

Purple Line FEIS - RECORD #661 DETAIL

First Name : William J.
Last Name : Crane
Business/Agency/Association Name : USAG Fort Detrick
Email Address : jennifer.s.adkins.civ@mail.mil
Submission Content/Notes : Classification: UNCLASSIFIED
Caveats: NONE

Dear Mr. Kay,

On behalf of Mr. William J. Crane, Garrison Manager, please accept the attached letter as comments to the Purple Line Final Environmental Impact Statement.

Thank you.

Jennifer S. Adkins
Forest Glen Environmental Coordinator
USAG Fort Detrick Environmental Management Office
301-295-7005 (Forest Glen)
301-339-3552 (Mobile)

Classification: UNCLASSIFIED
Caveats: NONE

Attachments : USAG Forest Glen Purple Line Comments to FEIS 21 Oct 2013.pdf (45 kb)

Purple Line FEIS - RECORD #692 DETAIL

First Name : Victor
Last Name : Weissberg
Business/Agency/Association Name : Prince George's County Department of Public Works & Transportation
Email Address : VWeissberg@co.pg.md.us
Submission Content/Notes : Please find FEIS comments from Prince George's County

Vic Weissberg
Special Assistant to the Director
Department of Public Works & Transportation
9400 Peppercorn Place, Suite 300
Largo, MD 20774
Phone: 301.883.5600
Fax: 301.883.5709

This E-mail and any of its attachments may contain Prince George's County Government or Prince George's County 7th Judicial Circuit Court proprietary information or Protected Health Information, which is privileged and confidential. This E-mail is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient of this E-mail, you are hereby notified that any dissemination, distribution, copying, or action taken in relation to the contents of and attachments to this E-mail is strictly prohibited by federal law and may expose you to civil and/or criminal penalties. If you have received this E-mail in error, please notify the sender immediately and permanently delete the original and any copy of this E-mail and any printout.

Attachments : purple line feis coments and cover letter.pdf (331 kb)



DEPARTMENT OF THE ARMY
US ARMY GARRISON FORT DETRICK
810 SCHREIDER STREET
FORT DETRICK, MD 21702-5000

REPLY TO
ATTENTION OF:

October 21, 2013

SUBJECT: USAG comments to Purple Line Final Environmental Impact Statement

Mr. Henry Kay
Motor Transit Administration
1000 South Charles Street
Tower 2, Suite 700
Baltimore, MD 21201

Dear Mr. Henry Kay:

The US Army Garrison Forest Glen is located at 9000 Brookville Road in Silver Spring, MD with satellite facilities in the Bethesda area. The installation is within 50 feet of the proposed Purple Line corridor and within 1/2 mile of the proposed Lyttonsville Station. We look forward to partnering with local, state, and federal organizations, and synchronizing long term master plans.

Please accept the following comments to the Final Environmental Impact Statement. We would like you to consider mitigating the following during construction: vibration and blasting that could affect medical instrumentation (for example, electron microscopes and other sensitive equipment); air quality, noise and dust particles that could cause employee respiratory concerns; electrical disruption due to possible intermittent service; radio waves with the potential to interfere with sensitive equipment; traffic congestion from construction vehicles and detours interfering with installation access; and water and sewer utility disruptions. These comments address our concerns with crosswalks, traffic lights, sidewalks, ADA compliance, and safety. This will allow increased employee participation in public transportation and improved pedestrian access to the Purple Line stop across from the installation.

I'd like to reiterate that improving public transportation access is important to the 2,000+ servicemembers and civilians who will work on Forest Glen in the year 2020 and beyond. Thank you for your consideration of these impacts to the Forest Glen Installation. I look forward to working with you.

Sincerely,

A handwritten signature in black ink that reads "William J. Crane".

William J. Crane
Garrison Manager,
U.S. Army Garrison Forest Glen

Purple Line FEIS - RECORD #765 DETAIL

First Name : Francoise
Last Name : Carrier
Business/Agency/Association Name : Montgomery County Planning Board
Email Address : alexanderia.murph@montgomeryplanning.org
Submission Content/Notes : Please find the Montgomery County Planning Board Comments to the FEIS attached.

Thank you.

Alexanderia Murph
Principal Administrative Assistant
Functional Planning & Policy Division
Montgomery County Planning Department
8787 Georgia Avenue
Silver Spring, MD 20910

P Please consider the environment before printing this e-mail. Thank you

Attachments : Montgomery County Planning Board FEIS Comments.pdf (215 kb)



MONTGOMERY COUNTY PLANNING BOARD

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

OFFICE OF THE CHAIR

October 21, 2013

Mr. Henry Kay
Maryland Transit Administration
100 South Charles Street
Tower 2, Suite 700
Baltimore, Maryland 21201

Subject: Purple Line Final Environmental Impact Statement (FEIS) & Draft Section 4(f) Evaluation

Dear Mr. Kay:

The Montgomery County Planning Board/Park Commission (hereby referred to as simply the “Planning Board”) is pleased to submit the following comments in response to the Purple Line FEIS and Draft Section 4(f) evaluation. On behalf of the Board, I want to once again express our appreciation for the work of your staff led by Project Manager Mike Madden for their responsiveness, expertise, and overall commitment to this critical and complex project.

