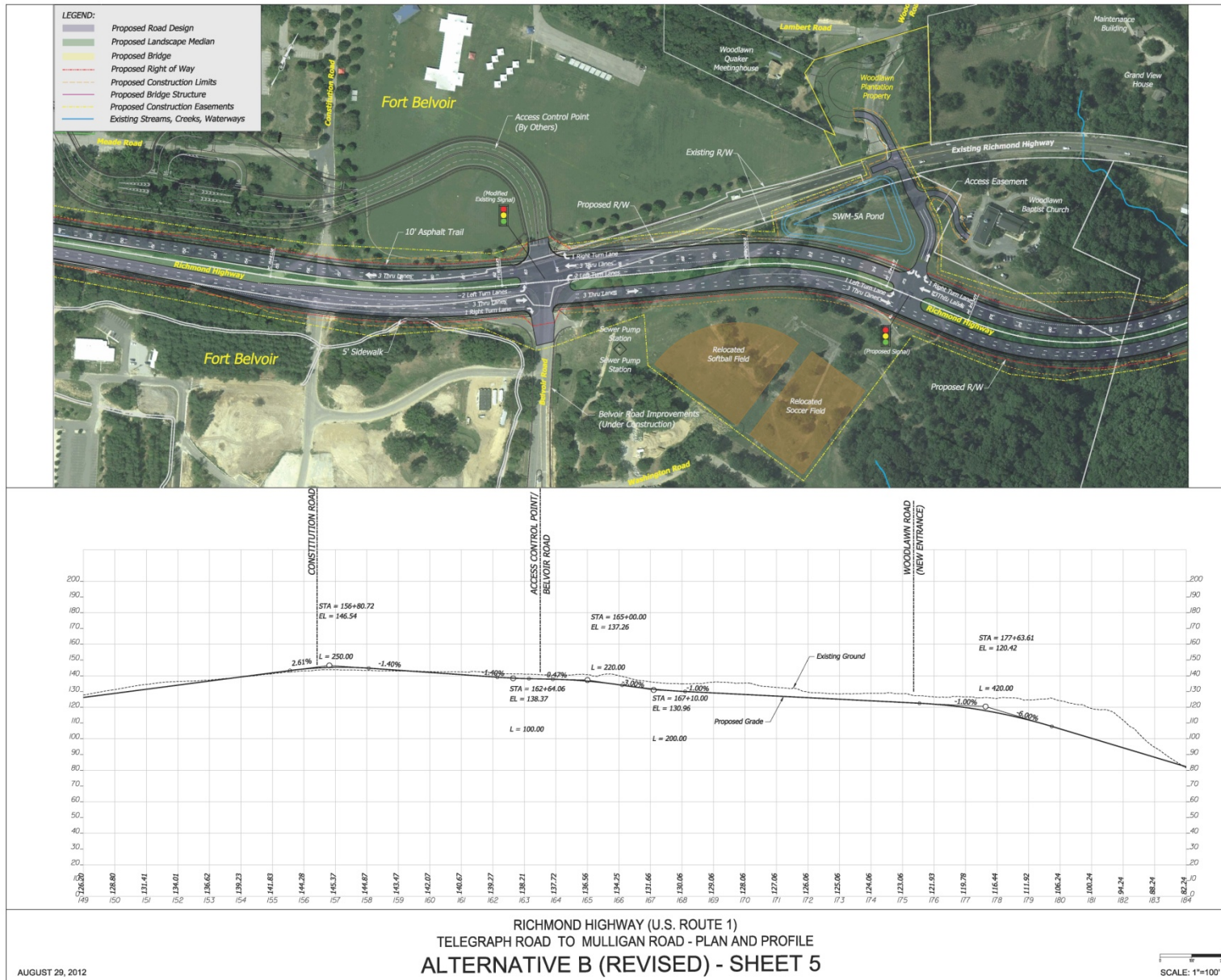
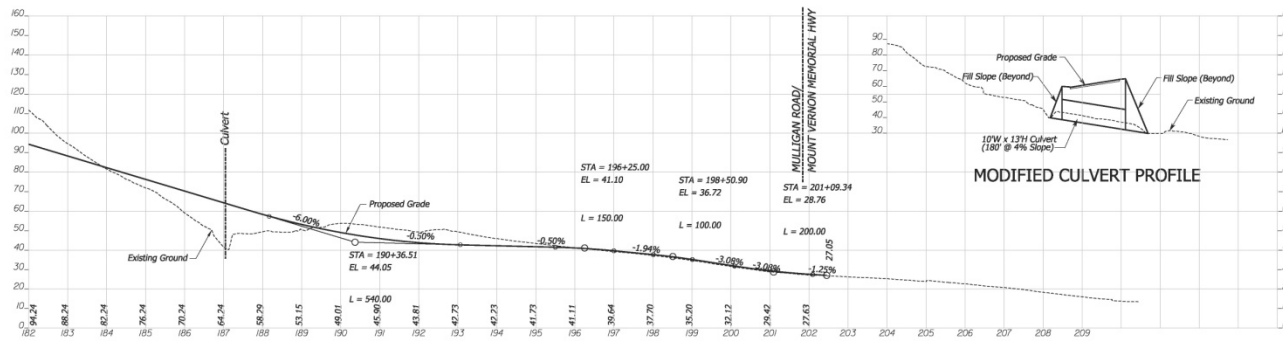


Figure 1. Alternative B Modified (Sheet 5 of 6)



RICHMOND HIGHWAY (U.S. ROUTE 1)
 TELEGRAPH ROAD TO MULLIGAN ROAD - PLAN AND PROFILE
 ALTERNATIVE B (REVISED) - SHEET 6

AUGUST 29, 2012

SCALE: 1"=100'

Figure 1. Alternative B Modified
 (Sheet 6 of 6)

As described in modification #3 above, the Southern Bypass Alignment has been shifted to minimize impacts to the property on which Woodlawn Stables currently operates. In addition, since the completion of the June 1, 2012 EA, conceptual designs for the reconfiguration of the property in order to continue equestrian operations, including new access to the site from Mount Vernon Memorial Highway, have been developed by an equestrian consultant in cooperation with the National Trust for Historic Preservation (NTHP), the owners of the property, and Save Woodlawn Stables, an interested party. One such design is shown in **Figure 2**. Any decisions on the ultimate configuration of the property and any use or redevelopment on the property outside roadway right-of-way would be made further along in the design process.

As shown in Figure 1, Sheet 6 of 6, the realigned portion of Route 1 would go through the two non-historic structures utilized by the Woodlawn Stables commercial equestrian facility (the four historic structure to the west of the realigned roadway would not be physically impacted).

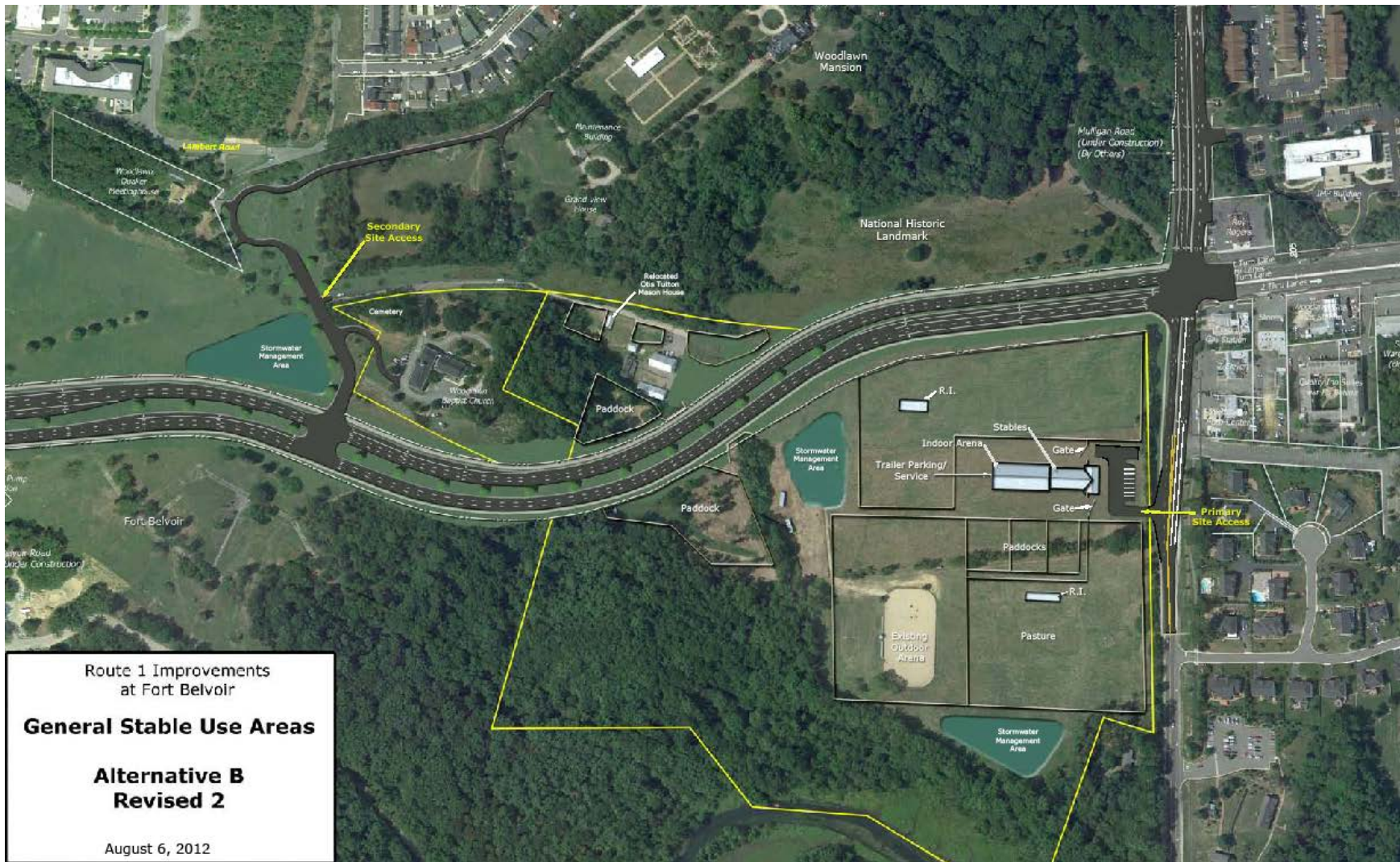


Figure 2. Conceptual Proposal for Redevelopment of General Stable Use Areas

2. FINAL SECTION 4(F) EVALUATION

Section 4(f) resources were identified along the Route 1 corridor within the project area and include two wildlife refuge or refuge-like properties that would be impacted by the project:

- Accotink Bay Wildlife Refuge
- Fort Belvoir Forest and Wildlife Corridor

Additionally, two historic sites would be impacted by the project:

- Fort Belvoir Military Railroad (including the Fort Belvoir Facility No. 1433 Railroad Bridge)
- Woodlawn Historic District (including the Woodlawn National Historic Landmark and Sharpe Stable Complex)

Accordingly, these four properties meet the criteria for protection under Section 4(f) and would be “used” by Alternative B or C and are therefore addressed in the Section 4(f) Evaluation.

The Final Section 4(f) Evaluation is included as **Attachment 1**. This version incorporates Alternative B Modified and specific comments received on the Draft Section 4(f) Evaluation from the National Trust for Historic Preservation (July 6, 2012) and the Department of the Interior (August 8, 2012).

3. UPDATE ON SECTION 106 ACTIVITIES

3.1 Consulting Parties Meeting

A seventh consulting parties meeting was held on July 31, 2012 to provide an overview of activities that have taken place since project inception; review alternatives (including those that were dismissed early in the process); review changes that were made to Alternative B in response to comments received during the comment period for the June 1, 2012 EA and the June 5, 2012 Public Meeting; provide an update on ongoing cultural resources reports/surveys; and inform the group about recent coordination with the State Historic Preservation Office (SHPO) (see Section 3.2).

With respect to ongoing reports and surveys, FHWA reported that drafts of the architectural and archaeological reports and the Woodlawn Baptist Church Cemetery Survey (see Section 4.5) were complete and undergoing review and revision based on comments received from consulting parties. It was also reported that documentation of the Fort Belvoir Military Railroad Bridge was ongoing; an archaeological survey of the entire NTHP property to update the survey conducted by the Chicora Foundation, Inc. in 1999 is imminent; and Accotink Village archaeological surveys would be completed during construction.

The Advisory Council on Historic Preservation (ACHP) declined to participate as a consulting party when originally invited at the onset of the project. In response to requests from Congressman James P. Moran and consulting parties, the ACHP sent a letter to FHWA on June 18, 2012 agreeing to participate in consultation to develop a Programmatic Agreement for the Route 1 project.

3.2 Coordination with the State Historic Preservation Office

On August 14, 2012, FHWA sent to the Virginia Department of Historic Resources (VDHR) the following correspondence:

- Request for Concurrence with Areas of Potential Effect (APE)
- Request for Concurrence with Determinations of Eligibility for Architectural Properties
- Request for Concurrence with Determinations of Effect on Architectural Properties
- Request for Concurrence with Determinations of Eligibility and Effect on Archaeological Properties

VDHR concurrence with the findings and determinations in each of these four letters was received on August 30, 2012. The signed concurrence letters are included as **Attachment 2**.

3.3 Programmatic Agreement

The Final Programmatic Agreement (PA) for the Route 1 Improvements Project is included as **Attachment 3**. A summary of the historic properties within the architectural APE, as well as impacts and mitigation included in the PA for these impacts, is provided in **Table 2** (this table is an updated version of Table 7-1 from the June 1, 2012 EA). **Table 3** (an update to Table 7-2 from the June 1, 2012 EA) lists the archaeological resources identified within the archaeological APE, along with potential impacts and the mitigation included in the PA for these impacts.

Table 2. Summary of Mitigation for Historic Properties within the Architectural APE

Resource	NRHP/NHL Status	Impacts Under Alternative B and B Modified	Impacts Under Alternative C	Mitigation Included in the Programmatic Agreement for Alternative B Modified ¹
<p>Woodlawn National Register-Eligible Historic District</p> <p><i>VDHR # 029-5181</i></p>	<p>NRHP eligible</p>	<p>Alteration of the viewshed; visual and auditory impacts; changes in relationship among the contributing properties; physical destruction of a portion of the historic landscape for a road and stormwater management infrastructure; relocation of the two non-historic Woodlawn Stables structures to another location within the Historic District; physical relocation of Otis T. Mason House; and changes in land use and circulation patterns.</p>	<p>Visual and auditory impacts; physical destruction of a portion of the historic landscape for widening of existing road and stormwater management infrastructure; physical relocation of Grand View House; exhumation and relocation of graves within Woodlawn Baptist Church cemetery.</p>	<ul style="list-style-type: none"> • FHWA would facilitate design workshops among VDOT, Fairfax County, the Army, the SHPO, the Trust, Woodlawn Baptist Church, and Friends to evaluate alternative designs for proposed reduction of adverse effects to specific contributing properties and to the District as a whole. Features to be discussed would include, but are not be limited to: <ul style="list-style-type: none"> ○ A shared-use driveway, a portion of which will be controlled and maintained by VDOT, providing access to the Trust, Woodlawn Baptist Church, and Woodlawn Quaker Meetinghouse. ○ Construction of a signalized intersection at Woodlawn Road to provide safe access to the Trust, Woodlawn Baptist Church, and Woodlawn Quaker Meetinghouse properties within Woodlawn Historic District. ○ Landscaping needed to rehabilitate the setting, screen and reduce the visibility of the highway, and maintain viewsheds, to the greatest extent possible, for all Woodlawn Historic District properties, including plantings within and outside VDOT right-of-way. ○ Circulation patterns within the District, including vehicular, pedestrian, and equestrian access, including portions of the Potomac Heritage National Scenic Trail and the Washington-Rochambeau Revolutionary Route National Historic Trail, and the abandoned section of Route 1. ○ Fabrication and installation of interpretive signage related to the District and its contributing properties. ○ Reducing the width of the roadway section, reducing the impacts of the new road construction, and determining future usage of the section of the existing Route 1 corridor that may be abandoned. ○ Re-establishment of appropriately designed fencing on Trust property. ○ Location and design of stormwater management ponds or drainage areas that minimize the total disturbance of natural vegetation and soil within the boundaries and viewshed of the Woodlawn Historic District so as to minimize adverse effects. ○ Design of “gateway” features and elements, at the boundaries of and within the Woodlawn Historic District, to create a context-sensitive setting that is distinctive from other non-historic portions of Route 1 and Mount Vernon Memorial Highway. Gateway features shall include, but not be limited to, landscaping, lighting, the size and location of sidewalks, trails, fences, and signs. ○ Proposals for the relocation of the Otis Mason House and possible relocation of the non-historic Woodlawn Stables commercial equestrian facility. If equestrian-related structures are not relocated on Trust property, proposals for an appropriate driveway entrance from Mount Vernon Memorial Highway to the NTHP property south of Route 1 will be discussed. ○ The appropriateness and feasibility of sound abatement measures, if such measures are requested by qualifying landowners.

¹ Mitigation measures included in the Final Programmatic Agreement dated November 19, 2012.

Resource	NRHP/NHL Status	Impacts Under Alternative B and B Modified	Impacts Under Alternative C	Mitigation Included in the Programmatic Agreement for Alternative B Modified ¹
				<ul style="list-style-type: none"> • In an effort to minimize the adverse effects of the Undertaking on the Woodlawn Historic District, consistent with Section 4(f) of the Department of Transportation Act, NEPA, and NHPA, to enhance the experience of visiting and traveling through the Woodlawn Historic District, and to provide a safer environment for motorists, pedestrians, and cyclists, FHWA, VDOT, and the County shall work together, in consultation with the SHPO, the Trust, and other parties to the Programmatic Agreement, to reduce the width of the right-of-way and roadway section to the maximum extent possible through the Woodlawn Historic District. • FHWA would prepare a draft NRHP nomination for the Woodlawn Historic District. • FHWA would complete draft SHPO Intensive Level Survey for the following properties contributing to the District: 1. Sharpe Stables Complex (Dairy, Corncrib, Stable, and Bank Barn); 2. Grand View. • FHWA would complete measured drawings of the following individually listed or eligible properties within the District: 1. Woodlawn Quaker Meetinghouse; 2. Pope-Leighey House; 3. George Washington's Grist Mill.
<p>Woodlawn Plantation</p> <p>VDHR # 029-0056</p>	<p>NHL/NRHP listed</p>	<p>Taking of Woodlawn Plantation property; physical destruction of a portion of the historic landscape for a road and stormwater management infrastructure; changes in land use and access between different parts of the property; alteration of the viewshed; auditory impacts; and cumulative impacts from the construction of the proposed project and the widening of Old Mill Road in combination with the Mulligan Road construction project.</p>	<p>Taking of Woodlawn Plantation property; physical destruction of a portion of the historic landscape for widening of existing road and stormwater management infrastructure; visual and auditory impacts; and cumulative impacts from the construction of the proposed project and the widening of Old Mill Road in combination with the Mulligan Road construction project.</p>	<ul style="list-style-type: none"> • FHWA would provide and oversee the distribution of project funding to mitigate for impacts to Woodlawn NHL. These mitigation measures are directly relevant to the adverse effects of the project on the Trust's ability to manage and maintain this historic property, and to the adverse effects of the project on the experience of visitors to the site. These mitigations are provided to benefit any structure or landscape within the NHL boundaries including the Woodlawn Plantation, Grand View, and Pope-Leighey House. The following is a list of mitigation measures that will be provided within the boundaries of Woodlawn NHL: <ul style="list-style-type: none"> ○ Water and sewer service to serve the property for regular operations and safety. ○ Installation of natural gas service. ○ Installation of a sanitary sewer service line sufficient to serve the Woodlawn property. • FHWA would install an underpass beneath Route 1 adjacent to the Sharpe Stable Complex in order to restore access to the pastureland associated the Sharpe Stable Complex buildings that would otherwise be diminished due to the Undertaking. The underpass would be built to allow limited farm equipment and vehicular access between the NHL and remainder of the Woodlawn property that is listed on the National Register of Historic Places. FHWA would also provide an appropriate driveway entrance from Mount Vernon Memorial to the Trust pastureland.