The Purple Line is central to the County’s future if it is to grow smart and in a sustainable manner. It is for that reason – as noted in the FEIS - that the Purple Line has enjoyed long standing support in the form of numerous approved and adopted master and functional plans as well as in our on-going work programs like the anticipated resumption of the Greater Lyttonsville Sector Plan.

The Planning Board comments are in part a response to a detailed staff analysis that was presented and discussed by the Planning Board on October 17, 2013. That analysis, in the form of a staff memo, is available on our web site at montgomeryplanningboard.org.

While the FEIS demonstrates that the MTA has made significant effort to avoid or minimize adverse impacts along the right-of-way, additional minimization and mitigation measures must be developed in collaboration with Parks and Planning as design progresses. We expect that MTA will continue to work with both Parks and Planning staff to address these matters during final design, as well as in the Memorandum of Agreement (MOA) to be developed between our agencies. Specifically, we expect MTA to further develop and refine:

- 1) specific impacts to and mitigation for parkland;
- 2) details for stormwater management facilities;
- 3) habitat mitigation compensation;
- 4) details on culverts and bridge design;
- 5) compliance with Section 106 in the case of inadvertent discovery of archaeological sites in the project area; and,
- 6) impacts to the neighborhood centers.

These details are important to ensure that the Purple Line continues to conform with County land use plans and includes appropriate mitigation.

Our specific comments are organized below in a manner that reflects the on-going nature of the project development. Our focus at this point is on the comments directly related to the FEIS and Draft 4(f) Evaluation, while at the same time recognizing that the development of agency-specific MOA's and the Mandatory Referral will be upon us in short order.

Planning Department Comments

Comment 1 – Chevy Chase Lake and Takoma Langley Crossroads Sector Plan Status

The FEIS (page 4-21) lists the Chevy Chase Lake and Takoma Langley Crossroads Sector Plans as “pending approval.” These plans were approved and adopted in July 2013 and June 2012, respectively.

Comment 2 – Bethesda Station

The FEIS Preferred Alternative reflects a Bethesda Station area plan that no longer includes the Capital Crescent Trail above the Light Rail Train in the tunnel under Wisconsin Avenue. The trail instead would cross Wisconsin Avenue at grade – a feature also included in prior adopted master plans. The Planning Department is currently considering another design concept for the station as part of the Bethesda Purple Line Station Minor Master Plan Amendment process. Both designs would represent a change to the Purple Line Functional Master Plan and consideration of both plans as an eventual (if not preferred) outcome is consistent with current policy direction from the Planning Board and County Council.

Comment 3 – Lynn Drive Crossing in Chevy Chase

The master plan recommendation for the at-grade pedestrian crossing of the Purple Line right of way near Lynn Drive was dependent on further analysis of overall feasibility – especially the ability to provide a safe crossing. MTA analysis has indicated the at-grade crossing cannot be provided at the current design speed and the Planning Board concurs that reducing the speed in this section is undesirable.

Comment 4 – Bridges over Connecticut Avenue

The design calling for the bridges over Connecticut Avenue to be placed on fill or box structures is not consistent with prior policy guidance and previous representations and is therefore highly undesirable. The design for this gateway location should be refined to better respond to adopted design guidance in local master plans and prior MDOT supporting technical advice for TOD along this specific segment.

Comment 5 – Master Plan Street B-1 in Chevy Chase Lake

The design for the bridges that carry the Purple Line and Capital Crescent Trail over Connecticut Avenue should accommodate the master planned street B-1 that is proposed to connect Manor Road and Chevy Chase Lake Drive.

Comment 6 – Lyttonsville Maintenance and Storage Facility

The revised concept plan for the Lyttonsville Maintenance and Storage Facility is generally consistent with the latest vision for the area and will be one of the underlying assumptions when work on the Greater Lyttonsville Sector Plan resumes.

Comment 7 – Capital Crescent Trail between Lyttonsville Road and 16th Street

Recently, MTA received communication from CSX that clarifies their position. CSX’s new policy permits them to sell land for a trail as long as it is at least 50 feet from the centerline of their tracks. Based on the new CSX policy, MTA will be able to construct the Capital Crescent Trail between Lyttonsville Road and 16th Street consistent with the Purple Line Functional Plan. This is a very positive outcome.

Comment 8 – Arliss Street

The FEIS is consistent with the current vision for the Purple Line side running alignment on Arliss Street, as recommended in the Long Branch Sector Plan. The Long Branch Sector Plan also includes an acknowledgment that the intersection at the north end of the station platform on Arliss Street is intended to provide both right and left turns into and out of the immediately adjacent parcels and their internal street network.