Resource	NRHP/NHL Status	Impacts Under Alternative B and B Modified	Impacts Under Alternative C	Mitigation Included in the Programmatic Agreement for Alternative B Modified ¹
Pope-Leighey House VDHR # 029-0058	NRHP listed, contributing to Woodlawn Historic District	No adverse impacts.	No adverse impacts.	See mitigation for adverse impacts to Woodlawn Historic District.
Grand View VDHR # 029-0062	NRHP eligible, contributing to Woodlawn Historic District	No adverse impacts.	Physical relocation of Grand View House to another location within the Woodlawn Historic District.	See mitigation for adverse impacts to Woodlawn Historic District.
Woodlawn Baptist Church VDHR # 0029-0070	The church building is not eligible, but the property is contained within Woodlawn Historic District	See adverse effects to Woodlawn Historic District.	See adverse effects to Woodlawn Historic District.	<ul style="list-style-type: none"> • FHWA would facilitate discussions for the granting of an easement from the Army to the Church allowing limited usage of the land on Fort Belvoir located adjacent to the church and bounded by the realigned Route 1 and new access road. • Removal of pavement from the church's existing driveway to restore historic character. • Landscaping. • Documentation of the cemetery and a grave location survey (Grave Marker Assessment and Ground Penetrating Radar Survey of the Woodlawn Baptist Church Cemetery, May 2012). • Additional activities impacting the Woodlawn Baptist Church, including the relocation of church signs and relocation/replacement of utilities. Noise abatement and other details will be determined separately from this Agreement by FHWA, the Woodlawn Baptist Church, and other parties, as appropriate to the specific activity.
George Washington's Distillery and Grist Mill VDHR # 029-0330	NRHP listed, contributing to Woodlawn Historic District	No adverse impacts.	No adverse impacts.	See mitigation for adverse impacts to Woodlawn Historic District.
Otis Tufton Mason House VDHR # 029-5181-0006	Contributing to Woodlawn Historic District	The realigned portion of Route 1 would go through the property.	No adverse impacts.	<ul style="list-style-type: none"> • Relocation of the house according to Virginia Department of Historic Resources guidelines for moving historic buildings. • FHWA would ensure that Consulting Parties have the opportunity to provide input regarding the proposed relocation site, including site improvements such as access and parking area, during the design workshops described in the mitigation for adverse impacts to Woodlawn Historic District.

Resource	NRHP/NHL Status	Impacts Under Alternative B and B Modified	Impacts Under Alternative C	Mitigation Included in the Programmatic Agreement for Alternative B Modified ¹
Sharpe Stable Complex Bank Barn VDHR # 029-5181-0005	NRHP eligible	Changes in land use would impact the historic setting of the barn; visual and auditory impacts.	Visual and auditory impacts as widened roadway would be located closer to structures in complex.	See mitigation for adverse impacts to Woodlawn Historic District.
Sharpe Stable Complex Dairy, Corncrib and Stable VDHR # 029-5181-0005	Contributing to Woodlawn Historic District	Changes in land use that will impact the historic setting; modification of access to pastureland associated with the agricultural use of the Sharpe Stable Complex; and visual and auditory impacts.	Visual and auditory impacts as widened roadway would be located closer to structures in complex.	See mitigation for adverse impacts to Woodlawn Historic District.
Fort Belvoir Facility No. 1433 Railroad Bridge VDHR # 029-5425	NRHP eligible	The bridge would be removed from its current location and may be permanently destroyed if a suitable recipient cannot be identified.	Same as Alternative B and B Modified.	<ul style="list-style-type: none"> • Historic American Engineering Record (HAER) Level I documentation of the bridge. • FHWA would develop a marketing plan to determine if there is a capable party willing to relocate and assume ownership of the bridge. FHWA would offer a one-time monetary incentive to ownership. If the bridge is relocated, FHWA would submit to the Army and the SHPO photographs of the bridge at its new location following its relocation and installation. • If a capable and willing party cannot be identified, FHWA would demolish the bridge, and in addition to the HAER Level I documentation described above, FHWA would update VDHR's Data Sharing System (DSS) file on the rail bridge to indicate that the bridge has been demolished and to reference the HAER Level I documentation.
Fort Belvoir Military Railroad Bed (FBMRR) VDHR # 029-5648	NRHP eligible	The portion of the railroad bed within the limits of construction will be physically altered and destroyed.	Same as Alternative B and B Modified.	<ul style="list-style-type: none"> • Historic American Engineering Record (HAER) Level I documentation of the railroad bed within the APE. • Design and installation of interpretive historic markers. • Repairs to damaged sections of FBMRR track bed north of Telegraph Road.

Table 3. Summary of Mitigation for Cultural Resources within the Archaeological APE²

Resource	NRHP Status	Impacts Under Alternative B and B Modified	Impacts Under Alternative C	Mitigation Proposed in the Programmatic Agreement for Alternative B Modified¹
Woodlawn Plantation Archaeological Deposits VDHR # 44FX1146		The precise effects to these deposits cannot be determined at present. However, installation of water, sewer, and gas service that is proposed as mitigation for adverse impacts to Woodlawn Plantation has the potential to directly impact these deposits.	Same as Alternative B and B Modified.	Update and complete an archaeological survey of the entire National Trust for Historic Preservation Property (conducted by the Chicora Foundation, Inc. in 1999). This information will be used to guide the design of mitigation measures so that impacts to any significant deposits can be avoided or minimized.
Woodlawn Baptist Church Cemetery VDHR #44FX1212	Contributing to Woodlawn Historic District	No adverse impacts.	Widening of the roadway would require the exhumation and relocation of graves within the cemetery.	None.
Woodlawn Quaker Meetinghouse Cemetery VDHR #44FX1211		No adverse impacts.	No adverse impacts.	None.

² FHWA acknowledges that identification surveys have not been conducted in all portions of the APE, including the vicinity of Accotink Village and near Telegraph Road. All areas within the archaeological APE would be surveyed prior to construction in accordance with the stipulations of the Programmatic Agreement. In addition, if activities related to the implementation of the project, and having the potential to impact archaeological resources, are to occur outside the previously identified APE, FHWA would identify and evaluate archaeological properties prior to initiation of any land disturbing construction activities. If, as a result of testing, archaeological sites are identified that are eligible for listing in the National Register, a plan for their treatment would be developed in accordance with the stipulations of the Programmatic Agreement.

4. NEW SURVEYS AND UPDATED INFORMATION

4.1 Noise Impact Analysis Technical Report

The Final Noise Impact Analysis Technical Report is included as **Attachment 4**. This version incorporates comments received from the Virginia Department of Transportation on June 21, 2012.

As described in the report, noise impacts for Alternative B are predicted to occur at 45 noise sensitive sites representing 42 residences, one pool area, three areas of a cemetery, four locations of a sports area, one church, 10 open areas used for gardening, a horse stable, and five horse riding practice areas as a result of approaching or exceeding the Noise Abatement Criteria (NAC) in the design year (2040) build condition. No sites are predicted to be impacted due to substantial noise increases. For all sites studied, the existing year noise levels range from 53 to 72 dBA at outdoor human use areas and from 35 to 51 dBA for interior use areas. The design year build noise levels range from 54 to 71 dBA at outdoor human use areas and from 35 to 49 dBA for interior use areas.

Noise abatement was evaluated where future traffic noise impacts are predicted to occur. A preliminary noise evaluation was performed with a more detailed review to be completed during final design. As such, noise barriers that are determined to be feasible and reasonable during the preliminary noise analysis may not be feasible and reasonable during the final design noise analysis. Conversely, noise barriers that were not considered feasible and reasonable may meet the established criteria and be recommended for construction.

Ten barriers were evaluated and eight of them were determined to be feasible and reasonable for Alternative B. Construction activity may cause intermittent fluctuations in noise levels. During the construction phase of the project, all reasonable measures will be considered to minimize noise impact from these activities.

4.2 Waters of the U.S. (Including Wetlands) Delineation Survey

A Waters of the U.S. (Including Wetlands) Delineation Survey was completed in October 2012. The study area for the wetland delineation survey included the Route 1 corridor between Telegraph Road and Mount Vernon Memorial Highway. Wetland delineation was performed pursuant to the “Corps of Engineers Wetlands Delineation Manual,” Technical Report Y-87-1 (1987 Manual) and subsequent guidance, and modified by the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region*, Version 2.0, dated November 2010.

Because the study area consists of a linear corridor, transects were not established, and the study area was systematically searched and boundaries determined for jurisdictional wetlands and other waters of the U.S (i.e., streams and ponds). As described in the documentation, jurisdictional wetlands and other waters of the U.S. within the study area include palustrine forested (PFO) wetlands, palustrine scrub/shrub (PSS) wetlands, palustrine emergent (PEM) wetlands, palustrine open water (POW), Accotink Creek, Mason Run, unnamed tributaries to Accotink Creek, and unnamed tributaries to Dogue Creek. The impacts to these waters are summarized in Table 1 of this Memo-to-File.

4.3 Small Whorled Pogonia Habitat Evaluation and Search

The Small Whorled Pogonia (*Isotria medeoloides*) Habitat Evaluation and Search was completed in October 2012 to address the Federal Endangered Species Act general condition for the

purposes of Clean Water Act permitting. Due to its rarity, the species was listed as endangered on the federal level in 1982 (U.S. Fish and Wildlife Service, 1982). In addition, due to the apparent rarity of the small whorled pogonia in Virginia, this species was listed as state-endangered in 1985 (Terwilliger, 1991).

The study area for the evaluation and search included the Route 1 corridor between Telegraph Road and Mount Vernon Memorial Highway. The report prepared to document the study discusses the distribution and habitat associations of the small whorled pogonia, details the methodology of the habitat evaluation and search, and presents findings and conclusions. No small whorled pogonias were found during the survey of the study area. “High-quality” and “Medium-quality” habitat for this species is present within the study area, but a thorough search of the study area detected no individuals. Given the intensity with which the highest quality areas were searched and the systematic nature of the search for this species (i.e., investigating all “high-quality”, “medium-quality”, and some “low-quality” habitat areas as well), it was concluded that there is a low probability that this species occurs within the study area, based on the negative search results and largely unfavorable habitat parameters for the small whorled pogonia within the study area.

A copy of the report will be included as supplemental information to the wetlands permit application to document that adverse impacts to the small whorled pogonia are not anticipated to occur as a result of the development of this site.

4.4 Phase I & II Environmental Site Assessment Reports

A *Phase I Environmental Site Assessment* (ESA) was completed in September 2012 to identify any Recognized Environmental Conditions (REC) located on or near the proposed areas of road construction or improvement activities. The approximate boundaries of the ESA extended along Route 1 from Telegraph Road to the west and Mount Vernon Memorial Highway to the east. South of Route 1 are several former or operational training ranges associated with Fort Belvoir, and Fort Belvoir’s Cullum Woods and Poe Road landfills are also located between 200 and 400 feet south of the current Route 1 alignment.

RECs are defined by the American Society for Testing and Materials (ASTM) *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*, Designation E1527-05 as follows:

The presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release or a material threat of release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater or surface water on the property.

Selected parcels with RECs in/near the planning corridor were identified as Sites of Potential Concern (SOPC). Identifying such concerns prior to final construction provides FHWA with a basis for modifying the project to reduce liability or delays. Identification of RECs within the project corridor also provides a basis for anticipation of unexpected costs associated with the management of regulated materials during construction. The RECs were compared to proposed construction plans and a subsurface investigation plan was developed. This plan was designed to characterize subsurface conditions near the SOPCs that will likely be encountered during construction activities.

The Phase I ESA research and site inspections identified nine RECs, which are summarized below in **Table 4**. Of these nine sites, the five presented in bold lettering were recognized as SOPCs that merit additional investigation due to their proximity to the project corridor.

Table 4. Summary of RECs

Site Name	Location	Recognized Environmental Condition	Site of Potential Concern	Potential Impact	Upgradient / Downgradient	Construction Activity in Vicinity
Texaco	8851 Richmond Highway	LUST site	No	Minimal: outside project corridor, characterized with prior Phase II study.	Downgradient	NA
Exxon	8861 Richmond Highway	LUST site	No	Minimal: outside project corridor, characterized with prior Phase II study	Downgradient	NA
Woodlawn Auto	5634 Mount Vernon Parkway	LUST site	No	Minimal: outside project corridor.	Downgradient	NA
Building 1974	Meade & Iry Roads	LUST site	Yes	Petroleum in soil/groundwater	Upgradient, adjacent to project corridor.	Road Widening
Village Apartments	9140 Richmond Highway	LUST site	Yes	Petroleum in soil/groundwater	Within Project Corridor	Travel lane construction, adjacent to proposed stormwater pond
Route 1 (Richmond Highway) & Telegraph Road	Northwest Corner	LUST site	Yes	Petroleum in soil/groundwater	Within Project Corridor	Turn-lane, median construction
Hess Station	9142 Richmond Highway	LUST site	Yes	Petroleum in soil/groundwater	Within Project Corridor	Travel lane construction
Route 1 Gas & Go	9120 Richmond Highway	UST site	Yes	Petroleum in soil/groundwater	Within Project Corridor	Travel lane construction, adjacent to proposed stormwater pond
Fort Belvoir CWSL & SWMUs	South of Richmond Highway	Landfill sites	No	Minima: Outside the project corridor, characterized by prior studies	Upgradient	Travel lane and bridge construction

UST/LUST: Underground Storage Tank/Leaking Underground Storage Tank.

Source: Limited Phase I Environmental Site Assessment Report, Marshall Miller & Associates, Inc., September 2012.

Subsequent to the Phase I report, a *Phase II Environmental Site Assessment Report* was completed in October 2012. In this investigation, boreholes were established to investigate potential subsurface impacts for the five SOPCs identified in the Phase I ESA as well as for the land parcels identified as “total takes” within the current limits of disturbance. A total of 22 soil samples were taken during the course of the investigation. In addition, groundwater was encountered in three of the ten boreholes that were advanced in an attempt to collect a groundwater sample.

The following conclusions were drawn from the findings:

- Two sites within the current projected limits of disturbance contain active UST systems (Route 1 Gas & Go and Hess).
- Of the 22 soil samples submitted for analysis, only one contained detectable concentrations of total petroleum hydrocarbons (TPH). This sample was collected from a

borehole located south of the UST system at the Route 1 Gas & Go. The reported concentration of the sample does not exceed the Virginia Department of Environmental Quality cleanfill limit.

- Of the three groundwater samples submitted for analysis, two contained TPH concentrations greater than the VDEQ reporting limit of 1 mg/L when removing underground storage tanks.

The following recommendations were made based on the findings above:

- The current proposed alignment of the improvements place travel lanes in areas now occupied by UST basins and dispensing systems. Should the tanks require removal due to planned construction activities, it is recommended that a soil management plan be developed prior to removal activities. All soils encountered should be managed or disposed of in a manner that satisfies the Virginia Solid Waste Management Regulations (VSWMR) 9 VAC20-80-700 and VDOT guidance documents.
- Should proposed construction activities in the vicinity of the five SOPCs identified in Table 4 extend to the depth at which the groundwater was encountered, it may be necessary to characterize and manage any groundwater discharged from dewatering of excavations at these locations. Groundwater analytical data indicate the presence of dissolved phase petroleum hydrocarbons at the Route 1 Gas and Go and the Village Apartments site. Groundwater was not encountered at the Hess Station and remains uncharacterized.

4.5 Grave Marker Assessment and Ground Penetrating Radar Survey of the Woodlawn Baptist Church Cemetery

A detailed grave marker assessment and ground penetrating radar (GPR) survey of the Woodlawn Baptist Church cemetery was completed in May 2012. The survey included archival research to develop a history of the cemetery. During the grave marker assessment portion of the survey, 133 unique grave markers representing 179 individuals were documented, with many of the markers commemorating multiple individuals. Formal markers indicate a period of use from the 1870s to the 1990s. No burials were documented from the 2000s.

As documented in the report, the GPR results correlated well with the number of graves identified during the marker inventory and suggested that there are few unmarked graves present. The GPR results indicated approximately 176 potential graves, including those associated with existing markers, as well as probable unmarked graves. The total number of graves within the cemetery, as indicated from marker data and GPR, is estimated between 176 and 179.

5. INDIRECT AND CUMULATIVE IMPACTS

5.1 Indirect Effects

Indirect effects are caused by the action and are later in time or farther removed in distance, but still are reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems. (40 CFR § 1508.8). The most common indirect effects associated with highway projects have to do with induced development, that is, development and the impacts of such development that would not otherwise occur, or that would not occur in the same timeframe, if the project were not constructed.

The influence of transportation decisions on development is a complex relationship that is dependent upon a number of factors. This is especially true for a project like this one involving an existing roadway with numerous connections to an existing transportation network within a suburban area that already is substantially developed. It is commonly accepted that new transportation facilities and transportation improvements in general can trigger development or create pressures that lead to land use changes favorable to development, which in turn can have an impact on the environment. Indeed, some transportation projects are developed with the intent of spurring economic development or to support a specific land use decision made at the local level. However, an improved transportation system does not guarantee that development will occur, because land use decisions and growth pressures are not strictly a transportation issue. Recent studies reinforce this idea by supporting the concept that the association between road construction and urbanization has been historically over-stated and that roads, at best, are an inefficient means for inducing or encouraging development in the absence of a combination of other necessary development factors and that major road improvements appear to “accommodate, rather than spur, growth.”³ At the direction of Congress, FHWA completed the *Economic Development Highways Initiative*, which reached a similar conclusion, validating the premise that highway improvements are a necessary but not sufficient condition for capturing economic growth potential. Accordingly, roadways are but one factor that influence land use and development decisions. Other factors influencing such decisions include economic conditions, extent of other ongoing development in the area, regulatory restrictions and guidance imposed by local governments, availability of water and sewer services, local and regional demand for housing and services, and personal proclivities of landowners.

Discussion with representatives of Fairfax County’s Department of Planning and Zoning indicate that current and anticipated development in the area surrounding the project can be attributed, not to the proposed project, but, rather, to BRAC activities associated with Fort Belvoir or other ongoing development pressures in the corridor. This conclusion is supported by the following factors:

Fort Belvoir. The principal land uses surrounding the project are comprised of military facilities within Fort Belvoir. Fort Belvoir’s Main Post encompasses approximately 7,700 acres between Telegraph Road and Mount Vernon Memorial Highway (the project termini), and between the Potomac River and Telegraph Road. The impetus of recent development activities at Fort Belvoir was recommendations by the Defense Base Closure and Realignment Commission

³ Hartgen, David. 2003. *Highways and Sprawl in North Carolina*. Hartgen, David. 2003. *The Impact of Highways and other Major Road Improvements on Urban Growth in Ohio*.