Comment 9 – Bike Lanes on Piney Branch Road and University Boulevard

We understand that MTA intends to revise its concept plans for a four-lane University Boulevard to include bike lanes on Piney Branch Road and University Blvd, consistent with the Long Branch Sector Plan, and we support this change.

Comment 10 – Access to Long Branch Local Park and Community Center

The Long Branch Sector Plan also recommends that MTA “resolve vehicular access issues to the Long Branch Pool and Recreation Center in light of proposed traffic restrictions along Piney Branch Road associated with the Purple Line”. This issue is addressed further in Comment 12 below and in comments from the Department of Parks.

Comment 11 – University Boulevard Cross Section

The Purple Line FEIS is consistent with the current vision for University Blvd because it is able to accommodate traffic forecasts with improvements to the roadway network. Furthermore, reducing University Blvd from six lanes to four lanes may help implement other aspects of the Long Branch Sector Plan outside of the traffic lanes, including the bike lanes, landscaped panel, sidewalks, and cycle tracks.

Comment 12 - Community Facility and Business Access Challenges

The Department of Parks has recently acquired the property on Piney Branch Road where the Miles Glass Company was previously located in order to partially mitigate the impact on access to the Long Branch Local Park and Community Center. Consideration should be given

to highlighting in the P3 solicitation process those locations along the alignment where alternative design or access concepts would be considered – given the unique challenges associated with those sites. These include the property owners along Arliss Street, the Long Branch Local Park and Community Center on Piney Branch Road, businesses along Bonifant Street with on-street parking, Silver Spring International Middle School on Wayne Avenue, and Rosemary Hills Elementary School on Porter Road and near Talbot Avenue, the Capital Crescent Trail, and the CSX right of way. In general, the Planning Board supports every effort to mitigate access and other impacts to existing community facilities and businesses.

Comment 13 – Noise and Vibration Mitigation

The FEIS identifies potential noise and vibration impacts and includes a commitment to develop appropriate mitigation measures. Technology related to noise and vibration suppression is evolving and efforts should therefore be made in the P3 solicitation to place a premium on responses and unique approaches that advance mitigation measures where feasible. The effort going forward should reflect the fact that this light rail alignment is adjacent to a number of sensitive sites in an evolving inner suburban setting.

Comment 14 – Location and Compatibility of Traction Power Substations

We expect that MTA will continue to work with community stakeholders to identify specific approaches for addressing traction power substation compatibility with the surrounding setting. The following proposed locations (as shown in Table 4-4 of the FEIS) for these stations are in residential settings and are of particular interest:

- Montgomery Avenue – approximately 1,600 feet beyond (east of) Wisconsin Avenue
- Georgetown Branch right of way – approximately 300 feet prior to (west of) Connecticut Avenue
- Approaching CSX tracks (from west) near Kansas Avenue
- Wayne Avenue just past (east of) Cloverfield Road
- Arliss Street just past (east of) Flower Avenue
- University Boulevard just past (south of) Seek Lane

Comment 15 – Public Private Partnership (P3) Procurement

The P3 procurement process should provide a mechanism for consideration of design refinements after the completion of the NEPA process for both the Purple Line and the CCT as noted in the FEIS. In addition and more specifically, the MTA should issue written guidance within the next 30 days on how on-going design refinements will be considered and included (where there is concurrence) during the P3 procurement process.

Comment 16 – Three Affected National Register-Eligible Properties

Staff recommends continued consultation to identify appropriate mitigation measures for the three affected National Register-eligible properties.

Comment 17 – Eight County-Designated Resources

Although not a requirement under Section 106, staff recommends that MTA work with Planning staff to study eight County-designated historic resources to determine whether the project will have an effect on them, and if so, to identify appropriate mitigation measures.

This list includes eight resources that are designated in the Master Plan for Historic Preservation:

Chevy Chase Lake Trolley Station, #35/11
Madonna of the Trails statue, #35-14-2
Bethesda Post Office, #35/14-5
Brooks Photographers, #35/14-6
Community Paint and Hardware, #35/14-7
Tastee Diner, #36/13
Armory Place, #36/14
Little Tavern, #36/16

Comment 18 – Natural Resources

Planning staff has reviewed the sections of the FEIS regarding the natural environment. While we find that MTA has made significant effort to avoid and minimize adverse impacts along the ROW, additional minimization and mitigation details must be developed in collaboration with MNCPPC Parks and Planning for further refinement. We expect that MTA will continue to work with Parks and Planning staff to address these matters during final design, as well as in the Memorandum of Agreement to be developed between our agencies.