(BRAC Commission). On September 8, 2005, the BRAC Commission recommended that certain realignment actions occur at Fort Belvoir, Virginia. The recommendations were approved by the President on September 15, 2005, and forwarded to Congress. Upon expiration of the statutory period for Congress to enact a joint resolution of disapproval on November 9, 2005, the recommendations became law and were required to be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended. The BRAC Commission recommendations involved relocations of specified military organizations and activities to the Post, which were substantially completed by September 2011. For remaining undeveloped lands on Fort Belvoir, the Department of the Army dictates land use policies and development decisions, not the local government or private developers. Furthermore, land uses on the Post are subject to provisions of the Fort Belvoir Master Plan. The Master Plan incorporates a short-range component (next five years) and a long-range component (through 2030). The BRAC FEIS indicated that, in addition to the 20 BRAC-related projects, the Army foresees there being another 32 projects at Fort Belvoir that range from small-scale projects involving only renovations of existing buildings to large projects involving the construction of new sizeable structures. Chief among this latter category would be proposals such as the National Museum of the U.S. Army and associated Museum Support Center, the expansion of the Information Dominance Center, and a potential Army Reserve complex. The numerous smaller projects would occur on-post as new facilities or, in several instances, as renovations of existing facilities. There are no indications that any of the short-term or long-term projects on Fort Belvoir lands can be attributed to the widening of Route 1. In fact, the reverse is true, the widening of Route 1 is necessary, in part, due to the influx of residents and employees associated with the Fort Belvoir BRAC developments, as described in the Purpose and Need section of the EA.

Fairfax County Comprehensive Plan. With regard to future development outside the boundaries of Fort Belvoir, the stimulus for most such development is, again, not the widening of Route 1, but the BRAC activities at Fort Belvoir and other ongoing development in the corridor. For example, some of the thousands of employees relocating to the new hospital and other developments at Fort Belvoir may also relocate residence to the vicinity of Fort Belvoir. With more people living in the surrounding area or visiting the area daily, commercial services may also come to the area to serve the growing population and workforce. Additionally, it could be expected that contractors may establish offices in the area to serve their military clients that are relocating to Fort Belvoir. Even before the initiation of BRAC at Fort Belvoir, residential and commercial development had been going on for decades in the region surrounding the Route 1 corridor.

The Comprehensive Plan for Fairfax County is used as a guide in decision-making about the built and natural environment by the county's Board of Supervisors and other agencies, such as the Planning Commission and the Board of Zoning Appeals. It is also a guide for County staff and the public to use in the planning process. In concert with the County's zoning ordinance, the Comprehensive Plan dictates the locations and scope of any new developments in the county. The Comprehensive Plan divides the county into planning districts.

The Lower Potomac District encompasses Fort Belvoir and portions of the county south and west to the Prince William County Line. The Mount Vernon District stretches north and east along the Potomac River to the City of Alexandria. The "Concept for Future Development Map" (the Map) adopted June 19, 2012 by the Fairfax County Board of Supervisors as part of the Comprehensive Plan recognizes Fort Belvoir land as "large institutional use." The Map indicates

that the portion of the Lower Potomac District south and east of Route 1 is slated for low density residential development; areas along Route 1 and Telegraph Road are planned for “suburban center” development; and areas to the north and west of Route 1 are planned for “suburban neighborhood development. The nonmilitary area known as Accotink Village, on the north side of Route 1 and surrounded by Fort Belvoir, has recently (June 21, 2011) undergone a rezoning and Comprehensive Plan revision to accommodate a mixed-use redevelopment.

The Map indicates that most of the land in the Mount Vernon District is planned for suburban neighborhood uses (indeed, most of it already is developed as such, with numerous residential subdivisions). Along Route 1 are several nodes designated as “community business centers.” In fact, much of Route 1 between Mount Vernon Memorial Highway and the Capital Beltway already is lined with commercial development. To help serve the development, the Comprehensive Plan recommends several highway improvements (including the proposed project), as well as future public transit implementation: “Establish regular bus service along Richmond Highway between the Huntington Metro station and the Lorton commuter rail station, to serve the needs of residents and businesses in the vicinity of Richmond Highway. Provide paved, pull-off bus loading areas separate from the travel way, and paved and covered waiting areas within the public right-of-way along the length of Richmond Highway. Evaluate the long-term feasibility of using the median along Richmond Highway for development of a people mover, rail or bus rapid transit system.”

Based on the above, any future development and the densities and locations of such development must be consistent with Fairfax County’s Comprehensive Plan and zoning ordinance, or duly enacted revisions to those documents. Further, those documents already recognize the proposed project as an integral part of the future land use scenario envisioned by the County. Accordingly, the proposed project is unlikely to induce substantive changes in land use patterns, population density or growth rate, or related effects on air and water and other natural systems that are not already anticipated in the Comprehensive Plan.

5.2 Cumulative Impacts

Cumulative impacts result from the incremental impact of the action when added to the effects of other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. (40 CFR § 1508.7) The assessment of cumulative effects requires a review of past human actions in the study area, other current ongoing actions, and other actions that may be reasonably foreseeable in the future. The focus of this assessment is primarily on the effects of these other actions on the same resources that would be affected by the proposed project.

Status of Settlement and Development. Lands now within Fairfax County have been inhabited for more than 12,000 years. During the earliest habitation of record, the Paleo-Indian population density was very low and people lived in small, mobile bands as hunter-gatherers who collected wild foods and hunted the animals living in the cool, moist environment of the early postglacial period. By 2500 B.C., the rise in sea level had dramatically altered the Atlantic coast, creating large estuaries and tidal wetlands, which, in turn, vastly increased coastal resources such as fish and shellfish. With this environmental change came marked adaptation by human populations, with habitations along estuaries and river valleys. Still later (1200-300 B.C.), habitations tended

to become more sedentary, with intentional clearing of vegetation to permit rudimentary agriculture.

European contacts with the project area began in 1608. Land patents were issued in the 1650s and settlers began moving into the area. As the population increased, the Potomac Path was a convenient trail that settlers soon began attempting to develop into a road, which ultimately became the general corridor for much of Route 1. By the end of the eighteenth century, Fairfax County had grown from a sparsely settled rural area to an affluent colonial society with a population exceeding 12,000. During the Civil War, no major battles were fought in the county, although considerable military activity occurred. Fairfax County acted primarily as a staging ground for events in the Civil War and its location between the warring sides resulted in the virtual devastation of the county. The postwar effects were substantial. After the end of the Civil War, Fairfax County residents returned to a primarily agricultural way of life. The severely depressed local economy relied on dairying, stock and poultry farming, flour milling, and the cultivation of fruit, vegetables, and flowers. Even though the demands for these products increased with the growth of the national capital in the District of Columbia, Fairfax County remained a depressed agricultural community.

During the first two decades of the twentieth century, the Fairfax County economy began to grow. The emergence of the county as a leading dairy producer spawned the construction of better roads and rail services to enhance the business connection with Washington, D.C. By 1925, Fairfax County was the top producer of dairy products in the state and the economy was stabilizing. The federal government established the facility that was to become Fort Belvoir during this period. As Fairfax County emerged from the Depression, the agricultural economy was faltering. However, the increase of government workers employed in the war effort in 1941 led to an increase in the population of the county, and by 1945 land in Fairfax County was being appraised on its residential rather than farm value. After World War II, Fairfax continued its transformation into a major suburb of Washington, D.C. Family farms were disappearing and commercial farming and urban lifestyles were becoming more popular. During the 1940s and 1950s, the population grew from 40,900 to 98,500 residents. By the mid-1960s, Fairfax County had 454,300 residents and continued to attract newcomers. Today, with a population of more than one million, Fairfax County is the most populous and one of the most affluent counties in Virginia.

The most recent development activities in the project corridor have been associated with BRAC actions at Fort Belvoir, as described above in the indirect effects discussion. Those actions have included several large construction projects, such as the new hospital, as well as a number of smaller projects, including roadway improvements on roads that provide access to Fort Belvoir (e.g., Pohick Road and Belvoir Road).

Cumulative Effects Analysis. The cumulative impacts of past human actions are reflected in the current environmental conditions, or “affected environment,” along the project corridor. The EA presents detailed discussions of the project’s impacts to the various environmental resources along the corridor. Several other public or private developments are currently under construction in the geographic area surrounding the project (e.g., Mulligan Road). In addition, several other public or private developments known to be in the active planning stages are reasonably expected to occur in the future (e.g., the redevelopment of Accotink Village). Some of these actions, which are described in greater detail in the EA, would affect some of the same resources that would be directly impacted by the project. The time horizon for consideration of the cumulative impacts is defined by the “design year” of the project, which is 2040. The

geographic boundaries for consideration of cumulative impacts varies by resource, as described further below.

Air Quality. A detailed air quality analysis for the proposed project showed that no violations of National Ambient Air Quality Standards would occur as result of the project. Likewise, none of the other reasonably foreseeable actions in the vicinity of the project are expected to result in any localized or region-wide violations of the NAAQS. On a regional basis, air quality issues are addressed by the Metropolitan Washington Council of Governments, which coordinates planning to reduce pollutant emissions. The Transportation Planning Board (TPB) conducts transportation planning in the Washington region to ensure that projects, when considered collectively, contribute to the air quality improvement goals embodied in the Clean Air Act. A series of tests are performed with computer models that predict how much air pollution will be generated over the next 25 years by transportation facilities in the plan, and how much the air will be improved by cleaner gasoline standards and many other factors. If the resulting financially constrained long-range transportation plan (CLRP) is found by the TPB to meet regional air quality goals, federal agencies certify that the plan is "in conformity." In other words, the TPB ensures that the CLRP "conforms" to air quality improvement goals. The Route 1 project comes from a conforming CLRP, and therefore will not contribute either individually or cumulatively to significant air quality impacts.

Noise. The EA and the Noise Technical Report describe the results of detailed analysis of noise impacts of the project in the design year. The distance at which noise impacts would occur under the build condition vary from approximately 50 to 200 feet. There are no other reasonably foreseeable projects that would affect the noise receptors at which noise impacts have been identified. Accordingly, no significant cumulative noise impacts are anticipated.

Waters of the U.S., including Wetlands. As reported in the EA, approximately 1,526 linear feet of stream are located within the limits of disturbance for Alternative B. Approximately 2.6 acres of wetlands would be impacted. These impacts are largely within Accotink Creek or tributaries of Accotink Creek. With regard to Accotink Creek, the bridge to carry the widened Route 1 over the stream would be substantially longer than the existing bridge, increasing from approximately 60 feet to approximately 500 feet. A minimum of eight feet of vertical clearance would be provided at the Creek to improve hydrologic function and provide connectivity between wildlife habitats. The project would provide compensatory wetland and stream mitigation, most likely through the purchase of credits from a mitigation bank. A number of other highways cross Accotink Creek upstream of the project and other development has occurred, is occurring, or will occur within the 54-square-mile watershed. However, no credible estimate can be made of the aggregate impact of these other activities within the watershed. Notwithstanding, the Accotink Creek Watershed Management Plan adopted by Fairfax County on February 8, 2011 of watershed protection and restoration strategies to minimize further degradation of stream and wetland resources within the watershed. Considering the size of the project impacts in conjunction with the mitigation measures (longer and higher bridge plus compensatory mitigation), along with the County's efforts to protect and restore the watershed, no significant cumulative impacts to waters of the U.S. are anticipated.

Water Quality. Minor water quality impacts are expected as a result of increases in impervious pavement and vehicle pollutants. However, these impacts would be minimized by implementation and enforcement of stormwater management, erosion and sediment controls, and water quality permitting requirements under local, state, and federal laws. Other reasonably

foreseeable actions affecting the same waters likewise would be subject to the same types of control measures. Accordingly, significant cumulative effects on water quality are not anticipated.

Historic Properties. Extensive efforts have been made to minimize adverse effects to historic properties in the Route 1 corridor, as evidenced by avoidance of direct impacts to Pohick Church and the Camp Humphreys Pump Station, by alignment and design measures to minimize harm to unavoidable encroachments on elements of the Woodlawn Historic District, and by commitment to numerous mitigation measures as outlined in the Section 106 Programmatic Agreement. In terms of other actions affecting the same resources, the Mulligan Road project currently under construction required the use of land from a portion of Woodlawn Plantation. Those impacts were offset by providing replacement land and enhancement to access to the Plantation property. Similarly, the current project will provide a number of mitigation and enhancement measures to offset the adverse effects. Accordingly, significant cumulative effects on historic properties will not occur.

6. JUNE 2012 PUBLIC INFORMATION MEETING

A Public Information Meeting was held on Tuesday, June 5, 2012 from 6:00 p.m. to 8:00 p.m. in the Hayfield Secondary School cafeteria located at 7630 Telegraph Road in Fairfax County. The purpose of the meeting was to provide citizens an opportunity to review and discuss the EA and the conceptual design of proposed alternatives. Representatives of the Federal Highway Administration (FHWA), Virginia Department of Transportation (VDOT), Fairfax County, and U.S. Army Fort Belvoir were available to discuss the project and answer questions.

Display boards, maps, conceptual design drawings, the EA, and other technical reports and data pertaining to the project were available for review at the meeting. In compliance with Section 106 of the National Historic Preservation Act and 36 CFR Part 800, information concerning the potential effects on properties listed in or eligible for listing in the National Register of Historic Places was also available at the meeting.

Attendees received informational brochures describing the project, its purpose and need, and findings from the EA. An informational presentation was given by FHWA at approximately 7:00 p.m., followed by an informal citizen question-and-answer session.

Citizens were invited to provide their comments for inclusion in the meeting record through July 6, 2012 by way of:

- Preprinted comment sheets, which were designed to elicit input on the process, the alternatives, and any issues or concerns regarding the EA. These comment sheets could be filled out and either deposited in a box at the hearing or mailed to the address indicated on the sheet.
- Verbal comment at two recording stations.
- Narrative letters or emails to FHWA.

Additionally, all public hearing materials (including comment sheets) were available on FHWA's website after the meeting.

The meeting sign-in sheets indicated that at least 462 citizens were in attendance (some attendees chose not to sign the attendance sheets).

6.1 Summary of Citizen Comments

Three preprinted questions on the comment sheet were used to solicit input on the EA:

- What is your opinion of the alternatives that have been developed to address the project purpose and need?
- What information would you offer to help decision-makers select the best alternative?
- Are there other issues or concerns that you have regarding the Environmental Assessment?

A total of 180 comment sheets were submitted at the Public Information Meeting (99 sheets) and via mail or email (81 sheets). Additionally, nine oral comments were recorded at the meeting and 95 narrative comments (letters and emails) were submitted during the comment period.

The following is a brief tabular summary of the input received from citizens. Note that the totals do not exactly match the total number of responses as multiple issues were often addressed within the comment and some citizens submitted multiple comments, i.e., a comment sheet as well as narrative comments.

Alternative Preference	Number of Comments
Alternative A (No-Build)	27
Alternative B (Southern Bypass)	16
Alternative C (Widen in Place)	105
Alternative C (Widen in Place) <i>Using Land on Woodlawn Plantation Side</i>	35
Other Suggestions	39
Not Enough Alternatives Considered	17

Other Frequently Mentioned Comments	Number of Comments
Process Flawed / Not Transparent / Not Compliant	40
Do Not Impact National Historic Landmark Woodlawn Plantation or Woodlawn Historic District	14
Do Not Impact Woodlawn Baptist Church or Displace Cemetery	36
Do Not Impact Woodlawn Stables	127
Provide Bike / Pedestrian Accommodations	16
Need Transit / Preserve Right-of-Way for Transit	14

6.2 Summary of Public Official Letters

The following public officials wrote letters in support of Alternative C (Widen in Place) as the least damaging choice that will preserve the historic character of Woodlawn Plantation and protect the community asset of Woodlawn Stables:

- Representative James P. Moran
- Senators Linda Puller and Adam Ebbin; Delegates Dave Albo, Mark Sickles, and Scott Surovell
- Mount Vernon District Supervisor Gerry Hyland

Additionally, Mount Vernon District Planning Commissioner Earl Flanagan did not support any of the alternatives, but recommended that the Woodlawn Historic District be detached from the current Route 1 project and instead be attached to a future project that will widen Route 1 north of Woodlawn, after the on-going transit study is final.

6.3 Summary of Agency and Organization Comments

Detailed comments on the technical content of the EA were received from the following three agencies / organizations, as well as one local religious group (Alexandria Monthly Meeting of Religious Society of Friends) and one local public interest group (Save Woodlawn Stables):

- U.S. Army Fort Belvoir: No alternative preference specified.
- National Trust for Historic Preservation: Alternative B, the Southern Bypass, would be the less harmful Build Alternative to historic resources.
- Virginia Department of Historic Preservation: Not prepared to concur with alternatives/findings.

Additionally, general comments were received from the following local groups:

- Clifton Horse Society
- Fairfax4Horses
- Fairfax County Cemetery Preservation Association
- Grist Mill Woods Community Homeowners Association
- Lyndham Hill Homeowners Association
- Mount Vernon-Lee Chamber of Commerce
- Mount Vernon Civic Association
- Northern Virginia Coalition of Equestrian Organizations
- Spring Garden Apartments, LLLP

7. RESPONSES TO COMMENTS

Responses to comments received during the comment period for the EA and public meeting are divided into two subsections. In the first, responses are provided to the detailed comments on the technical content of the EA and Draft Section 4(f) from the following agencies and organizations:

- National Trust for Historic Preservation
- U.S. Army Fort Belvoir
- Virginia Department of Historic Resources
- Alexandria Monthly Meeting of the Religious Society of Friends
- Save Woodlawn Stables

Responses to public comments are documented in Section 7.2.

7.1 Agency and Organization Comments

National Trust for Historic Preservation

General:

Comment: NTHP's strong preference is for a no-build alternative; however, the NTHP supports the Southern Bypass Alternative. We recognize that it will not avoid historic resources altogether, but relocation of the necessary buildings would be the less harmful build alternative to the District's integrity and context, and would help to ensure its long-term preservation. We encourage FHWA to continue to refine the Southern Bypass to minimize and mitigate the impacts, such as the use of quiet pavement technology.

Response: *Comment noted.*

Comment: The Widen in Place alternative has the most harmful direct and indirect adverse effects on historic properties, and would have a devastating impact on the Woodlawn Baptist Cemetery. It is our view that the Widen in Place alternative would fail to meet the legal mandate of minimizing harm to historic properties, as set forth in Section 4(f) and Section 110(f).

Response: *Comment noted.*

Comment: Much public attention has been focused on the impact to the National Trust's tenant, Woodlawn Stables. Although construction of any alternative would disrupt operations, we believe those impacts can be minimized and mitigated through phasing of construction; an underpass; and the relocation of buildings on the site. NTHP supports all these proposals.

Response: *Comment noted.*

Comment: Public reaction suggests a strong sentiment that the property on the south side of Route 1 should be maintained as a public amenity, even though Woodlawn Stables operates as a private business. NTHP would be open to working with Fairfax County and the community to address the long-term public use of our property to the south.

Response: *Subsequent to the completion of the June 1, 2012 EA, the Southern Bypass Alignment was realigned to minimize impacts to the property on which Woodlawn Stables currently operates. In addition, conceptual designs for the possible reconfiguration of the property in order to continue equestrian operations, including new access to the site from Mount Vernon Memorial Highway, have been developed by an equestrian consultant in cooperation with the National Trust for Historic Preservation (NTHP) and Save Woodlawn Stables. One such design*

is shown in Figure 2. Any decisions on the ultimate configuration of the property and any use or redevelopment on the property outside roadway right-of-way would be made further along in the design process. The provision of design workshops to address these and other design details has been included in the Section 106 Programmatic Agreement.

Draft Section 4(f) Comments:

The following bulleted comments have been addressed in the Final Section 4(f) Evaluation (see Attachment 1).

- Page 15. Provide the date of construction for Woodlawn Plantation.
- Page 17. Provide information on the number of graves within the Woodlawn Baptist Church cemetery and the historic relationship of those who are buried in the cemetery to the historic district and greater community. Include citations to the cemetery study that FHWA conducted to locate burial sites within the cemetery.
- Page 17. Provide a statement explaining the basis for the Sharpe Stable bank barn’s significance. This section also fails to provide any context for the historic relationship of the Sharpe Stable Complex to the historic district and the National Historic Landmark.
- Page 17. The Woodlawn Quaker Meetinghouse also maintains a cemetery on its property, which should be reflected throughout this section.
- Page 19. This section indicates generally that non-contributing barns would be displaced. This section should provide specific information about what contributing and non-contributing buildings would be displaced.
- Page 26. Please note that the National Trust supports the preferred alternative, as outlined in our letter to the FHWA on June 15, 2012.

Comment: Page 19. This section fails to explain fully the extent to which the alternatives will physically encroach on Section 4(f) property. While there may be an existing right-of-way of 80 feet for most sections of Route 1, only a portion of the right-of-way is paved. In particular, the existing paved areas near the Sharp Stable Complex, Grand View, Woodlawn Baptist Church and cemetery, and the Woodlawn Quaker Meetinghouse and cemetery narrows to an approximate width of 48 feet. This section should more closely evaluate the magnitude of the impacts that would result from widening the existing roadbed from 48 feet in this section to the typical section width of 148 feet, which would more than triple the existing roadbed.

Response: *Physical impacts were calculated as the difference in acreage between the current and proposed VDOT right-of-way within the corridor, regardless of the extent of pavement within the right-of-way. Visual impacts were examined via the preparation of a viewshed analysis (sight-line profiles) based on the proposed conceptual design. This viewshed analysis was presented to the consulting parties and is included as an attachment to the Section 4(f) Evaluation.*

Comment: Because of the constraints of the existing topography, this alternative (Alternative C) would require massive cuts into the hillside of the National Historic Landmark property and would directly impact the Woodlawn Baptist Church and cemetery, requiring more than 100 graves to be dug up and relocated. In addition, this alternative would use and directly harm the Sharpe Stable Complex bank barn, the Woodlawn Quaker Meetinghouse and cemetery, and Grand View. FHWA’s existing viewshed analysis is helpful to understanding the magnitude of each alternative; however, FHWA should provide additional viewshed analysis in the form of conceptual views of each alignment along Route 1 to more fully understand the impacts of each alternative as people enter and exit the Woodlawn historic district.

Response: *The viewshed analysis (sight-line profiles) was prepared for the proposed conceptual designs of Alternatives B and C to allow for the comparison of impacts on a relative scale. Any additional viewshed analysis would take place during the design stage of the process. The provision of design workshops to address the design of gateways into the Woodlawn Historic District (including, but not limited to lighting and the size and location of sidewalks, trails, fences, and signs) and to address landscaping to rehabilitate the setting and maintain viewsheds, among other design details, has been included in the Section 106 Programmatic Agreement. Reference to the design workshops has been included in the Final Section 4(f) Evaluation.*

Comment: Page 21 & Page 24. We would like to see further effort to reduce the amount of encroachment to the absolute minimum necessary to accommodate the project. (This would apply to both alignment alternatives.) In our view, for example, “all possible planning to minimize harm” should include consideration of 11-foot-wide driving lanes through the historic district, and further efforts to reduce the width of the transit corridor. During Section 106 consultation for the Old Mill Road widening project, we often discussed the importance of creating a “gateway” feeling for the Woodlawn Historic District, so that drivers would be reminded that they are entering and passing through a special place that is very different from the surrounding area. Creating a narrower profile for this segment of the project (both the transit portion, and the driving portion, as was done for Old Mill Road) would help to reinforce that goal and minimize harm to the historic district.

In addition, the FHWA has not fully explored the alternative of taking the entire right-of-way, but removing the median from the section of the project through the historic district during the interim period before transit is implemented, and reserving the remainder of the right-of-way as open space to the north or south of the alignment. This alternative would reduce the physical encroachment of the highway until the necessary transit studies are completed. In addition, it would provide an opportunity to study ways to narrow the transit footprint even further, without having already paved over the outer portion of the right-of-way. Once the county is prepared to implement new transit measures, the road could be shifted into the already acquired right-of-way and mass transit alternatives could be constructed in the center of the roadbed.

Response: *The Programmatic Agreement contains stipulations requiring FHWA to examine options to reduce impacts in the Woodlawn Historic District. Potential options that may be considered to minimize the roadway section through Woodlawn Historic District include reducing speed limits, extending the roadway section at the eastern terminus of the project (with little or no median) as far into the historic district as is feasible and prudent, and seeking design waivers and exceptions to minimize the width of the road and the right-of-way through Woodlawn Historic District. Another provision would require FHWA to conduct design workshops to address the design of gateways into the Woodlawn Historic District (including, but not limited to lighting and the size and location of sidewalks, trails, fences, and signs). Reference to the design workshops has been included in the Final Section 4(f) Evaluation.*

Comment: This section of the document should also address the ultimate impact that will occur once the landscaped median is removed in the future. Once the median is paved over, a vast strip of asphalt almost 110 feet wide will run directly through the heart of the historic district.

Response: *The potential impacts of future transit that would be accommodated by this undertaking are addressed in the Indirect/Cumulative Impact section of the Memo-to-File. If any such transit is proposed in the future, a separate NEPA/NHPA process, including any necessary mitigation, would occur at that time.*

Comment: Page 25. This section fails to explain fully how the preferred alternative would reduce the harm that would otherwise be caused by widening the road in place. (For example, shifting the road away from the National Historic Landmark would avoid making large cuts into the hillside of the National Historic Landmark property).

Response: *Additional information on how the Preferred Alternative would reduce the harm that would otherwise be caused by Alternative C has been added by way of two tables (similar to Tables 2 and 3 herein) that summarize the impacts and mitigation proposed for Alternative B in the Section 106 Programmatic Agreement.*

Comments on June 1, 2012 EA:

Comment: Page 36. This section should be expanded to capture the extent to which historic resources are being avoided. The number of graves that would need to be relocated should also be specified in this section (as well as in Table 4 on page 41 of the EA).

Response: *Additional information on the extent to which historic resources are being avoided is included in the Section 4(f) Evaluation, which is included as Appendix C. A detailed grave marker assessment and ground penetrating radar (GPR) survey of the Woodlawn Baptist Church cemetery was completed in May 2012. The total number of graves within the cemetery, as indicated from marker data and GPR, is estimated between 176 and 179. Alternative B would avoid displacement of any graves in the cemetery and Alternative C would require relocation of approximately 100 graves.*

Comment: Page 36. The preferred alternative also moves the road further away from the Sharpe Stables Complex and specifically the historic bank barn, which will aid in the long term preservation of these historic structures.

Response: *Comment noted.*

Comment: Pages 52-53 & 7.1. The EA states that the FHWA has determined that there would be no adverse effect on the Sharpe Stable Complex; however, it also states that there would be adverse effects to the Sharpe Stable Complex bank barn. These two statements are inconsistent. If the bank barn would be impacted by this project it would seem that the other buildings in close proximity to the bank barn would also be impacted.

Response: *FHWA acknowledges, and the final Programmatic Agreement reflects the determination, that the project would have an adverse effect on the Sharpe Stables Complex, including visual and auditory impacts. Mitigation for impacts to the Woodlawn Historic District, within which both the complex and bank barn reside, includes design workshops that would discuss features for landscaping to rehabilitate the setting and maintain viewsheds and the appropriateness and feasibility of sound abatement measures, if such measures are requested by qualifying landowners. As such, all buildings in the complex would benefit.*

Comment: Table 7.1 fails to quantify the use of land from within the Woodlawn Historic District and Woodlawn Plantation, which provides an objective basis for comparing the adverse impacts of the two alternatives. Although this information is included in Table 4 on page 41, it should be included in Table 7.1 as well.

Response: *Table 7.1 qualitatively describes the impacts and mitigation for Alternative B only, as itemized in the Programmatic Agreement, whereas the findings from the quantitative analysis included in Table 4 directly compares the two build alternatives and the No-Build Alternative. Note that the Section 4(f) Evaluation, which is included as Appendix C, also includes a comparison between the two alternatives.*

Comment: One of the largest omissions in the EA and Section 4(f) evaluations is any discussion of the cumulative impacts of this project together with the Richmond Highway-Telegraph Road Connector project (i.e., widening of Old Mill Road and the Mulligan Road connector). In particular, the cumulative impacts under Alternative C would result in almost six acres of property being taken from the NHL to be bulldozed and paved over as a result of these two projects. The FHWA should include a thorough evaluation of the cumulative impacts on historic properties.

Response: See Section 5 of this Memo-to-File.

Fort Belvoir

General:

Comment: Page 17. Figure 3, Alternative B, Sheet 2 of 6 is currently identical to the previous graphic "Sheet 1". Replace with "Sheet 2".

Response: Updated conceptual plans for Alternative B Modified are shown in Figure 1.

Comment: Add a map/figure to show locations of the sites mentioned in 3.12, the hazardous materials sites located within 500 feet of the limits of construction, the info came from both VDOT's and Fort Belvoir's GIS databases. There really isn't anything in 3.12 or elsewhere that depicts these sites. We could even append such a map/figure to the MOA.

Response: Since the completion of the June 1, 2012 EA, Phase I & II Environmental Site Assessment Reports (September and October 2012) have been completed for the project corridor. Each of these reports includes graphics that show the locations of hazardous materials sites within the corridor; see Section 4.4 of this Memo-to-File for additional information.

Mitigation:

Comment: Mitigation requirements and objectives for wetland loss, tree removal, and habitat loss will need to be addressed. Meetings between the installation and FHWA need to be scheduled to discuss this. Insert the following statement into the FONSI "FHWA will hold a series of meetings with Fort Belvoir to discuss and agree on the exact mitigation strategies for tree loss and impact to wetlands, streams, the Wildlife Corridor, and Threatened and Endangered Species."

Response: Comment noted. Recommended statement will be added to the Memo-to-File.

Comment: Page 23. Fort Belvoir disagrees with the statement "The project would provide compensatory wetland and stream mitigation, most likely through the purchase of credits from a mitigation bank". Fort Belvoir's position, which is consistent with Federal law, is that on-site mitigation should be pursued as first priority. Purchasing credits should be the last choice in mitigation strategies.

Response: Comment noted. Reference to on-site mitigation as the first priority will be added to the Memo-to-File.

Comment: Page 23. Stream mitigation needs to be completed on the Installation through stream restoration. All wetlands and stream functions and values need to be replaced on the Installation to meet the no-net-loss requirement (see guidance in the Installation Environmental Program Management Guide, 2002).

Response: Comment noted. Reference to the no-net-loss requirement will be added to the Memo-to-File.

Comment: Page 24. Aspects of the project that are required by law should not be listed as mitigation measures. This includes stormwater management, T&E species surveys, noise attenuation, etc. Enhanced stormwater management features above and beyond requirements, if provided, should be listed as mitigation.

Response: *Comment noted.*

Comment: Page 24. The replacement of lost trees on Fort Belvoir property at a 2:1 ratio or negotiated compensation should be listed under mitigation measures.

Response: *Comment noted. With regard to tree replacement, reference will be made to Fort Belvoir Policy Memorandum #27, Tree Removal and Protection, which states that two new trees shall be planted for each live tree four inches in diameter and larger removed through construction. As stated in the memorandum, requirements for size and species will depend upon site characteristics and location. Fort Belvoir Department of Public Works (DPW) will make this assessment. Tree replacements will generally adhere to a prescribed scheme that includes nursery-grown landscape trees for those removed in improved grounds and high visibility areas, and native tree seedlings with a mixture of landscape trees in unimproved grounds. If it is not possible to plant the required number of replacement trees, project-related alternatives such as environmentally-beneficial restoration, enhancement, or preservation measures may be employed. DPW approval of out-of-kind, compensatory mitigations is required and funding must be equivalent to that required to plant the remaining trees. DPW maintains a list of mitigation options and restoration sites.*

Comment: Page 24. Mitigation for the loss of area in Accotink Refuge and Fort Belvoir's Wildlife Corridor needs to be listed under mitigation measures. The specific measures should be the expanded bridge over Accotink Creek to serve as a wildlife crossing, and enhanced culverts for Mason Run and the unnamed tributary near Britton Drive to also serve as wildlife crossings.

Response: *Comment noted.*

Road Alignment:

Comment: Page 34. An alternative often discussed in the public forum but not recorded in the EA as an alternative considered but dismissed, is an elevated road section through the Historic District to limit the width of road ROW. Suggest language be inserted to discuss why this was not pursued for further analysis.

Response: *Elevating Route 1 through the Historic District was discussed as the Woodlawn Historic District Bifurcated Alternative. This alternative was presented along with the reasons for its dismissal in the Alternatives Considered but Dismissed Section of the EA.*

Comment: Page 36. The Eleanor Kennedy Shelter is not at the Telegraph Road / Route 1 intersection and should be removed from this discussion of the Telegraph Road interchange preferred alternative. It is located at the Pohick Rd. / Route 1 intersection.

Response: *Under Alternative C, Pohick Road would be connected directly to the Fairfax County Parkway with a flyover ramp. Page 36 should have made reference to the Fairfax County Parkway in addition to Telegraph Road. The statement in the EA that Alternative B would have less impact on the Eleanor Kennedy Shelter is accurate.*

Natural Resources:

Comment: Page 41. Provide a graphic within the EA that shows how the acreage impacts to "Prime and Unique Farmland" and "Forest" were calculated and where they are located within the project area. The Section 4(f) report does not address these categories in detail.

Response: Prime and Unique Farmland was identified by using the Web Soil Survey (Natural Resource Conservation Services-<http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>). The relevant soil types for the county were identified by their Map Unit symbols and a prime farmland layer was created for calculations, which contains both soils rated “All Areas Are Prime Farmland” and “Farmland of Statewide Importance”. Calculations on forest cover were completed utilizing the VDOT GIS dataset (note that the file originated from the Virginia Department of Forestry).

Comment: Page 58. Stream mitigation needs to be completed on the Installation through stream restoration. All wetlands and stream functions and values need to be replaced on the Installation to meet the no-net-loss requirement (see guidance in the Installation Environmental Program Management Guide, 2002). Wetlands credits that cannot be created as part of the stream restoration on site will likely need to be purchased, due to other constraints.

Response: Comment noted. Reference to the no-net-loss requirement has been added to the Memo-to-File.

Cumulative Impacts:

Comment: Page 67. Sentence tense should be changed to past tense for "The BRAC action at Fort Belvoir" and "Fort Belvoir On Post Improvements" since these actions are complete.

Response: Comment noted.

Comment: Page 67. Provide expected completion date for Mulligan Road (July 2013).

Response: Comment noted.

Agency Coordination:

Comment: Page 71. USACE Baltimore should be listed under “Agencies Contacted”.

Response: Comment noted. USACE Baltimore is referenced under Section 4.1.3, Agency Partnering.

Virginia Department of Historic Resources

Comments on June 1, 2012 EA:

Comment: At the last consulting parties meeting, a suggestion was made that FHWA should pursue a limited improvements option along Route 1 from Belvoir Road to Mount Vernon Highway/Mulligan Road. The rationale for this approach is to acknowledge the overriding significance of the historic properties along this stretch of Route 1 and to limit, to the greatest extent possible, impacts to them. Certain improvements can occur, but the intention would be to subjugate the transportation needs along this small section of Route 1 to the historical issues. In a letter dated 11 June 2012 responding to this idea, FHWA stated that "an essential component of the FHWA proposal is the median that will be reserved for future transit and will be an invaluable asset for future citizens." We have no doubt that such a transit system will be an asset if it is ever constructed. But the current economic conditions have constrained funding, thereby pushing the "future" farther and farther off. The DHR would like to remind FHWA that the Historic District is also an invaluable asset that exists for future citizens. We do not want FHWA and Fairfax County to cause irrevocable damage to our shared cultural heritage in anticipation of a transit system that may never materialize. If someday funding becomes available for a transit system, it can be dealt with at that time. By examining the possibility for conducting limited

improvements along the most preservation sensitive section of Route 1, FHWA would be fulfilling its responsibility under 36 CFR 800.6 (a).

Response: *This reduced project scope was suggested at various times during the development and evaluation of project alternatives as well as at the last consulting parties meeting. FHWA acknowledges that several other suggestions made at the meeting were evaluated, including consideration of one-way pairs (reversible direction lanes) and the construction of a tunnel beneath the historic district. The EA has been supplemented with a Memo-to-File that includes documentation regarding consideration of these other alternatives. VDHR's proposed Alternative A (modified) most closely matches the Transportation System Management (TSM) Alternative discussed in Section IV (Avoidance Alternatives) of the Draft Section 4(f) Evaluation and Section 2.6 of the EA as an alternative that was considered but dismissed. TSM is described as the "implementation of relatively low-cost actions to improve the efficiency of existing transportation systems". This would include some of the suggestions made by VDHR and other consulting parties, such as additional turning lanes and the use of one-way pairs within the existing roadway alignment. TSM was dismissed from further analysis after it was determined that "such actions are important elements in the overall transportation plan for any urbanized area; however, none alone or in combination would provide the additional capacity needed to serve traffic demand and to safely accommodate the forecasted traffic." As with TSM, the proposed Alternative A (modified) would not meet the project purpose and need for the same reasons.*

In addition to providing increased vehicular capacity, the purpose and need specifies that the project should "implement facilities for pedestrian and bicycle travel, and provide space for future transit services pursuant to Fairfax County's Comprehensive Plan." Ultimately, the addition of pedestrian, bicycle, and transit facilities cannot be accomplished without significantly widening the right-of-way and roadway cross section. VDHR has expressed skepticism about the short-term likelihood of funding a transit system; however, FHWA and its partners are committed to planning for that eventuality. Although funding for the implementation of transit may or may not materialize in the short-term, FHWA is obligated to include a transit median to accommodate Fairfax County's longer-term planning objectives. Deferring allowances for transit would result in a piecemeal approach that could cumulatively increase impacts to the Historic District in the long-term.

VDHR has acknowledged that widening the existing roadway alignment to accommodate increased vehicular, pedestrian, bicycle, and transit components within the Historic District would be unacceptable. Since each of the components is a crucial aspect of continued transportation viability, long-term impacts to the Historic District must be minimized by implementing a project alternative that will prevent the unacceptable effects that widening in place would cause. As one compares the benefits and impacts of each of the two build alternatives, any minimization of the roadway cross section for one of the build alternatives would also be applicable to the other build alternative. Therefore the rationale and justification for selection by FHWA of Alternative B over Alternative C would not change.

Draft Section 4(f) Comments:

Comment: DHR is not prepared to concur with FHWA's Section 4(f) evaluation. We do not believe that FHWA has demonstrated that there are no feasible and prudent alternatives to the use of the land from the Section 4(f) properties; nor do we believe that FHWA has conducted all possible planning to minimize harm to these properties resulting from such use. We request that FHWA carefully consider the practicability for limited improvements along Route 1 from Belvoir Road to Mount Vernon Memorial Highway/Mulligan Road.