The specific design details to be worked through and concurred upon for areas outside of parkland, within the ROW and its perimeter, include:

- details and types of stormwater management facilities;
- additional habitat impact reduction;
- suitable habitat (tree) mitigation compensation;
- details on culverts with springs, seeps and/or perennial streams;
- neighborhood impacts mitigation;
- additional analysis and mitigation measures for secondary or minor activity areas such as the Chevy Chase Lake and Lyttonsville neighborhoods.

Planning staff would also like to see MTA go beyond regulatory minimums regarding but limited to the following areas:

- Noise mitigation measures for residents affected by “Moderate Impacts” (M-23, M-26, M-27A & M-28);
- Mitigation for specimen tree lost throughout the ROW;
- Additional use of “green tracks” beyond the Georgetown Branch where feasible, with preference for use in sensitive areas such as Rock Creek, Sligo Creek, Long Branch,

and Northwest Branch to reduce heavy metals, salt, organic molecules, and nutrients entering the receiving waterways;

- Protection of the colony of herons within the forested floodplain of Coquelin Run in close proximity to the ROW. Implement protection measures to ensure roosting grounds during brooding are undisturbed during the months of May through mid-June.

Comment 19 – Sligo Creek Trail

The Department of Parks and the Planning Department support widening the shared use path on the Wayne Avenue bridge to 14 feet wide, as well as enlarging the receiving area for the trail on the southwest side of the intersection.

Department of Parks Comments

Parks staff appreciates MTA's coordination on park impacts thus far and looks forward to working with MTA throughout the detailed design and construction phases of this project to address park impacts and associated mitigation and minimization measures. Below are the Department's general commitments/conditions, followed by specific impacts expected at each park affected by Section 4(f), and then proposed mitigation for parkland impacts. The Planning Board supports de-minimus findings (with mitigation) for all parks affected by Section 4(f), on the condition that MTA provides adequate mitigation and minimization measures for the project. The Planning Board expects the commitments and mitigation package to be incorporated into the Record of Decision (ROD) and into the MOA.

General Commitments/Conditions

Comment 20 – Stormwater Management/Erosion Control and Sediment Control

M-NCPPC's National Pollution Discharge and Elimination System (NPDES) MS4 permit compels us to incorporate stormwater retrofits for untreated impervious areas into infrastructure improvement projects. MTA should commit to retrofit outfalls onto parkland to treat previously untreated areas of roads, parking lots, etc. prior to discharge onto parkland.

Comment 21 – Forest Fragmentation and Stream Valley Buffer Impacts

MTA should commit to minimize tree loss and limit impacts to natural resources, particularly where the Purple Line project crosses stream valleys. This effort would include providing appropriate tree preservation measures and additional plantings to offset vegetative impacts.

Comment 22 – Stream Crossings

MTA should commit to utilizing environmentally sensitive designs at all stream crossings and improving existing riparian conditions.

Comment 23 – Interim Conditions/Park Modifications

MTA should commit to providing appropriate improvements to existing park facilities to accommodate the Purple Line and restore full functional usage of each park.

Comment 24 – Minimize Disruptions to Park Users

MTA should ensure that park facilities remain open during the construction of the Purple Line project, unless otherwise approved by the Department of Parks. This will involve providing temporary facilities and transitions, detours, public notifications, etc. as needed.

Comment 25 – Technical Review and Park Permits

All construction on parkland will require Parks’ technical review and approval of the proposed designs and issuance of Park Construction Permits. MTA should commit to developing a coordination and review protocol that allows sufficient input throughout the design process in a timely manner with respect to staff workloads. Please note that should MTA desire a “fast-track” review process, they will likely need to provide additional resources to Parks staff, as other public agencies managing large scale projects with parkland impacts have done.

Specific Impacts Expected At Each Park

Comment 26 – Elm Street Urban Park

In addition to the Purple Line, numerous future and proposed projects will be impacting (or may impact) this park. These include developer-funded improvements to the playground, Montgomery County Department of Transportation’s Capital Crescent Surface Trail, a proposed bike share station and possibly a new tunnel route for the mainline Capital Crescent Trail. The sequencing of these improvements is unknown. Therefore, MTA will need to provide an interim condition for the park that adequately provides for safely redirecting the Capital Crescent Trail through the park to 47th Street, while maintaining functional use of the rest of the park. This work shall be completed prior to closing the tunnel under Wisconsin Avenue, to accommodate diverted trail traffic passing through the park.

Comment 27 – Rock Creek Stream Valley Park

Although the Purple Line project will be primarily constructed within the Georgetown Branch right-of-way, it will still have impacts to park resources. MTA’s design should improve stream valley conditions, including removal of the existing trestle bridge abutments in and adjacent to the stream channel to at least 18” below finished grade and appropriate channel stabilization. MTA must also connect the CCT to the Rock Creek Trail and should improve the trail where it passes under the new bridges to reduce sedimentation problems and incorporate sustainable trail design elements. Finally, consistent with Planning Department recommendations, MTA should design the new transit line bridge and Capital Crescent Trail bridge as signature facilities with aesthetic considerations for park users. Likewise, MTA should also design all associated retaining walls in the stream valley with aesthetic consideration for park users.

Comment 28 – Sligo Creek Stream Valley Park

When MTA reconstructs the Wayne Avenue bridge over Sligo Creek to accommodate the Purple Line project, MTA should design the bridge as an environmentally sensitive crossing, realigning the stream in a stable plan form to pass under the new bridge, extend the upstream and downstream limits of stream restoration in consultation with Parks, and provide appropriate grade control, aquatic habitat, and stabilization of the new channel. MTA will need to provide interim conditions to maintain access to the playground, parking lot, and trail during construction. The finished design should provide functional use, stormwater management retrofits for existing untreated impervious areas, and ADA access for the playground, trail, and parking lot areas. Parks staff notes that the Wayne Avenue bridge is entirely on parkland; it is not along a dedicated right-of-way or on an easement.

Comment 29 – Long Branch Local Park & Long Branch Stream Valley Park

The Department of Parks considers the access restrictions to the pool and recreation center to substantially impair the park's operation and substantially diminish the use by park patrons. To provide functional use of the existing park, MTA should reimburse M-NCPPC for the purchase price of the Miles Glass Company property (bought to maintain adequate access). MTA will need to construct a new driveway entrance off Piney Branch Road to align with Barron Street and redesign the existing parking lot to accommodate the widening of Piney Branch Road and the new park entrance. Additionally, MTA should take responsibility for realigning the Long Branch Trail to cross Piney Branch Road at Barron Street and parallel the new driveway as it enters the park. This reconfiguration will also require stormwater retrofits and ADA access for the new park entrance/driveway and the new segment of park trail. The existing box culvert that carries Long Branch stream under Piney Branch Road is inadequate for the drainage it currently conveys, and extending the existing culvert to accommodate the new road/train cross section will further impair the stream system. MTA will need to replace and/or augment the existing box culvert under Piney Branch Road to create an environmentally sensitive crossing and provide stream improvements both upstream and downstream of the road crossing for long term stream stability and fish passage.

Comment 30 – New Hampshire Estates Neighborhood Park

Construction of the Purple Line along University Boulevard will require significant parkland impacts to widen the road's right-of-way. The project also will reconstruct the portion of University Boulevard across the park's frontage. This will restrict pedestrian access and eliminate vehicular access to the parking lot during construction. To provide an interim condition for the park, MTA must provide alternative access to the park's facilities during construction, as well a temporary replacement parking area dedicated to park users. MTA also must provide for functional use of the park following the Purple Line (but preceding the construction of Gilbert Street extended, recommended in the Long Branch Sector Plan). The design must provide full restoration of all amenities directly and indirectly impacted by the Purple Line to create a park user experience equal to or better than the current conditions. MTA also must replace all parkland lost throughout the corridor in the Long Branch community, ideally adjacent to this park.

Mr. Henry Kay
October 21, 2013
Page 9 of 9

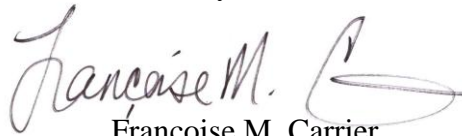
Proposed Mitigation for Parkland Impacts:

- Reimbursement for the purchase of the Miles Glass Company property
- SWM retrofit of the entire Long Branch Local Park
- SWM retrofit for the Long Branch Library site
- SWM retrofit for the untreated impervious areas draining to the existing ditch on the eastern boundary of New Hampshire Estates Neighborhood Park
- Sligo Creek stream restoration between Schuyler Road and Bradford Road

Finally, our staff memo for the Purple Line agenda item on October 17, 2013 includes additional detail on issues more closely related to any Memorandum of Agreement with this or other agencies, and other issues (largely related to the Capital Crescent Trail) in which the Planning Board role is generally advisory in nature. We encourage MTA to review the entire [staff memo](#) as it outlines many issues to be addressed in the development of the upcoming MOA's and the Mandatory Referral.

Thank you again for the opportunity to comment on the Purple Line Final Environmental Impact Statement and Draft 4(f) Evaluation.

Sincerely,



Françoise M. Carrier
Chair

cc: Nancy Navarro, President, Montgomery County Council
Art Holmes, Director, Montgomery County Department of Transportation
Elizabeth M. Hewlett, Chair, Prince George's County Planning Board

Purple Line FEIS - RECORD #1021 DETAIL

Comment Date : 10/18/2013
First Name : Bob
Last Name : Rosenbush
Business/Agency/Association Name : Maryland Department of Planning - Clearinghouse comments
Address : 301 West Preston Street
Apt./Suite No. : Room 1104
City : Baltimore
State : MD
Zip Code : 21201
Email Address : brosenbush@mdp.state.md.us

Submission Content/Notes : Hello Henry: Here are the Purple Line comments that the Clearinghouse has received to date.