Response: *As documented in the EA and Draft Section 4(f) Statement, FHWA has conducted analysis, including the consideration of limited improvements and other avoidance options, to determine whether a prudent and feasible alternative to the use of 4(f) properties exists. In regard to*

implementing all planning to minimize harm to 4(f) (historic) properties, FHWA, VDOT and Fairfax County have agreed to reduce the current county comprehensive plan requirements for Route 1 from a designated 176 feet wide right-of-way and 58 feet wide median to 148 feet wide right-of-way with a 32 feet wide median. It is important to note that Alternative B was developed as a minimization alternative to Alternative C (minimization of impact to historic property). Alternative B ultimately uses significantly less historic district property for public roadways, avoids relocation of a large number of graves, and locates Route 1 farther away from the National Historic Landmark and Quaker Meetinghouse, as compared to Alternative C.

FHWA will continue to identify ways to minimize and mitigate project impacts as the project moves into the design-build phase, as indicated in the Section 106 Programmatic Agreement with the provision of design workshops. Review of more detailed design issues and possible roadway, stormwater management, and traffic control design exceptions/waivers can be most appropriately considered during initial development of design-build plans.

Alexandria Monthly Meeting of the Religious Society of Friends

General:

Comment: It is Friends' view that additional careful consideration of project alternatives, including variations that would avoid, minimize, and mitigate adverse effects to historic properties, is necessary before final decisions are made.

Response: *Comment noted.*

Comment: We note, as a matter of record, that the statement that "...numerous individual coordination meetings were held with representatives . . ." (Draft EA, p. 13) should not list Woodlawn Quaker Meetinghouse as participating in such a meeting. While Friends have had open communication with FHWA staff during the Section 106 process, we were not invited at any time to an "individual coordination" meeting.

Response: *Comment noted; although FHWA coordinated with the Friends throughout the Section 106 process, an individual coordination meeting was not held.*

No Build Alternative:

Comments: Friends does not advocate consideration of a "no-build" alternative. This alternative would be, at best, a short-term reprieve from the "build" alternatives' anticipated adverse effects to the Woodlawn Quaker Meetinghouse and the Woodlawn Historic District. "No-build" would only offer benefits as a preferred alternative if there were commitments: to address issues and adverse effects to historic properties more fully in the future planning for any necessary widening; and to consider alternatives that would minimize the footprint of the road based on results from transit studies and/or incorporate quiet pavement technology.

Response: *NEPA documents require the analysis of a No-Build, or No Action, Alternative. The No Action Alternative identifies the expected environmental impacts in the future if existing conditions were left as is with no action taken by the lead agency. Analysis of the No Action Alternative is used to establish a baseline upon which to compare the proposed "Action" alternatives.*

Southern Bypass Alternative:

Comment: Friends have consistently commented that the "southern bypass" alternative poses adverse effects to the Meetinghouse property, and to the district, effects that we regret FHWA proposes to address only after the execution of a programmatic agreement (and, depending on

the terms of a final version of the programmatic agreement, possibly not until after the road has been constructed). Deferred consideration of adverse effects resulting from the reconfiguration of the landscapes of the historic district limits opportunities to fully consider alternatives for avoiding, minimizing, or mitigating adverse effects to historic properties prior to making a final decision on the undertaking, and deprives stakeholders of information about project outcomes needed to assess the continued viability of current equestrian and agricultural uses.

Response: *Comment noted.*

Comment: More information is necessary to assess the effects of the new construction on the historic landscape and the setting of the Meetinghouse. While there is an obvious benefit to moving the road farther away instead of closer to the Meetinghouse, there has been insufficient consideration of what the as-built conditions would be to all landscapes of the Woodlawn Historic District:

- what the new drive would look like, including what vegetative screening would remain or be installed,
- where stormwater ponds would ultimately be located, and
- how the ownership and operation issues of the new drive would be resolved.

Response: *A preliminary viewshed analysis (sight-line profiles) was prepared for the proposed conceptual designs of Alternatives B and C to allow for the comparison of impacts on a relative scale. Any additional viewshed analysis would take place during the design stage of the process. The provision of design workshops to discuss the appearance, ownership, and operations of the shared-use driveway that will provide access to the Trust, Woodlawn Baptist Church, and Woodlawn Quaker Meetinghouse (a portion of which will be controlled and maintained by VDOT); the location and design of stormwater management ponds or drainage areas to minimize the total disturbance of natural vegetation and soil within the boundaries and viewshed of the Woodlawn Historic District and minimize adverse effects; and to address landscaping to rehabilitate the setting and maintain viewsheds, among other design details, has been included in the Section 106 Programmatic Agreement.*

Widen in Place Alternative:

Comment: Friends have voiced concern about the “widen-in-place” alternative as adversely affecting the Woodlawn Quaker Meetinghouse and potentially involving taking land from our property. However, because the Draft Programmatic Agreement does not acknowledge this alternative as a possibility, Friends and other consulting parties have had insufficient opportunity to have meaningful discussion with FHWA about how adverse effects to the Meetinghouse and other historic properties would be avoided, minimized or mitigated.

Response: *Comment noted. The Programmatic Agreement has been developed for the Preferred Alternative, Alternative B Modified. As such, avoidance, minimization, and mitigation is only included for impacts of the Southern Bypass Alignment on the Woodlawn Historic District.*

Comment: Because the Draft Section 4(f) Evaluation does not acknowledge any taking of land from the Meetinghouse property, no consideration has been given to seeking feasible and prudent alternatives to such taking.

Response: *Although the construction limits of Alternative C as shown in the conceptual graphic show an impact to the Woodlawn Quaker Meetinghouse; neither Alternative B nor Alternative C require the permanent acquisition of land from Meetinghouse property.*

Comment: Friends have no clear information as to whether our property would be taken in the event this alternative is selected. Can taking of land from Friends’ property be avoided in the

widen-in-place alternative? Would retaining walls at our reduced property boundary be necessary? Would sound barriers be called for? Would quiet pavement technology be used? How will our access be affected?

Response: *A Programmatic Agreement has been developed for the Preferred Alternative, Alternative B Modified. As such, mitigation has been included for the impacts of the Southern Bypass Alignment on the Woodlawn Historic District, which includes provisions for design workshops wherein discussions can be held regarding landscaping, access to properties within the District, and the appropriateness and feasibility of sound abatement measures, if such measures are requested by qualifying landowners.*

Comment: Design drawings for the Draft EA, the Draft Section 4(f) Evaluation, and the Public Meeting present contradictory information about the Right-of-Way and construction limits placed across our property by Alternative C.

Response: *Plans shown in these various documents may not be identical as updates were being made continuously throughout the course of the study as additional information became available or comments were received from consulting parties, the public, or through the agency coordination process. Updated conceptual plans for the Preferred Alternative, Alternative B Modified, are shown in Figure 1.*

Comment: Table 5 in the Draft EA appendix summarizes effects to access, showing “no effect” to our access under all three alternatives. What is the basis for this determination?

Response: *The no change in access was indicated in the EA as access to the Meetinghouse would continue to be provided from Route 1 via Woodlawn Road. Note that the Programmatic Agreement includes a provision for design workshops to discuss the appearance, ownership, and operations of the shared-use driveway that will provide access to the Trust, Woodlawn Baptist Church, and Woodlawn Quaker Meetinghouse (a portion of which will be controlled and maintained by VDOT).*

Comment: The long-term viability of the Meetinghouse as a place for Quaker worship and the Friends’ traditional practice of silent worship would be threatened by the introduction of noise levels significantly beyond existing levels.

Response: *The Southern Bypass Alignment shifts Route 1 further away from the Meetinghouse. In addition, a Programmatic Agreement has been developed for the Preferred Alternative, Alternative B Modified, which includes provisions for design workshops wherein discussions can be held regarding the appropriateness and feasibility of sound abatement measures, if such measures are requested by qualifying landowners.*

Comment: The significant direct adverse effects to the Baptist cemetery that would result from the “widen-in-place” alternative are acknowledged in the draft EA, but are not addressed in the programmatic agreement.

Response: *Comment noted. The Programmatic Agreement has been developed for the Preferred Alternative, Alternative B Modified. As such, avoidance, minimization, and mitigation is only included for impacts of the Southern Bypass Alignment on the Woodlawn Historic District.*

Comment: The “widen in place” alternative, as proposed, would adversely affect the setting and viewshed of the Woodlawn mansion in significant ways, and would isolate the mansion from its historic setting, and would significantly adversely affect Pohick Church, by introducing a flyover within its viewshed.

Response: *Comment noted. Preferred Alternative B Modified does not include a flyover at the Telegraph Road intersection; therefore, it would not adversely affect Pohick Church. A Programmatic Agreement has been developed for the Preferred Alternative and avoidance, minimization, and mitigation is included for impacts of the Southern Bypass Alignment on the Woodlawn Historic District, including the provision of design workshops to discuss landscaping to rehabilitate the setting and maintain viewsheds; circulation patterns within the District for vehicular, pedestrian, and equestrian access, including portions of the Potomac Heritage National Scenic Trail and the Washington-Rochambeau Revolutionary Route National Historic Trail and the abandoned section of Route 1; and the design of gateways into the Woodlawn Historic District, including, but not limited to lighting and the size and location of sidewalks, trails, fences, and signs.*

Save Woodlawn Stables

Needs and Purpose:

Comment: The chart on page 6 shows that currently the traffic volumes in the area of the Woodlawn Historic District, Belvoir Road to Mt. Vernon Memorial Highway, are currently Rated B and C. It is only under a No Build scenario in 2040 that this section of roadway reaches a Level of Service E and F. The study notes that the Mulligan Road connector seems to relieve much of the anticipated traffic volume. Is the Need based on the 2040 projections, because the current baseline shows that for the area of the Woodlawn Historic District, there is no “Need” for a Build scenario for this section of the road?

Response: *Level of service at isolated intersections is not an effective indication of operations within a corridor as it does not reflect congestion and queuing that may be present in the corridor upstream or downstream of the location. The Transportation Technical Report includes the analysis and findings for existing and future traffic operations along the entire study corridor, which support the purpose and need for the project. Nevertheless, the fact that the number of locations in Table 1 on page 6 that would operate at LOS E or F increases from Existing Conditions to No-Build Conditions does indicate that there is a need for improvements, i.e., more segments of Route 1 will experience failing operations due to the increase in travel demand within the corridor by 2040. Mulligan Road will not relieve the anticipated traffic volume given the current and projected land uses within the project limits (for example, the new Fort Belvoir Community Hospital); while that new facility and Telegraph Road may serve as an alternate route for some through vehicles, demand is still forecast to increase in the study corridor.*

Comment: The Fairfax County 2011 Comprehensive Plan for the Mount Vernon District calls for a planted median of 16’-20’ for the six-eight lane sections of Route 1 (Mount Vernon Comp. Plan, page 91). The proposed 32’ median is excessive and not called for in the Comprehensive Plan. The Comp Plan Vision for Route 1 does call for Metrorail/Monorail/LRT/BRT. Were Metro to run down Route 1, it would need to be tunneled or the tracks raised significantly (and with great expense) in both locations. If a tunnel for rail transit were to be placed underground, then the 32’ median becomes unnecessary. For LRT/BRT you only need the section of 16’-20’ as called for in the Comprehensive Plan. In short, why plan for a median in the roadbed that is technically unbuildable? Why not plan for the tunneling scenario, or at least show a road section consistent with that shown in the Comprehensive Plan? A smaller median of 16’-20’ can then be constructed to meet the stated Purpose and Need of the project and minimize adverse impacts to the Historic District.

Response: As stated in footnote 15 on page 14 of the EA, the median width of 32 feet reflects a reduction from the Fairfax County Comprehensive Plan Alternative, which measures 176 feet and includes a median width of 58 feet. The reduced median width of 32 feet proposed as part of this project was the product of negotiations between VDOT and the U.S. Army in conjunction with the necessity to set aside right-of-way for the Route 1 widening when the new Gunston Road bridge was designed and constructed. Since the Memorandum of Agreement between VDOT and the Army allows for widening to more than 148 feet at intersections, it was agreed that 32 feet would be adequate to accommodate two transit travel ways (26 feet) plus a 3-foot buffer/separation on each side of the travel way and platforms would be accommodated at intersections and where the roadway can be wider than 148 feet.

A tunnel option was examined through the Woodlawn Historic District; however, its impacts outweighed any benefits from undergrounding the roadway.

The provision of design workshops to examine options to reduce impacts in the Historic District has been included in the Section 106 Programmatic Agreement. Potential options that may be considered to minimize the roadway section through Woodlawn Historic District include reducing speed limits, extending the roadway section at the eastern terminus of the project (with little or no median) as far into the historic district as is feasible and prudent, and seeking design waivers and exceptions to minimize the width of the road and the right-of-way through Woodlawn Historic District.

Comment: In addition, it seems there is more design flexibility in the Purpose to also meet the recommendations of the DHR letter dated May 21, 2012 to look at a limited build option.

Response: The reduced project scope would result in fewer impacts to the adjacent historic properties; however, this suggestion would not satisfy the purpose and need of the project. An essential component of the FHWA proposal is the median that will be reserved for future transit and will be an invaluable asset for future citizens. Adequate facilities for pedestrians and bicyclists are also a crucial element of the proposal. FHWA and its partners cannot support a reduced scope of work that precludes these features.

FHWA is committed to minimizing impacts to historic properties and other culturally valuable resources throughout the project area. For that reason, FHWA identified the "Southern Bypass" as the preferred alternative. The bypass would avoid impacts to the Woodlawn National Historic Landmark to the greatest extent possible and avoid adverse impacts to several other historic sites, including the Woodlawn Baptist Church Cemetery. Although it is unfortunate that the bypass will require the relocation of the Otis Mason House, FHWA is committed to mitigating for the impact in coordination with VDHR and the other consulting parties. FHWA has also worked with an equestrian consultant and prepared preliminary plans for the possible reconfiguration of the Sharpe Stables Complex/Woodlawn Stables.

Comment: The VDOT/Army MOA road section used as the basis for the project shows a number of items not consistent with the build options presented:

- The MOA does not extend to the intersection with Route 235. Therefore, there is no mandate to continue with the road width proscribed by the MOA through the entire Woodlawn Historic District. (Sheet A4, Appendix A of the MOA)
- The MOA depicts a separated mass transit median, but only in front of NTHP property, but text does not explain why this is the case. (Sheet A4, Appendix A of the MOA)
- The median shown has 26' for BRT, with 8' of shoulder between the tracks. But there is no discussion of why this condition is necessary or desirable through the Historic District.

Adequate planning could provide a smaller median width. (Exhibit B, Appendix A of the MOA)

- The entire MOA is subject to the NEPA/NHPA approval and review process. If the ROW width and median are driving adverse impacts to historic properties in the NR and NHL, which the Draft EA has noted, then the conditions of the original road section should be reexamined in this context. 148' is a maximum ROW; the minimum of 122' for a primary arterial is set by the Comprehensive Plan and could be the point to start a new negotiation to minimize adverse impacts of the project. (Pages 3 and 4, Recitals of Appendix A of the MOA)

Response: *Alternatives B and C were developed in cooperation with VDOT and the U.S. Army. Subsequent to the release of the EA, additional efforts to minimize the roadway section through the Woodlawn Historic District have occurred and are documented in the Section 106 Programmatic Agreement.*

Other Projects and Plans in the Area:

Comment: The only 176' foot section shown is Figure 3 on page 32 of the Transportation Policies section, but this road section is supposed to be a flexible guide, it is policy, not a statute. The Comprehensive Plan for the Mount Vernon District which shows a much smaller road section with a 16'-20' median for LRT/BRT. The Draft EA Report talks about the 176' road section as if it is a mandated for the Enhanced Transportation Corridor of Route 1. However:

- This section of Route 1 in Woodlawn is not an Enhanced Transportation Corridor, only those portions at Beacon Hill and North to I-95 are designated;
- There is no text in either the Mount Vernon Area Plan or the Transportation Policy Plan where it mandates a 176' section. Again, it says to refer back to your Area Plan.
- Even in that 176' section, the Transportation Plan does not call for a dedicated median of 32'. It is 26' with a 16' platform or turn lane on either side, equaling the 58' originally mentioned. But you do not need platforms or turn lanes in the Woodlawn District because there is no need for a transit stop or a turn through that section of road. One of the stated Purposes of the entire project from the EA report is that it meets the County's Comprehensive Plan. There is no section, no drawing, and no text that says the median must be 32'. The proposed road could reasonably be found to meet the Purpose and Need of the project by using the 16'-20' median called for in the Mount Vernon Area Plan to accommodate LRT/BRT.

Response: *As stated in footnote 15 on page 14 of the EA, the median width of 32 feet reflects a reduction from the Fairfax County Comprehensive Plan Alternative, which measures 176 feet and includes a median width of 58 feet. The reduced median width of 32 feet proposed as part of this project was the product of negotiations between VDOT and the U.S. Army in conjunction with the necessity to set aside right-of-way for the Route 1 widening when the new Gunston Road bridge was designed and constructed. Since the Memorandum of Agreement between VDOT and the Army allows for widening to more than 148 feet at intersections, it was agreed that 32 feet would be adequate to accommodate two transit travel ways (26 feet) plus a 3-foot buffer/separation on each side of the travel way and platforms would be accommodated at intersections and where the roadway can be wider than 148 feet.*

Comment: An alternate design, not considered, could even have the bifurcated option with the transit tunneled below the upper, or southbound, section of Route 1. Section 4F requires study of all possible options.

Response: *Improvements to this section of Route 1 have been studied since the late 1990s, and alternative designs were examined in each of the studies. The Route 1 Corridor Study was*

completed in 1997. Subsequently, the U.S. Route 1 Location Study was completed in 2003, which incorporated the objectives of a centerline design study with environmental analyses and documentation of potential impacts. The 2003 study included a bifurcated option within the Woodlawn Historic District, from Woodlawn Road to Mount Vernon Memorial Highway/Old Mill Road. Finally, an Environmental Assessment (EA) associated with the section of Route 1 from Belvoir Woods Parkway to the Capital Beltway was approved for public availability on March 28, 2003, and a public hearing was held on April 29, 2003. The 2003 EA recommended widening the existing four- and six-lane undivided highway to a six- and eight-lane divided highway, with a sidewalk on one side and a trail on the other. A National Environmental Policy Act (NEPA) decision document was not signed for this section and no recommendations were advanced or approved. The current EA builds off of these previous studies and included an alternatives development process that studied all reasonable potential options.

Comment: The MOA describes a road section for BRT with only 26' for BRT tracks. Why can't this reduced width not be accommodated in this historically sensitive area?

Response: As stated in footnote 15 on page 14 of the EA, the median width of 32 feet reflects a reduction from the Fairfax County Comprehensive Plan Alternative, which measures 176 feet and includes a median width of 58 feet. The reduced median width of 32 feet proposed as part of this project was the product of negotiations between VDOT and the U.S. Army in conjunction with the necessity to set aside right-of-way for the Route 1 widening when the new Gunston Road bridge was designed and constructed. Since the Memorandum of Agreement between VDOT and the Army allows for widening to more than 148 feet at intersections, it was agreed that 32 feet would be adequate to accommodate two transit travel ways (26 feet) plus a 3-foot buffer/separation on each side of the travel way and platforms would be accommodated at intersections and where the roadway can be wider than 148 feet.

The provision of design workshops to examine options to reduce impacts in the Historic District has been included in the Section 106 Programmatic Agreement. Potential options that may be considered to minimize the roadway section through Woodlawn Historic District include reducing speed limits, extending the roadway section at the eastern terminus of the project (with little or no median) as far into the historic district as is feasible and prudent, and seeking design waivers and exceptions to minimize the width of the road and the right-of-way through Woodlawn Historic District.

Alternatives Considered but Dismissed:

Comment: The Fairfax County Plan does not designate a 32' median. It designates 26' with 16' on both sides for platforms/turn lanes in the Transportation Plan and 16'-20' in the Mount Vernon Area Plan. The bifurcated section should be reexamined using the 16'-20' median the Plan does call for.

Response: As stated in footnote 15 on page 14 of the EA, the median width of 32 feet reflects a reduction from the Fairfax County Comprehensive Plan Alternative, which measures 176 feet and includes a median width of 58 feet. The reduced median width of 32 feet proposed as part of this project was the product of negotiations between VDOT and the U.S. Army in conjunction with the necessity to set aside right-of-way for the Route 1 widening when the new Gunston Road bridge was designed and constructed. Since the Memorandum of Agreement between VDOT and the Army allows for widening to more than 148 feet at intersections, it was agreed that 32 feet would be adequate to accommodate two transit travel ways (26 feet) plus a 3-foot buffer/separation on each side of the travel way and platforms would be accommodated at intersections and where the roadway can be wider than 148 feet.

Comment: If Mulligan Road will be open by the time construction begins, could that not be used for the detour? Was this option studied?

Response: *Mulligan Road is currently scheduled to open in July 2013. Mulligan Road will not relieve the existing and anticipated traffic volume and congestion given the current and projected land uses within the project limits (for example, the new Fort Belvoir Community Hospital). While that new facility and Telegraph Road may serve as an alternate route for some through vehicles, demand is still forecast to increase within the study corridor. In addition to providing increased vehicular capacity, the purpose and need specifies that the project should "implement facilities for pedestrian and bicycle travel, and provide space for future transit services pursuant to Fairfax County's Comprehensive Plan." As such, Mulligan Road would not be a reasonable alternative to serve the project's purpose and need.*

Administrative Record:

Comment: Where is the administrative record for these individual coordination meetings? The record for the weekly partnering meetings?

Response: *Meeting minutes for consulting parties meetings are posted on the project website: http://www.efl.fhwa.dot.gov/projects/Rt1_ftbelvoir.aspx. Minutes to weekly partnering meetings are posted on the study team's project worksite and are available upon request. Minutes were taken during some individual coordination meetings; however, some gatherings were informal and minutes may not be available.*

Comment: It should be noted, again, that meetings with the Woodlawn Stables lessee did not commence until late April/early May of 2012, almost a full year after CP meetings with other stakeholders began, and only 1 month prior to the release of this EA document.

Response: *Comment noted. Consulting parties were invited to participate in the meetings throughout the course of the project. Initially, 15 agencies or organizations were invited as consulting parties. As the project progressed, alternatives were developed, and potential impacts to properties further refined or identified, additional organization were invited to participate. For example, Pohick Church, although not originally invited to attend, was notified and asked to participate following the development of the flyover concept at the Telegraph Road interchange. Likewise, the Superintendent of the George Washington Memorial Parkway was invited starting with the third meeting due to concerns about impacts to that facility.*

Comment: Neither Option B or Option C plan for means to access the stables property. Stating that this can be worked out in Consulting Parties design meetings is not feasible as there will need to be some means for cars and trucks to regularly access the property if it is to continue to be used. This would mean a signal, or intersection, or some road connecting to Route 1. Not planning for any access at all shows that either 1) there is no real plan to keep a viable use or business on this side of the property; or 2) access has not been taken into account, but is desirable, meaning it was unintentionally overlooked, but should require some level of planning that would likely affect the design of this entire section of the roadway. How is access to the stables going to be addressed and then evaluated as part of the EA Report?

Response: *Since the completion of the June 1, 2012 EA, conceptual designs for the reconfiguration of the property in order to continue equestrian operations, including new access to the site from Mount Vernon Memorial Highway, have been developed by an equestrian consultant in cooperation with the National Trust for Historic Preservation (NTHP), the owners of the property, and Save Woodlawn Stables, a consulting party with an interest in the property. The new access from Mount Vernon Memorial Highway is included in Alternative B Modified and physical impacts associated with this change in access are accounted for in the revised*

impacts presented in Section 1. Any decisions on the ultimate configuration of the property and any use or redevelopment on the property outside roadway right-of-way would be made further along in the design process.

Mitigation:

Comment: Discussion was not underway with the leaseholder in terms of a design in early June. Designing a multi-purpose underpass for wildlife and pedestrians and equestrians is a difficult needle to thread. Road designs for livestock typically do not recommend a section wider than 90'-100'. The livestock need to see daylight at the other end or they tend not to want to enter. Skylights could help, but perhaps not with such a large road section. The particulars of moving horses and children have not been discussed at all and may not be feasible.

Response: *The Southern Bypass Alignment has been shifted to minimize impacts to the property on which Woodlawn Stables currently operates. As a result of the reconfiguration of the curve, the underpass component, though still proposed, is no longer essential to maintain operations at Woodlawn Stables. Since the completion of the June 1, 2012 EA, conceptual designs for the possible reconfiguration of the property in order to continue equestrian operations, including new access to the site from Mount Vernon Memorial Highway, have been developed by an equestrian consultant in cooperation with the National Trust for Historic Preservation (NTHP), the owners of the property, and Save Woodlawn Stables, a consulting party with an interest in Woodlawn Stables. Any decisions on the ultimate configuration of the property and any use or redevelopment on the property outside roadway right-of-way would be made further along in the design process.*

Comment: Under possible mitigation for Option C, add Sharpe Stables Complex.

Response: *Comment noted. The Programmatic Agreement has been developed for the Preferred Alternative, Alternative B Modified. As such, avoidance, minimization, and mitigation is only included for impacts of the Southern Bypass Alignment on the Woodlawn Historic District.*

Comment: EA Draft Page 31 shows the Construction Limits taking a wide turn through Grand View. Why is this necessary and could this not be mitigated? No discussion in the text.

Response: *The orange line through Grand View House shown in the Alternative C plans represents the construction limits, which were estimated based on the grades at that location. The Preferred Alternative B Modified does not impact Grand View House.*

Historic Preservation/Section 4(f)/NHPA/NEPA:

Comment: § 774.3 (2) The alternative selected must include all possible planning, as defined in §774.17, to minimize harm to Section 4(f) property. The Official with Jurisdiction in this case is the SHPO. While the EA Draft notes that FHWA is seeking concurrence from the SHPO as to the de minimis impacts of the project and for the no adverse impact determinations, the SHPO letter dated May 21 already noted that “relatively minor actions would have much less impact on the NHL property and the historic district as a whole than the preferred bypass option”. Inferring that the Official with Jurisdiction does not agree with the de minimis determination or with the “all possible planning” determination”, the Preferred Alternative cannot be shown to meet the burden of the 4F Requirements.

Response: *As documented in the EA and Draft Section 4(f) Statement, FHWA has conducted analysis, including the consideration of limited improvements and other avoidance options, to determine whether a prudent and feasible alternative to the use of 4(f) properties exists. In regard to implementing all planning to minimize harm to 4(f) (historic) properties, FHWA, VDOT and Fairfax*

County have agreed to reduce the current county comprehensive plan requirements for Route 1 from a designated 176 feet wide right-of-way and 58 feet wide median to 148 feet wide right-of-way with a 32 feet wide median. It is important to note that Alternative B was developed as a minimization alternative to Alternative C (minimization of impact to historic property). Alternative B ultimately uses significantly less historic district property for public roadways, avoids relocation of a large number of graves, and locates Route 1 farther away from the National Historic Landmark and Quaker Meetinghouse, as compared to Alternative C.

FHWA will continue to identify ways to minimize and mitigate project impacts as the project moves into the design-build phase, as indicated in the Section 106 Programmatic Agreement with the provision of design workshops. Review of more detailed design issues and possible roadway, stormwater management, and traffic control design exceptions/waivers can be most appropriately considered during initial development of design-build plans.

Comment: Table 7.1 (EA Draft pages 53-56) do not meet the requirements of (CEQ) 1500.1 (b) NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail. Example: For the Otis Mason House, which will be deconstructed and moved to an undetermined location, its setting demolished, the topography irrevocably altered, the report notes the impact of Alternative B (Bypass) as “The realigned portion of Route 1 would go through the property.” This is not a description of an impact, it is a statement of fact for the road. For the Bank Barn, the impact is “Changes in land use would impact the historic setting of the barn.” For the remainder of the farm outbuildings, Sharpe Stable Complex Dairy, Corncrib and Stable, the impact is “No adverse impacts.” All of these buildings coexist in a complex in a small land area. These statements taken together are not an analysis, and do not approach answering the question of determining the adverse impact. This is instead the “needless detail” the statute specifically warns against.

Response: *Comment noted. A Programmatic Agreement has been developed for the Preferred Alternative, Alternative B Modified, within which mitigation is documented for impacts of the Southern Bypass Alignment on the Woodlawn Historic District.*

Comment: Since the Advisory Council has agreed to reengage in the process, an additional 30-day comment period for the Draft should occur, since their concurrence on the de minimis determinations would be appropriate under 36CFR 800.

Response: *Comment noted.*

Comment: Appendix C, Page 15 II.D Woodlawn Historic District. Barest factual description of the resources, includes only dates constructed, acreages, ownerships. Unusual characteristics of the district should note the particulars of the viewshed, the *raison d’etre* for the establishment of the plantation, the environmental and topographical features of the district, and discuss the relationship of the buildings and structures, and well as their relationship to the Historic Route 1.

Response: *The Woodlawn Historic District was adequately described in order to identify it as a Section 4(f) resource.*

Comment: Why conduct the viewshed studies and then not analyze them as part of the 4(f) analysis? The evaluation of the impact to the Historic District relies solely on two measures: acreage taken and proximity. The evaluation should, at a minimum, include a discussion and analysis of the findings of the viewshed study and discuss how both Build Options would impact the character, integrity and setting the entire NR-eligible district, and the NHL. To use the

standard of acreage taken and proximity is a reductive metric. It was not the sole standard used to evaluate the Mulligan Road project, and is a poor means to determine least overall harm. It does not help to illuminate the fact that the preferred option will result in the removal of some of the distinctive topography and tree canopy of the district (defining features) nor does it discuss the impacts to the integrity of the Historic District that would result from the destruction of a portion of land that has been maintained as open, agricultural fields and meadows for over 200 years and serve as the viewshed to the NHL.

Response: *Section 4(f) requires FHWA to find that there is no prudent and feasible alternative before approving a project that “uses” a Section 4(f) resource. A “use” is when land is permanently incorporated into a transportation facility or when the project’s proximity impacts are so severe that the resource is substantially impaired. Viewshed studies are not analyzed as part of Section 4(f).*

Comment: Page 26, VI. Least Overall Harm Analysis. Iv. Views of the official(s) with jurisdiction over Section 4(f) property. Should note the May 21, 2012, letter from VDHR asking for consideration of a limited-build alternative, and expressing concern for the damage that will result from the preferred alternative.

Response: *Comment noted.*

Summary Comment:

Comment: Alternative C, the option to widen Route 1 in place, would have fewer impacts on the District taken as a whole. Though this would have negative impacts on the Woodlawn Baptist Church Cemetery, there is enough information to justify undertaking a new look at the feasibility of constructing a road of this size, with a median of this width and design through the Historic District. Alternative C may be less damaging if there is more context-sensitive planning and design work undertaken to mitigate the impacts of this build option through the District. Alternately, the Woodlawn Historic District could be removed from this project, and examined during the widening of Route 1 north of Route 235. Levels of Service already indicate levels B and C in this area, so a No-Build Option for this discrete portion of the project area would not adversely impact the Purpose and Need of the undertaking.

Response: *The impacts of Alternative B and C were analyzed in accordance with the National Historic Preservation Act, and in consultation with the SHPO, NTHP, ACHP, and other preservation specialists. The analysis concluded that Alternative B would have less adverse impacts to the Woodlawn Historic District, in comparison with Alternative C.*

7.2 Public Comments

Study Process:

Comment: How does the National Environmental Policy Act (NEPA), Section 106, and Section 4(f) relate to one another?

Response: *All three of these regulations were enacted to protect our natural, human, and historic resources. The National Environmental Policy Act (NEPA) of 1969 requires federal agencies to integrate environmental values into their decision-making processes by considering the environmental impacts of their proposed actions and reasonable alternatives to those actions. The Department of Transportation (DOT) Act of 1966 included a special provision, Section 4(f), which stipulated that the Federal Highway Administration (FHWA) and other DOT agencies cannot approve the use of land from publicly owned parks, recreational areas, wildlife and waterfowl refuges, or public and private historical sites unless specific conditions are met. Finally, Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires Federal agencies to take into account the effects of their undertakings on historic properties.*

Comment: Process undertaken with too much speed and/or information not transparent or compliant. Public not fully informed of the alternatives and pros/cons of each. There was a lack of communication with the public and all parties. Why are no signs posted around the area notifying the public of plans and impacts?

Response: *The current Route 1 Improvements Project, which covers the section of Route 1 between Telegraph Road and Mount Vernon Memorial Highway, was initiated in September 2010.⁴ As noted in the June 1, 2012 EA, Section 4, FHWA, in cooperation with Fairfax County, U.S. Army Garrison Fort Belvoir, and VDOT, has coordinated extensively with local, state, and federal agencies on the Route 1 improvements. FHWA has also conducted an inclusive public involvement program and hosted three public meetings during the course of the study, in December 2010, October 2011, and June 2012. The October 2011 meeting focused on alternatives and input was solicited on conceptual designs for Route 1 as well as the intersections of Route 1 with Telegraph Road and the Fairfax County Parkway that were presented to the public at that time.*

Local, state, and federal agencies and the general public were contacted early in the study and asked to identify issues of concern and to provide information about environmental resources within the study area. The agency and public comments received in response to these coordination efforts were instrumental in defining the scope of the EA. In addition, throughout the process, the public was notified about study findings via the project website (<http://www.epl.fhwa.dot.gov/projects/environment.aspx>) and press releases issued by FHWA, Fairfax County, and Fort Belvoir. The public was given opportunities to provide comments about transportation needs, potential alternatives, and environmental concerns.

⁴ Improvements to this section of Route 1 have been studied since the late 1990s, following the request by the Virginia General Assembly in 1994 that the Virginia Department of Transportation (VDOT) conduct a complete and comprehensive study of the 27-mile U.S. Route 1 corridor in Fairfax and Prince William Counties. The *Route 1 Corridor Study* was completed in 1997. Subsequently, the *U.S. Route 1 Location Study* was completed in 2003, which incorporated the objectives of a centerline design study with environmental analyses and documentation of potential impacts. Finally, an *Environmental Assessment (EA)* associated with the section of Route 1 from Belvoir Woods Parkway to the Capital Beltway was approved for public availability on March 28, 2003, and a public hearing was held on April 29, 2003. The 2003 EA recommended widening the existing four- and six-lane undivided highway to a six- and eight-lane divided highway, with a sidewalk on one side and a trail on the other. A National Environmental Policy Act (NEPA) decision document was not signed for this section and no recommendations were advanced or approved.

Comment: Why is Woodlawn Plantation considered historically more significant than the Stables? Why wasn't Woodlawn Stables invited to participate sooner?

Response: *Since 1951, the National Trust for Historic Preservation (NTHP) has administered the 126-acre Woodlawn Plantation property, which includes two parcels, one on each side of Route 1. The entire National Register for Historic Places (NRHP)-listed Woodlawn Plantation property on both sides of Route 1 contributes to the Woodlawn Historic District. However, the parcel on the north side of Route 1 also is designated a National Historic Landmark (NHL) (the parcel on the south side of Route 1, which contains the pasture and stables, is not part of the NHL designation). As such, the northern section is afforded greater protection and is subject to special statutory requirements in Section 110(f) of the National Historic Preservation Act. Under these requirements, federal agencies must, "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking."*

The NTHP, as the administrator and owner of the property, participated in the project as a Section 106 consulting party. Woodlawn Stables, a consulting party with an interest in the stables, was notified about the project by the NTHP. Save Woodlawn Stables, the organization that represents the stables, was formally added in May 2012 upon their request.

Comment: The EA states there have been six National Historic Preservation Act (NHPA) Consultation meetings starting June 16, 2011. When were all the Consulting Parties invited to these meetings, especially the consulting parties adversely affected by the proposed action?

Response: *Consulting parties were invited to participate in the meetings throughout the course of the project. Initially, 15 agencies or organizations were invited as consulting parties. As the project progressed, alternatives were developed, and potential impacts to properties further refined or identified, additional organization were invited to participate. For example, Pohick Church, although not originally invited to attend, was notified and asked to participate following the development of the flyover concept at the Telegraph Road interchange. Likewise, the Superintendent of the George Washington Memorial Parkway was invited starting with the third meeting due to concerns about impacts to that facility.*

Comment: The public meeting revealed that a significant part of the community had been disenfranchised by the review process - it would appear that this in violation of Section 106 and as a result, the current options under consideration are limited.

Response: *Public involvement was ongoing throughout the NEPA and project development process. ACHP was engaged in the Section 106 process based on the stated concerns and determined that the process was occurring in accordance with the intent of the National Historic Preservation Act.*

Comment: An Environmental Assessment is adequate for the widen-in-place alternative; however, an Environmental Impact Statement should be prepared for the Southern Bypass Alignment.

Response: *The purpose of an Environmental Assessment is to determine if a proposed action would have significant environmental impacts warranting preparation of an Environmental Impact Statement. No significant environmental impacts are identified that would warrant preparation of an Environmental Impact Statement for the Route 1 Improvements Project.*

Comment: Were transportation studies also conducted for the project, and by who?

Response: *Transportation studies were conducted by FHWA's consultant for the project, in collaboration with both the Fairfax County and Virginia Departments of Transportation. The methodology and results of the transportation analysis are documented in the Transportation Technical Report, which was completed in April 2012.*

Comment: The BRAC EIS did not indicate that widening was necessary. Why are improvements being proposed now?

Response: *The BRAC 2005 EIS identified a series of transportation improvements to mitigate the effects of the proposed relocation alternatives on the transportation system. The widening of Route 1 through Fort Belvoir and interchanges at Route 1/Telegraph Road and Route 1/Fairfax County Parkway were identified as mitigation strategies for the two land use alternatives (Town Center and Satellite Campuses) that placed all BRAC-related development within the Main Post area. The improvements were not identified, however, for the Preferred Alternative identified in the EIS as BRAC impacts to Route 1 for that alternative did not reach the threshold needed for Defense Access Road Program certification (the funding mechanism for improvements), which would permit Military Construction (MILCON) funding. In short, while the BRAC 2005 EIS did declare a need for improvements to Route 1, existing and forecast background traffic suggested the need for improvements regardless of the BRAC action at Fort Belvoir. Moreover, the previous location study and the Environmental Assessment approved in March 2003 documented the need for improvements prior to BRAC.*

Comment: How is the Highway Department going to address all the concerns outlined in the various letters so the public knows if the comment was or was not incorporated?