From MDE:

1. Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land Management Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.

2. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Waste Diversion and Utilization Program at (410) 537-3314 for additional information regarding recycling activities.

From the Maryland Historical Trust (MHT): MHT is working with MTA to complete the Section 106 review process for this undertaking. The project will adversely affect historic properties. MTA, MHT, and the Consulting Parties are preparing a Programmatic Agreement that outlines commitments and mitigation measures concerning historic and archeological resources under Section 106.

From DNR: MD DNR, through our Integrated Policy and Review Unit, Project Review Division (formerly the Environmental Review Unit), has been participating in the MD Streamlined Process for Transportation Review for the Purple Line project. Comments and review notes have been provided in the past at appropriate stages, and the Division will continue its review efforts as project planning continues. The project in its planning stages has generally remained consistent with the programs of the Department

From MDP: MDP strongly supports the Purple Line project as it will reduce single-occupancy vehicular trips and associated reductions of traffic congestion and greenhouse gas emissions in the Baltimore and Washington region. The Purple Line will stimulate concentrated mixed-use development along the alignment through Transit-Oriented Development (TOD), which will encourage citizens to live, work, shop and play in or near transit-accessible communities. The purple line will help to reduce commuter congestion and reduce the wear and tear on the region's roadways by providing an sustainable, alternative transportation option. MDP has been actively involved in the Purple Line's planning process since project inception and looks forward to working with MDOT and local jurisdictions to support TOD along the transit line.

The Maryland-National Capital Park & Planning Commission, in both Prince George's and Montgomery Counties, will send their comments directly to you.

MSDE, Montgomery County, and the City of Takoma Park (see the attachment) found the project consistent with their plans, programs, and objectives.

DGS had no comment. Our recommendation letter to follow next week. Thanks for your cooperation.

Purple Line FEIS - RECORD #1022 DETAIL

Comment Date : 10/18/2013
First Name : Fern
Last Name : Piret
Business/Agency/Association Name : M-NCPPC - Prince George's County
Address : 14741 Governor Oden Bowie Drive
City : Upper Marlboro
State : MD
Zip Code : 20772

Submission Content/Notes : October 18, 2013

Mr. Robert L. Smith, Administrator Maryland Transit Administration
Maryland Department of Transportation
6 St. Paul Street
Baltimore, Maryland 21202-1613

RE: Purple Line Final Environmental Impact Statement

Dear Mr. Smith:

The Prince George's County Planning Department appreciates the opportunity to review and provide comments on Volumes I and II of the August 2013 Final Environmental Impact Statement & Draft Section 4(F) Evaluation (herein after FEIS) for the proposed Purple Line. This document represents the culmination of more than two decades of work by the Maryland Department of Transportation (MDOT), the Maryland Transit Administration (MTA), Prince George's and Montgomery Counties, The Maryland-National Capital Park and Planning Commission (M-NCPPC), and numerous other agencies and stakeholders.

The Prince George's County Planning Department of M-NCPPC strongly supports the Preferred Alternative for the proposed Purple Line light rail transitway. The Preferred Alternative is a responsive and thoughtful transit alternative to the pressures of continued growth in the Washington Metropolitan Region and offers a remedy to the current lack of east-west connectivity between Prince George's and Montgomery Counties. The No-Build Alternative would result in a significant increase in automobile traffic and commuting travel times, and diminished economic opportunities compared to the Preferred Alternative. The Preferred Alternative would become a vital regional transportation linkage that maximizes the potential for mixed-use, transit-oriented development (TOO) at the 21 proposed stations, 11 of which are located within Prince George's County. As noted in the FETS, Prince George's County continues to proactively plan for the future of numerous proposed Purple Line station areas in anticipation of new TOO and economic development opportunities.

The Planning Department looks forward to continued coordination with MTA during the final engineering design and construction of the Purple Line. At this time, the Planning Department offers the following comments and observations on the FEIS.

Mr. Robert L. Smith
October 18, 2013
Page 2 of 8

Volume I

Executive Summary

I. Page ES-4 of the FETS notes that the Purple Line "transitway, stations, and related infrastructure would be integrated with existing and planned transportation facilities in a manner that accommodates or enhances automobile, bus, bicycle, and pedestrian circulation." Prince George's County and the Planning Department have collaborated with the MTA in the development of recent sector plans for Takoma/Langley

Park, the Central US I Corridor, Central Annapolis Road, and the New Carrollton Metro Station area. Additionally, MTA was a major partner in the development of the 2013 Purple Line TOD Study. These plans and studies advocate multimodal connectivity as essential to the successful implementation of TOD. The Planning Department looks forward to the continued coordination with MTA as the Department develops the staff draft of the update to the 1997 College Park-Riverdale Park Transit District Development Plan, where two of the Purple Line stations are proposed to be located. It is essential that we continue to work closely to ensure convenient, safe, and multimodal access to and from Purple Line stations and adjoining offices, activity centers, and neighborhoods.

2. With regard to subsection ES 4.3, Pedestrian and Bicycle Facilities (pages ES-5 and ES-6), collaboration should continue in order to identify locations where additional sidewalks, bicycle racks, and storage facilities are most appropriate and feasible. Review of the FETS suggests that some stations located in Prince George's County are not as well served by these station access elements:

- River Road- bicycle and pedestrian facilities/connectivity
- Beacon Heights- additional bicycle consideration
- Riggs Road, West Campus/Adelphi, East Campus and Annapolis Road - bicycle racks

We look forward to coordinating with MTA regarding the needed station access facilities as may be appropriate and desired given the intended character of development and anticipated future usage.

3. The funding mechanisms to construct these facilities are as important as the locations of these multimodal transportation facilities. The opportunity exists following the Record of Decision to pursue additional partnerships and funding sources that may provide the ability to improve overall connectivity near Purple Line stations. MTA touches on this need under section ES.7, Next Steps (page ES-9), and the Planning Department is eager to continue working with MTA on project planning and implementation with multimodal connectivity as a major point of emphasis.

1.0 Purpose and Need for the Proposed Action

1. Section 1.3.3 Existing Transit Service (page 1-9) should note that WMATA provides rush hour "Rush Plus" Yellow Line Metrorail service to supplement the Green Line service at the West Hyattsville, Prince George's Plaza, College Park-U of MD, and Greenbelt stations.

2. Figure 1-4, Existing East-West Bus Service (page 1-12) does not show Metrobus Route F4, although paragraph 1 in the left-hand column on page 1-13 mentions the F4 Route as one of two Metrobus routes serving the area between Silver Spring and New Carrollton.

2.0 Alternatives Considered

1. The FEIS identifies "Green Track" as one of the four track types being considered for the Purple Line transitway on page 2-29. We strongly endorse the use of "Green Track" in areas where high-intensity TOD is envisioned and where stormwater management synergies can best be leveraged. Appropriate locations for MTA to consider "Green Track" include areas south of the College Park Metro station along River Road to Kenilworth

Avenue/MD 201, east of the Riggs Road station to the Adelphi Road/West Campus station along University Boulevard /MD 193, and along Veterans Parkway/MD 410 between the Beacon Heights and Annapolis Road/Glenridge stations.

2. Pages 2-32 and 4-170 discuss traction power substations, which MTA commits to build "with landscaping or appropriate architectural treatments to be compatible with adjacent land uses in areas of moderate or high visual sensitivity." We note that the concept of visual sensitivity (as used in the FEIS) is associated with environmental visual impacts, and asserts that the overall character and quality of the built environment and the visual sensitivity of environmentally sensitive

locations are equally important. We encourage MTA to approach the construction of every traction power substation-and every signal building-in Prince George's County as if they were in areas of high visual sensitivity. Unique and interesting architectural treatment; durable, attractive

materials; appropriate landscaping and screening; and architectural compatibility should be incorporated in every one of these structures within the county in order to ensure the highest quality of urban design and to mitigate potential negative visual impact, especially as these areas develop or redevelop.

3. Figure 2-17 on page 2-33 shows the proposed configuration of the Glenridge Maintenance Facility. We suggest that MTA provide appropriate landscaping and screening of the proposed facility and associated parking areas given their high visibility from Veterans Parkway/MD 410, and recommend landscaping treatments in excess of the minimum requirements of the Prince George's County Landscape Manual for this location.

3.0 Transportation Effects

1. Pedestrian safety has been a long-standing concern along the International Corridor (University Boulevard/MD 193) in northwestern Prince George's County. Pedestrian connections a long and across University Boulevard/MD 193 near and between the proposed Takoma/Langley and Riggs Road stations are needed in order to facilitate convenient and safe pedestrian crossings within the

2. Bicycling should be recognized on page 3-7 as a major Station Mode of Access. Bicycle accessibility to proposed Purple Line stations--especially those collocated at Metro stations--is an emphasis of Prince George's County's transportation policies and is particularly important for the University of Maryland, College Park campus stations and the College Park Metro and River Road stations given the proximity of more than 37,000 college students.

3. The Preferred Alternative results in a forecast decrease of 12,243 daily vehicle trips in 2040 in the four areas located in Prince George's County, as compared to the No-Build Alternative. This represents a significant decrease in the projected vehicle trips and, when combined with the 45 minute time savings that may be realized between New Carrollton and Bethesda by 2040, it clearly demonstrates the positive potential transportation benefits of the Purple Line Preferred

Alternative.

4. Table 3-6 on page 3.9 suggests that 15 intersections along the Purple Line transitway will fail (Level of Service F) under the No-Build Alternative by the year 2040-11 in Prince George's County. The Preferred Alternative results in 9 failing intersections with only 5 in Prince George's County; it is noted that 5 intersections are currently failing in the county. This analysis suggests that the Preferred Alternative, when built, will contribute to significantly improved intersection conditions in northwestern Prince George's County along the transitway route.