Response: *All of comments received during the public comment period have been reviewed and compiled and will be considered in reaching a decision on the study. A copy of the full public comment record is available upon request. Given the voluminous number of comments submitted during the comment period for both the June 1, 2012 EA and public information meeting held on June 5, 2012, substantive comments were categorized and grouped by subject matter to facilitate the preparation of responses, as documented herein.*

Comment: Per Council on Environmental Quality regulations 40CFR1500-1508, request the final EA and draft Finding of No Significant Impact (FNSI) be put out for public review and comment for a minimum of 15 days but preferably 30 days. There is no FNSI. "The agency shall make the finding of no significant impact available to the affected public as specified in Sec. 1506.6." The dFNSI needs to be out for public review.

Response: *The Final EA for the project was posted on FHWA's website and made available to the public on June 1, 2012. The comment period extended through July 6, 2012. A Finding of No Significant Impact (FONSI) had not been prepared at the time of the public information meeting. Once generated, the FONSI will be made available to the public as required by NEPA regulations, which state that no formal public circulation of the FONSI is required, but the state clearinghouse must be notified of the availability of the FONSI. In addition, FHWA recommends that the public be notified through notices in local newspapers.*

Comment: The public record for this project is incomplete, both on the website and in this EA. The EA notes that it was the Baptist Church that presented three options for shifting the alignment near their church and cemetery. What were these three options for the bypass and when were they presented? In the summary of the May 14, 2012 Consulting Parties meeting, there is no discussion of the strong reservation expressed by many of the consulting parties about the proposed preferred option. Finally, page 52 states that FHWA is in contact with the SHPO to obtain concurrence with these determinations. Why have the SHPO's most recent comments not

been made part of the public record, specifically the letter dated May 21st, urging FHWA to reconsider the Bypass, stating that limited improvements to the current roadway would have "much less impact on the NHL property and the historic district as a whole than the preferred bypass option." When will FHWA be responding to these comments, as well as the other comments made by consulting parties at that May 14th meeting? We would like the complete public record to be made accessible so that the community can properly and thoroughly scrutinize this project.

Response: *One option for shifting the alignment was developed and is presented as the Southern Bypass. A seventh consulting parties meeting was held on July 31, 2012 to provide an overview of activities that have taken place since project inception; review alternatives (including those that were dismissed early in the process); review changes that were made to Alternative B in response to comments received during the comment period for the June 1, 2012 EA and the June 5, 2012 Public Meeting; provide an update on ongoing cultural resources reports/surveys; and inform the group about recent coordination with the SHPO. Subsequent to the release of the EA, additional efforts to minimize the roadway section through the Woodlawn Historic District have occurred and are documented in the Section 106 Programmatic Agreement.*

Comment: The three alternatives were not developed or documented equitably in the EA. An example is Table 7-1, which only covers the Alternative B. No data is provided for Alternatives A or C. In several instances, the EA does not include data because, as the EA reports, either none had been gathered or further study/research was required (e.g., archeological deposits, wetlands impact, Chesapeake Bay Protection Areas jurisdictional determination, wood turtle habitat survey). Decision-making should come after data gathering is complete and should be based on factual (not projected) information. The EA does not document a rigorous, comprehensive analysis in accordance with the statutory requirement for an environmental assessment and provides at least the perception of pre-selection.

Response: *In response to comments received from project stakeholders, additional analysis was completed and refinements were made to the Preferred Alternative. This information is presented in a Memo-to-File. The additional coordination and analysis did not result in any significant changes to the affected environment or impacts of Alternative B that would change the impact analysis presented in the EA.*

Alternatives and Alternatives Development:

Comment: Not enough alternatives were developed, i.e., the three alternatives are insufficient and inadequate, and there was a lack of thorough assessment of the alternatives being considered and lack of detailed justification. Consider elevating Route 1 through Woodlawn Historic District, flyovers, provision of directional ramps to eliminate left turns to Fort Belvoir, providing a center turn lane or reversible lane during the rush hour, reduced speeds limits, and signal improvements/optimization, among others.

Response: *The National Environmental Policy Act and its implementing federal regulations with respect to Environmental Assessments do not require evaluation of alternatives. Notwithstanding, alternatives were considered and evaluated in the EA, as described in Section 2. In addition, improvements to this section of Route 1 have been studied since the late 1990s, most of which included the consideration and evaluation of alternative improvements. The Route 1 Corridor Study was completed in 1997. Subsequently, the U.S. Route 1 Location Study was completed in 2003, which incorporated the objectives of a centerline design study with environmental analyses and documentation of potential impacts. Finally, an Environmental*

Assessment (EA) associated with the section of Route 1 from Belvoir Woods Parkway to the Capital Beltway was approved for public availability on March 28, 2003, and a public hearing was held on April 29, 2003. The 2003 EA recommended widening the existing four- and six-lane undivided highway to a six- and eight-lane divided highway, with a sidewalk on one side and a trail on the other. A National Environmental Policy Act (NEPA) decision document was not signed for this section and no recommendations were advanced or approved.

Comment: The EA should include at least one alternative that meets the purpose and need of the project and does not impact any historic properties, especially properties within National Register Historic Districts. This has not been done. Project planners need to consider the fact that not all project purposes and needs are equal in weight. The purposes and needs should be ranked in levels of importance, like historic properties are. More effort needs to be put into developing alternatives that reflect this, such as different alignments, separate alignments, narrower alignments, alignments that go around instead of through the Historic District, a narrower median, elimination of the median, and fewer multiple turning lanes.

Response: *As documented in the Section 4(f) Evaluation, it is not feasible to meet the purpose and need for the proposed action and avoid impacting any historic properties.*

Comment: Widen Route 1 on existing alignment on the Woodlawn Plantation side, not on the Woodlawn Stables side. The Plantation itself would not be impacted and moving the Grand View House would not affect its importance. What is historic is the buildings and cemetery, not the land per se.

Response: *The 126-acre Woodlawn Plantation property includes two parcels, one on each side of Route 1. The entire National Register for Historic Places (NRHP)-listed Woodlawn Plantation property on both sides of Route 1 contributes to the Woodlawn Historic District. However, the parcel on the north side of Route 1 also is designated a National Historic Landmark (NHL) (the parcel on the south side of Route 1, which contains the pasture and stables, is not part of the NHL designation). As such, the northern section is afforded greater protection and is subject to special statutory requirements in Section 110(f) of the National Historic Preservation Act. Under these requirements, federal agencies must, “to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking.”*

Notwithstanding, a modified widening of Route 1, on existing alignment, between Mount Vernon Memorial Highway and Belvoir Road (modified segment of Alternative C) was investigated. This modified Alternative C segment shifted the widening towards the Woodlawn Baptist Church rather than into the area of the National Historic Landmark property, thereby reducing the area of roadway right-of-way use of historic landmark property but increasing the use of area from the eligible historic district property by an approximately equal area. This modification results in placing the road right-of-way in very close proximity to the Woodlawn Baptist Church building.

Comment: Widen Route 1 on existing alignment and eliminate or reduce median and retaining walls so that Woodlawn Baptist Church land and its cemetery are not disturbed.

Response: *Each build alternative considered for evaluation in the EA has a 32-foot wide median, which would be reserved for future transit on Route 1 in accordance with the Fairfax County Comprehensive Plan. The Policy component of the Comprehensive Plan under Transportation indicates a 176-foot-wide typical cross section for the Route 1 Enhanced Transportation Corridor from Huntington Metrorail Station to I-95. The median width indicated*

in the typical section is 58 feet. The reduced width of the median in the alternatives presented in the EA is consistent with the Memorandum of Agreement (MOA)⁵ previously negotiated between the Army and VDOT in conjunction with the necessity to set aside right-of-way for the Route 1 widening when the new Gunston Road bridge was designed and constructed. Since the MOA allows for widening to more than 148 feet at intersections, it was agreed that 32 feet would be adequate to accommodate two transit travel ways (26 feet) plus a 3-foot buffer/separation on each side of the travel way and platforms would be accommodated at intersections and where the roadway can be wider than 148 feet.

Notwithstanding, the Preferred Alternative, Alternative B, includes the Southern Bypass Alignment, which bypasses and does not disturb the Woodlawn Baptist Church and Cemetery.

Comment: Remove the Woodlawn Historic District section from the project and address widening in that section as part of the Route 1 widening project north of Woodlawn to Buckman Road or after a transit study is completed.

Response: The project termini are logical because Telegraph Road and Mount Vernon Memorial Highway are major decision points for turning traffic, and this section serves U.S. Army Garrison Fort Belvoir via Pohick Road (Tulley Gate) and Belvoir Road (Pence Gate), with a third gate to access North Post currently undergoing design. Furthermore, Telegraph Road was selected at the south end where widening to six lanes has already occurred, and Mount Vernon Memorial Highway was selected at the north end to connect to completed Mulligan Road.

The available funds have been approved for improvements to Route 1 between Telegraph Road and Mount Vernon Memorial Highway. The applicability of the funds to a specific section of road is not, in this case, set by the Federal Highway Administration, Fairfax County, or the Virginia Department of Transportation. The U.S. Office of Economic Adjustment (OEA) within the Department of Defense awarded the \$180 million dollars for improvements to Route 1 within this section to improve patient access to medical care and to accommodate the increase in traffic resulting from other BRAC-related traffic and growth in Fairfax County. The fundings' conditions are consistent with and support the project's purpose and need.

The 2011 Metropolitan Washington Council of Governments' Constrained Long Range Plan includes widening the four-lane section of Route 1 between Telegraph Road and Mount Vernon Memorial Highway to six lanes by 2020. The section just to the north of the study area, between Mount Vernon Memorial Highway (Route 235 south) and Mount Vernon Highway (Route 235 north) is included in the plan as a separate project to be widened to six lanes by 2025.

Comment: Reopen gates and access into/through Fort Belvoir (Beulah Road).

Response: The Army permanently closed Beulah Street and Woodlawn Road between U.S. Route 1 and Telegraph Road to public traffic for security reasons following the events of September 11, 2001. The Army, VDOT, Fairfax County, and the local community agreed that restoration of the connection between Route 1 and Telegraph Road was necessary, and Mulligan Road (Richmond Highway-Telegraph Road Connector), which is currently under construction, will serve as that new connection. The four-lane replacement road will travel along the same

⁵ Memorandum of Agreement between the Department of the Army and the Commonwealth of Virginia Department of Transportation for Construction of Roadway Improvements at the Intersections of Pohick Road and Barta Road with Richmond Highway/Route 1, Construction of a New Five-Lane Bridge on Gunston Road Over Richmond Highway/Route 1, and Construction of the Route 1 Widening Project, August 18, 2010 (included as Appendix A of the EA).

alignment as Old Mill Road (State Route 619) from Route 1 to Pole Road (State Route 622) and on new location from Pole Road north to Telegraph Road. Mulligan Road is expected to be completed by July 2013.

Comment: Increase and incentivize transit/alternative modes of travel/telecommuting, especially into Fort Belvoir. Use public transportation options, such as mass transit, to solve this problem and complete a transit study.

Response: *The Army, as part of its mitigation for the BRAC actions, has appointed a transportation demand management coordinator and is developing a transportation management plan (TMP) at Fort Belvoir to promote various vehicle trip reduction strategies (e.g., ridesharing, parking management, and use of alternative travel modes). The TMP is part of the Fort Belvoir Master Plan and accompanying Environmental Impact Statement, which are expected to be completed in 2013.*

Route 1 has been the subject of numerous roadway and transit-related studies and efforts. Currently, Metrobus and Fairfax Connector offer bus service along the project corridor, and service adjustments were launched by both agencies in response to the increase in base personnel and the opening of the new Fort Belvoir Community Hospital. Transit is an important component of overall transportation improvements in the Route 1 corridor and the build alternatives include a reserved median for implementation of light rail or other transit modes. However, while provisions are being made to accommodate future transit, transit itself is not part of this project and its implementation within the roadway corridor would be examined by others as part of separate studies. In the near-term, if the Route 1 project area is widened to six lanes, the typical section would then match the adjacent sections of Route 1 and increase the potential to successfully utilize one of those lanes for enhanced public transit. For further information on Fairfax County's Countywide Transit Network Study, go to <http://www.fairfaxcounty.gov/fcdot/2050transitstudy>. In addition, information on the ongoing Super NoVa Transit/TDM Plan, which is examining safe, strategic, and seamless mobility options for rail, transit, and TDM in the greater northern Virginia region, can be found at <http://www.supernovatransitvision.com/>.

Comment: Include safety improvements along the corridor, such as sidewalks, bike path, bus stops, signage, and lighting.

Response: *The purpose of the proposed project includes implementing facilities for pedestrian and bicycle travel and providing space for future transit services pursuant to Fairfax County's Comprehensive Plan. In addition, the design objectives that must be met in order for this project to be considered a success include not precluding transit services in the Route 1 corridor, including provisions for bicycle and pedestrian movements, and improving safety by reducing congestion and meeting minimum design standards.*

As shown in the conceptual design plans, the project includes a 10-foot asphalt multi-purpose trail on the north side, a 5-foot sidewalk on the south side, and a 14-foot outside travel lane to accommodate bicycles. The proposed project would also allow for the designation of the project's proposed multi-use trail as a segment of the Washington-Rochambeau Revolutionary Route National Historic Trail and the Potomac Heritage National Scenic Trail.

Comment: What about traffic lights or something to assist homeowners exiting Mill Towns Court townhomes or Garden Mill apartments?

Response: *Federal guidelines establish minimum conditions under which signal installation should be considered, and these guidelines help identify potential locations for signals. As part of the Route 1 Improvements Project, some roadway intersections would be reconfigured and*

some driveway entrances on Route 1 would be closed or relocated to enhance safety and traffic operations for Route 1. These types of decisions will be made during final design.

Comment: The new ramp from Route 1 to Telegraph Road denies access to Belvoir Woods Parkway, and ultimately, The Fairfax.

Response: *The Preferred Alternative, Alternative B Modified, does not include the flyover ramp at the Telegraph Road intersection and will not change access from Belvoir Woods Parkway to Telegraph Road.*

Comment: Providing bicycle facilities is appreciated, but 14-foot lanes are not sufficient. Minimum needed is a 15-foot outside lane (11-foot travel lane beside a 4-foot bike lane).

Response: *Bicycle facilities were accommodated to the extent possible. The roadway section will be further refined during final design.*

Comment: Remove or reduce pedestrian, bicycle, and future transit right-of-way from the plan.

Response: *Elimination of the pedestrian and bicycle components and transit right-of-way would be contrary to the purpose of the project, which is to expand roadway capacity to accommodate travel demand, facilitate access to medical and other facilities on Fort Belvoir, implement facilities for pedestrian and bicycle travel, and provide space for future transit services pursuant to Fairfax County's Comprehensive Plan. As part of the project scoping process, public input was gathered on transportation problems and deficiencies in the study area, and congestion ranked first, with construction and the influx of traffic from BRAC cited as primary contributors. Other leading deficiencies included the lack of public transit and pedestrian/bicycle access and crosswalks at intersections.*

Comment: Overall traffic flow in the Route 1 corridor is not improved if only this project is completed. What happens with the bottlenecks on either end of the project? This project does not solve but further exacerbates congestion at the I-95/Route 1 interchange.

Response: *The available funds can only be used in the project corridor between Telegraph Road and Mount Vernon Memorial Highway. The applicability of the funds to a specific section of road is not, in this case, set by the Federal Highway Administration, Fairfax County, or the Virginia Department of Transportation. The U.S. Office of Economic Adjustment (OEA) within the Department of Defense awarded the \$180 million dollars for improvements to Route 1 within this section to improve patient access to medical care and to accommodate the increase in traffic resulting from other BRAC-related traffic and growth in Fairfax County. The funding conditions are consistent with and support the project's purpose and need.*

Comment: The underpass component of the Bypass is not a viable option because it is not safe for horses (dangerous reaction to tunnel, light, noise changes, etc.) and inexperienced young riders. Equestrian consultants should be hired to develop better options and determine what needs to be done to keep the stables in operation.

Response: *The Southern Bypass Alignment has been shifted to minimize impacts to the property on which Woodlawn Stables currently operates. As a result of the reconfiguration of the curve, the underpass component is no longer essential to maintain operations as Woodlawn Stables. Since the completion of the June 1, 2012 EA, conceptual designs for the reconfiguration of the property in order to continue equestrian operations, including new access to the site from Mount Vernon Memorial Highway, have been developed by an equestrian consultant in cooperation with the National Trust for Historic Preservation (NTHP), the owners of the property, and Save Woodlawn Stables, an interested party. Any decisions on the ultimate configuration of the property and possible use or redevelopment on the property outside roadway right-of-way would be made further along in the design process.*

Comment: How does the bypass meet the restrictions to design, color, etc. due to historical preservation (similar to how homes in the area are restricted)?

Response: *The bypass is not subject to local historic overlay zoning regulations; however, the design specifications have been negotiated as documented in the Section 106 Programmatic Agreement.*

Comment: Why can't an area north of the Southern Bypass be provided to accommodate Woodlawn Stables instead of bifurcating the stables property? Re-location of the highway to the east will further divide the property, creating two separated parts with little obvious affinity for each other, and diminishing yet again the presence, power, and perceived significance of the property.

Response: *The Southern Bypass Alignment has been shifted to minimize impacts to the property on which Woodlawn Stables currently operates. As a result of the reconfiguration of the curve, the property will not be bifurcated and the underpass component is no longer essential to maintain operations as Woodlawn Stables. Since the completion of the June 1, 2012 EA, conceptual designs for the reconfiguration of the property in order to continue equestrian operations, including new access to the site from Mount Vernon Memorial Highway, have been developed by an equestrian consultant in cooperation with the National Trust for Historic Preservation (NTHP), the owners of the property, and Save Woodlawn Stables, an interested party. Any decisions on the ultimate configuration of the property and possible use or redevelopment on the property outside roadway right-of-way would be made further along in the design process.*

Natural Resources:

Comment: Construction of the Southern Bypass would contribute to the loss of remaining open space, forests, streams, and wetlands in an already diminished habitat. Concern over impacts to bald eagles nesting on stables land, in addition to numerous other species, and the ability of wildlife to adapt to a new road.

Response: *The Southern Bypass Alignment has been shifted closer to existing Route 1 to minimize impacts to the property on which Woodlawn Stables currently operates. In addition, the one larger stormwater management pond has been replaced with two smaller ponds on the edges of the open areas. With the current proposed design, Route 1 would bypass Woodlawn Baptist Church and go through the two non-contributing barns of the Sharpe Stable Complex (the four historic structures within the complex – the dairy, corncrib, bank barn, and ca. 1955 stable – would not be displaced). As such, there would be minimal impacts to the existing pasture and open space on the property.*

With respect to impacts to aquatic wildlife, all practicable measures would be taken to avoid and minimize impacts to aquatic resources. FHWA would minimize affects to aquatic resources by following Best Management Practices (BMPs) and implementing appropriate erosion and sediment control practices in accordance with state and local regulations.

In terms of terrestrial habitat, the majority of the area located in the limits of disturbance is the previous alignment and other developed areas. Both Alternative B and Alternative C would expand beyond the boundary of the existing right-of-way; construction would be limited to habitat edges and would not further divide existing undeveloped areas. Selective vegetation clearing would be practiced to minimize habitat alterations, and native plants would be used to

reseed disturbed areas to facilitate habitat regeneration. An underpass would also be provided allowing animals to cross beneath the road.

In accordance with Fort Belvoir's tree protection policy, trees removed because of this action would be replaced on a 2:1 basis. If it is not possible to plant the required number of replacement trees, project-related alternatives such as environmentally-beneficial restoration, enhancement, or preservation measures may be employed. Fort Belvoir's Department of Public Works' (DPW) approval of out-of-kind, compensatory mitigations is required and funding must be equivalent to that required to plant the remaining trees. DPW maintains a list of mitigation options and restoration sites.

Comment: The intangible benefits (quality of life, community, recreational, green/open space, wildlife, and financial contribution to the community) of Woodlawn Stables and the property are not considered in the EA or given enough significance.

Response: *The entire National Register for Historic Places (NRHP)-listed Woodlawn Plantation property on both sides of Route 1 contributes to the Woodlawn Historic District. Both the EA and the Section 4(f) Evaluation (included as Appendix C of the EA) considered the impacts of the project on Woodlawn Historic District. On the whole, Alternative B, both before and after mitigation, would result in less harm to the activities, attributes, and features of the Woodlawn Historic District than would Alternative C. Specifically, the overall acreage of Section 4(f) land used by Alternative B in the Woodlawn Historic District would be less, the acreage of land from the National Historic Landmark portion of the District would be less, the displacement of graves in the contributing Woodlawn Baptist Church cemetery would be avoided, the distance to the Woodlawn Quaker Meetinghouse would be greater, and the impact to the Woodlawn Baptist Church property would be less severe.*

In an effort to minimize impacts to Woodlawn Stables, following the completion of the June 1, 2012 EA, the alignment of the Southern Bypass was shifted closer to Route 1 after it bypasses Woodlawn Baptist Church, thereby minimizing impacts to the commercial equestrian facility. In addition, conceptual designs for the possible reconfiguration of the property in order to continue operations, including new access to the site from Mount Vernon Memorial Highway, have been developed by an equestrian consultant in cooperation with the National Trust for Historic Preservation (NTHP), the owners of the property, and Save Woodlawn Stables, a consulting party with an interest in the stables. Any decisions on the ultimate configuration of the property and any use or redevelopment on the property outside roadway right-of-way would be made further along in the design process.

Comment: Concern over lack of stormwater management; runoff will cause local flooding upstream and toxins will be washed into Dogue Creek.

Response: *Stormwater from the existing roadway surface in the project area is currently not treated. Seven stormwater management ponds are being constructed in conjunction with the proposed roadway improvements and would collect and treat the stormwater from the new impervious area as well as from the existing impervious area. At the Route 1 crossing of Accotink Creek, which currently experiences flooding issues, the existing bridge would increase in length from approximately 60 feet to approximately 500 feet. A minimum of eight feet of vertical clearance would be provided at the Creek to improve hydrologic function and provide connectivity between wildlife habitats.*

Comment: Has anyone given any thought to the numerous underground springs in this area?

Response: *Wetlands and waters of the U.S. were delineated for the project area. Extensive geotechnical investigations have also been completed.*

Comment: Concern over impacts to wetlands, floodplains, and Chesapeake Bay watershed.

Response: *Construction staging in wetlands, floodplains, or Resource Protection Areas (RPAs) would not be permitted. In terms of long-term effects, the project would provide compensatory wetland and stream mitigation, on-site or through the purchase of credits from a mitigation bank.*

Comment: The stormwater management ponds slated for the stables should be large enough and shallow enough to preclude fencing and thus taking of the area and to allow its continued use for grazing or agricultural purposes.

Response: *As outlined in the Section 106 Programmatic Agreement, mitigation for possible impacts to existing land uses on National Trust for Historic Preservation property has been agreed upon, which includes selecting the location and design of stormwater management ponds or drainage areas that minimize the total disturbance of natural vegetation and soil within the boundaries and viewshed of the Woodlawn Historic District so as to minimize adverse effects.*

Comment: A large stormwater management pond at Mount Vernon Memorial Highway further accentuates the effects of removing useable land and forms an unattractive visible foreground for the National Historic Landmark site to the north of the highway. If exceptions cannot be secured for elimination of storm water management ponds within the Historic District, then the ponds should be placed fully underground and not visible.

Response: *Alternative B Modified, which shifts the Southern Bypass closer to existing Route 1, eliminates the larger stormwater pond at the Route 1 intersection with Mount Vernon Memorial Highway and replaces it with two smaller ponds that do not impact the pastures and open areas south of the roadway. As outlined in the Section 106 Programmatic Agreement, mitigation for possible impacts to existing land uses on National Trust for Historic Preservation property has been agreed upon, which includes selecting the location and design of stormwater management ponds or drainage areas that minimize the total disturbance of natural vegetation and soil within the boundaries and viewshed of the Woodlawn Historic District so as to minimize adverse effects; landscaping to rehabilitate the setting and maintain viewsheds; and design of gateways into the historic district, including, but not limited to lighting and the size and location of sidewalks, trails, fences, and signs.*

Comment: There is an ancient patch of Native Wild Ginger east and north of Accotink Creek on the north side of Route 1 that should be saved and transplanted if necessary.

Response: *According to the US Department of Agriculture Natural Resources Conservation Service, both wild ginger and heart-shaped ginger are widely distributed throughout Virginia. The species is not protected federally, nor is it listed by Virginia as a state-listed plant.*

Comment: Include tree planting to replace lost trees.

Response: *Trees that are removed as part of this project will be replaced according to Fort Belvoir Policy Memorandum #27, Tree Removal and Protection, which states that two new trees shall be planted for each live tree four inches in diameter and larger removed through construction. As stated in the memorandum, requirements for size and species will depend upon site characteristics and location. Fort Belvoir Department of Public Works (DPW) will make this assessment. Tree replacements will generally adhere to a prescribed scheme that includes nursery-grown landscape trees for those removed in improved grounds and high visibility areas, and native tree seedlings with a mixture of landscape trees in unimproved grounds. If it is not possible to plant the required number of replacement trees, project-related alternatives such as environmentally-beneficial restoration, enhancement, or preservation measures may be employed. DPW approval of out-of-kind, compensatory mitigations is required and funding must*

be equivalent to that required to plant the remaining trees. DPW maintains a list of mitigation options and restoration sites.

Comment: Alternative B will contribute to global warming.

Response: *Environmental Assessments are intended to focus only on those resources or features that have a likelihood of being significantly impacted. There are currently no federal or state requirements to analyze greenhouse gas emissions for individual transportation projects. Climate change is inherently a global issue that is more appropriately addressed, minimally, at the regional level or even more appropriately at the state or national level by assessing the impact of transportation systems as opposed to individual projects. Further, climate change does not readily lend itself to an analysis at the local level, and national air quality standards have not been established. Relative to the scope of global climate change, any change in greenhouse gas levels as a result of the project are likely to be insignificant, which can be concluded by comparing the anticipated vehicle miles traveled (VMT) and speeds along the project corridor for both the build and no-build conditions. VMT data and relationships to pollutants are presented in the Air Quality Analysis Technical Report (Appendix F of the EA).*

Historic Properties:

Comment: What is the process if exhumation of graves at Woodlawn Baptist Church Cemetery is necessary? Will efforts be made to individually contact the descendants of those buried there? A cemetery archaeologist should be used for any work undertaken in the cemetery.

Response: *Graves would be exhumed in accordance with State and local laws in consultation with the SHPO. Efforts would be made to contact the descendants.*

Comment: There is a possibility that there might be an old cemetery on the other side of Route 1 from Woodlawn Baptist Church.

Response: *A 1960s USGS topographical map contains a cemetery symbol on the north side of Route 1 directly across from the Woodlawn Baptist Church Cemetery. The map does not contain a cemetery symbol at the known location of the Woodlawn Baptist Church Cemetery. As part of the Baptist Cemetery survey that was conducted in 2012, the archaeologists examined and tested the possible cemetery location as indicated on the map. No graves or evidence of graves were documented. FHWA and the archaeologist team believe that the map symbol was intended to mark the Woodlawn Baptist Church Cemetery.*

Comment: Concern over visual impact of the Southern Bypass and that it does not fit surrounding/historical land use (suggest a 3-D model). Also, headlights and high-intensity street lighting will alter the rural quality of the setting and character of the historic site.

Response: *As outlined in the Section 106 Programmatic Agreement, mitigation for possible impacts to National Trust for Historic Preservation property has been agreed upon, which includes selecting the location and design of stormwater management ponds or drainage areas that minimize the total disturbance of natural vegetation and soil within the boundaries and viewshed of the Woodlawn Historic District so as to minimize adverse effects; landscaping to rehabilitate the setting and maintain viewsheds; and design of gateways into the historic district, including, but not limited to lighting and the size and location of sidewalks, trails, fences, and signs.*

Comment: Concern over destroying a historical cemetery in favor of a for-profit business that is a temporary leasee.

Response: *Alternative B Modified, the Preferred Alternative, bypasses Woodlawn Baptist Church and Cemetery.*

Comment: Why is preserving a railroad bridge such an important issue? It seems to be a safety hazard that needs to be removed.

Response: *The Fort Belvoir Military Railroad (FBMRR) (including the existing bridge over Route 1) possesses the necessary significance in order to be considered eligible for inclusion in the National Register of Historic Places (NRHP) under Criterion A as part of a multiple property listing as part of the FBMRR Historic District. Provisions for its removal have been included in the Section 106 Programmatic Agreement: FHWA will seek a capable party willing to relocate and assume ownership of the bridge, and if a capable and willing party cannot be identified, FHWA would demolish the bridge. [Note that prior to its removal or demolition, appropriate Historic American Engineering Record (HAER) documentation would be prepared for the structure.]*

Comment: Proposed amount of disturbance from the construction of the Southern Bypass may damage pre-historic resources in its path.

Response: *All areas within the archaeological APE would be surveyed prior to construction in accordance with the stipulations of the Programmatic Agreement. In addition, if activities related to the implementation of the project, and having the potential to impact archaeological resources, are to occur outside the previously identified APE, FHWA would identify and evaluate archaeological properties prior to initiation of any land disturbing construction activities. If, as a result of testing, archaeological sites are identified that are eligible for listing in the National Register, a plan for their treatment would be developed in accordance with the stipulations of the Programmatic Agreement.*

Air and Noise:

Comment: Concern over air quality due to the project.

Response: *The Washington, D.C. region is designated nonattainment for ozone and small particulate matter (PM_{2.5}). The proposed project would alter motor vehicle travel patterns in the area: by expanding capacity along Route 1 near Fort Belvoir, it would generally enhance intersection function and overall traffic flow relative to the corresponding No-Build Alternative. The project is also predicted to redistribute some of the traffic demand from competing routes to Route 1. The combination of the project's physical and functional changes along the Route 1 corridor would result in some localized increases in the concentrations for directly-emitted criteria air pollutants such as CO and some localized decreases in such concentrations. Assessment of potential impacts with respect to carbon monoxide (CO) and PM_{2.5} show no violations of National Ambient Air Quality Standards arising from the project. Based on FHWA guidance, this project is of a type that would be expected to have low potential for impacts related to mobile source air toxics (MSAT). The project comes from a financially constrained long-range transportation plan that has been found to conform to the State Implementation Plan for attainment and maintenance of the National Ambient Air Quality Standards.*

The temporary air quality impacts from construction are not expected to be significant. Emissions will be produced during the construction of this project by heavy equipment and vehicle travel to and from the site. Earthmoving and ground-disturbing operations will generate airborne dust. Construction emissions are short-term or temporary in nature. In order to

mitigate these emissions, construction activities are to be performed in accordance with VDOT's Road and Bridge Specifications.

The project lies in an area designated by the Virginia Department of Environmental Quality (VDEQ) as an emissions control area for volatile organic compounds (VOC) and nitrogen oxides (NOx) (9 VAC 5-20-206), and as such, all reasonable precautions should be taken to limit the emissions of these pollutants. In addition, for work in this area, the following VDEQ air pollution regulations must be adhered to during the construction of this project: 9 VAC 5-45-760, Cutback Asphalt restrictions; 9 VAC 5-130, Open Burning restrictions; and 9 VAC 5-40-90, Fugitive Dust precautions.

Comment: Concern over noise impacts resulting from the project (especially to homes in the area and within the historic setting).

Response: *No noise attenuation currently exists in the project area. A preliminary noise evaluation was performed as part of this EA, and a more detailed review would be completed during final design. As such, noise barriers that are found to be feasible and reasonable during this preliminary noise analysis may not be found to be feasible and reasonable during the final design noise analysis. Conversely, noise barriers that were not considered feasible and reasonable may meet the established criteria and be recommended for construction. Eight barriers were evaluated along the study corridor and seven barriers were found to be feasible and reasonable.*

Construction activity may cause intermittent fluctuations in noise levels. During the construction phase of the project, all reasonable measures would be taken to minimize noise impact from these activities.

Comment: Noise walls should not be installed in the Mount Vernon/Woodlawn historic area.

Response: *For noise barriers determined to be feasible and reasonable, the affected public would be given an opportunity to decide whether they are in favor of construction of the noise barrier. Only approved barriers would be incorporated into the road project plans. A Programmatic Agreement has been developed for the Preferred Alternative, Alternative B Modified. As such, mitigation has been included for the impacts of the Southern Bypass Alignment on the Woodlawn Historic District, which includes provisions for design workshops wherein discussions can be held regarding the appropriateness and feasibility of sound abatement measures, if such measures are requested by qualifying landowners.*

Comment: Residents of Inlet Cove want to have a say in what sound barriers would look like and state that the barriers should not be located on Inlet Cove land.

Response: *Before final decisions and approvals can be made to construct a noise barrier, a final design noise analysis would be performed. For noise barriers determined to be feasible and reasonable, the affected public would be given an opportunity to decide whether they are in favor of construction of the noise barrier. Approved barriers would be incorporated into the road project plans.*

Noise walls come in various materials, textures, colors, and finishes. The goal is to select an attractive design that blends well with its surroundings. A consistent appearance is also one of the main considerations when the walls are to be used in a long corridor. Due to the type of noise environment, sound wall manufacturing capabilities, and engineering costs, a standard aesthetic design is typically used; however, affected citizens would be surveyed about the walls' color and finish. Suggestions about the walls can be submitted during citizen information meetings and public hearings. These meetings are held periodically as construction plans for a

corridor are developed. If a locality requests an aesthetic finish that is significantly above the standard cost, the affected parties may have the opportunity to fund the difference. Third-party funding is limited to aesthetic and functional enhancements above and beyond that for which FHWA is responsible.

Community Impacts:

Comment: Concern over resale value of homes (Inlet Cove, Lyndam Hill Circle).

Response: Proposed improvements will not physically impact homes in Inlet Cove or on Lyndam Hill Circle. In addition to providing increased vehicular capacity along Route 1, the project will add facilities for pedestrian and bicycle travel and provide space for future transit services pursuant to Fairfax County's Comprehensive Plan. Access to Belvoir Woods, Lyndham Hill, Worthington Woods, and Sumner Crossing from Telegraph Road will also be improved, and proposed improvements will be coordinated with Lyndham Hill, Phase 2.

Comment: A plan should be adopted to preserve Spring Garden Apartments, specifically, and low income housing, generally, in Fairfax County.

Response: Spring Garden Apartments are located north of and outside of the project limits. Within the project limits, Canterbury Square currently contains two Section 8 (low income) apartments, one in the front building and one in the rear building (as of early July 2012). In addition, there are two to three Section 8 apartments within Accotink Village Apartments. Under provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, the project is obligated to provide decent, safe and sanitary replacement housing to anyone who is displaced by a road project.

Comment: What is going to happen to businesses on the left side of the highway going north from the Fairfax County Parkway?

Response: Coordination with Accotink Village redevelopment has been ongoing throughout the project. The acquisition of right-of-way and the relocation of displaced residents and facilities would be completed in accordance with the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (URA), as amended. Assurance is given that relocation resources would be available to all residential, business, and nonprofit displacees without discrimination.

Comment: Soccer fields at Fort Belvoir would be affected by the project.

Response: An existing baseball field would be relocated further from Route 1 and a new soccer field would be constructed on a previously disturbed and now abandoned housing area within Fort Belvoir adjacent to the project.

Comment: The National Trust's plan of further partnership with Arcadia is a way of making money off of the land that now houses Woodlawn Stables. Why wasn't Arcadia's intent to take over the lease not mentioned in the EA?

Response: This information was not presented in the EA because there is no documented agreement regarding the lease.

Construction:

Comment: Construction should not impede the flow of traffic at Fort Belvoir or to any public property or historical site.

Response: Construction is not expected to impede flow of traffic or access to Fort Belvoir or any public property or historical site. Construction activities would be scheduled to minimize

impact on the traveling public and any associated lane closures would be limited to off-peak periods.

Comment: Temporary sidewalks should be provided during construction.

Response: *Every effort will be made to provide safe and accessible facilities for pedestrians and bicyclists traveling in the corridor during construction.*

Comment: Concern over structural impacts to adjacent homes due to heavy construction equipment.

Response: *Construction impacts are not expected to exceed a threshold that would cause structural damage to adjacent homes.*

Comment: What are the dust control requirements for the construction contractor?

Response: *The temporary air quality impacts from construction are not expected to be significant. Emissions will be produced during the construction of this project by heavy equipment and vehicle travel to and from the site. Earthmoving and ground-disturbing operations will generate airborne dust. Construction emissions are short-term or temporary in nature. In order to mitigate these emissions, construction activities are to be performed in accordance with VDOT's Road and Bridge Specifications.*

The project lies in an area designated by the Virginia Department of Environmental Quality (VDEQ) as an emissions control area for volatile organic compounds (VOC) and nitrogen oxides (NOx) (9 VAC 5-20-206), and as such, all reasonable precautions should be taken to limit the emissions of these pollutants. In addition, for work in this area, the following VDEQ air pollution regulations must be adhered to during the construction of this project: 9 VAC 5-45-760, Cutback Asphalt restrictions; 9 VAC 5-130, Open Burning restrictions; and 9 VAC 5-40-90, Fugitive Dust precautions.

Comment: Concern over construction noise on horses (stress) and riders' safety.

Response: *Construction activity may cause intermittent fluctuations in noise levels. During the construction phase of the project, all reasonable measures would be taken to minimize noise impact from these activities.*

Comment: Concern over cost (widening is less costly than construction of a bypass).

Response: *The two build alternatives are similar except at the Telegraph Road and Fairfax County Parkway intersections and within the Woodlawn Historic District. Under Alternative B, Route 1 would be widened to six lanes along the existing alignment, with the exception being the Southern Bypass, and at-grade intersections would be constructed at Telegraph Road and Fairfax County Parkway. The cost associated with Alternative B would be approximately \$99 million. Under Alternative C, Route 1 would be widened to six lanes along the existing alignment and grade-separated interchanges would be constructed at Telegraph Road and Fairfax County Parkway. The cost associated with Alternative C would be approximately \$124 million dollars.*

The flyover intersection options at Telegraph Road and Fairfax County Parkway are part of Alternative C, resulting in a substantial increase in the cost estimate for Alternative C. For the sake of cost comparison between the two options (one each in Alternatives B and C) for the segment of Route 1 between Mount Vernon Memorial Highway and Belvoir Road, it would not be proper to simply compare the total cost of Alternative B vs. Alternative C. A more appropriate cost estimate comparison would be to simply compare the estimated cost of each individual alignment option (each in Alternative B and C) for the segment of Route 1 between

Mount Vernon Highway and Belvoir Road. This cost estimate comparison indicates that these two alignment options are substantially the same cost.

Comment: What is the construction schedule?

Response: *Information regarding the construction schedule will be made available on the project website.*

Attachment 1 – Final Section 4(f) Evaluation

Attachment 2 – SHPO Concurrence Letters

Attachment 3 – Final Section 106 Programmatic Agreement

Attachment 4 – Noise Impact Analysis Technical Report