4.0 Environmental Resources, Impacts and Mitigation

1. Section 4.2.1, Regulatory Context and Methodology (page 4-5) contains outdated regulatory guidance references. In 2012, the Maryland General Assembly repealed Articles 66B and 28 and replaced them with a consolidated Land Use Article. This Land Use Article now provides state-level regulation and guidance applicable to land use within Prince George's and Montgomery Counties.

2. In the first paragraph of the Zoning subsection of 4.2.2, Affected Environment (page 4-14), there is a reference to the 2007 Edition of the County Code of Prince George's County, Subtitle 27. On May 7, 2013 the County Council, sitting as the District Council, enacted CB-9-2013 which officially codified the 2011 Edition of the Zoning Ordinance of Prince George's County, being also Subtitle 27 of the Prince George's County Code.

3. Figure 4-1 on page 4-17 does not accurately reflect the extent of the M Square research and office park north of the M Square Station on the existing land use and planned development map. Properties in this area shown as "commercial" are undeveloped today, whereas some properties classified as "other" are developed with office uses. In general terms, the rest of the major existing land uses depicted for the Prince George's County segment of the Purple Line Preferred Alternative are accurately reflected.

4. Table 4-2, Planned Developments (page 4-19) incorrectly identifies the existing land use for the Cafritz Property Development as "forested area and single-family residential." No single-family residences currently exist on this property. Additionally, the M Square Research Park is not "undeveloped land;" rather, the research park is partially undeveloped and partially developed with more than 500,000 square feet of commercial office space.

5. The proper name of the current sector plan for the US 1 corridor (see pages 4-20 and 4-21) is the 2010 Approved Central US 1 Corridor Sector Plan and Sectional Map Amendment. The pertinent planning document for the Purple Line Corridor as reflected on Table 4-3 on page 4-21 should read "Purple Line Transit Oriented Development Study (May 2013)".

October 18, 2013
Page 5 of 8

6. The discussion on pages 4-14 and 4-22 suggests that Prince George's County continues to follow the policy guidance of the 1964 On Wedges and Corridors, a General Plan for the Maryland- Washington Regional District in Montgomery and Prince George's Counties. Although some of this policy guidance has been implemented since 1964,

and some of the 1964 guidance remained (or remains) in current policy documents, it should be noted that Prince George's County officially established a new general plan for growth and development in 1982. The county's current general plan is the 2002 Prince George's County Approved General Plan, and this is the document that provides countywide policy, land use, and development guidance for Prince George's County.

7. With regard to the earlier comment on traction power substation design and Table 4-4, Proposed Traction Power Substation Locations and Existing Land Use, planning staff are particularly concerned with stations Q12, Q13, Q14, Q17, and Q18 given their proximity to the Central US I Corridor, College Park-U of MD Metro station, Central Annapolis Road Corridor, and New Carrollton Metro station. All of these locations are subject to recent or ongoing master planning efforts that establish development standards to ensure high-quality development.

8. The description of the Preferred Alternative alignment through the University of Maryland, College Park campus on page 4-73 contains an erroneous reference to the Eppley Recreation Center. This facility is located approximately 2 miles to the northwest of the location referenced in the second paragraph of the "Transitway Within the District" subheading on this page.

9. Table 4-49, Ridership Projections (page 4-156), reflects a 48 percent to 93 percent increase in Preferred Alternative transit trips compared to the No-Build Alternative in the four areas located in Prince George's County. These forecast changes are significant and again point to the importance of the Preferred Alternative to the future of Prince George's County.

Volume II

Planning Department staff reviewed the technical documentation and preliminary engineering drawings contained in Volume II of the FEIS to identify potential issues that merit additional discussion and coordination following the Record of Decision.

1. Generally speaking, the engineering plan drawings indicate pavement removal areas along the flanks of the proposed transitway through Prince George's County, but do not indicate what type of surface or vegetation is anticipated to replace the removed pavement. Select illustrative section drawings suggest planted areas but additional discussion is warranted to ensure that potential impacts are minimized and that appropriate replacements to existing paved areas are identified and implemented.

2. The existing pedestrian/bike activated signal along Paint Branch Parkway at the Rhode Island (Trolley) Trail crossing should be identified (drawing CV-54, page 147).

3. The engineering plans for the College Park Metro station (see sheet 150, drawing CY-57) do not show the relocated and reconfigured bus loop that has been the subject of much coordination between MTA, WMATA, and Prince George's County. Additional clarity as to the configuration and location of this bus facility is important since the Planning Department is currently working on

an update to the College Park-Riverdale Transit District Development Plan (TDDP) that guides land use, zoning, and urban design in this location.

4. Consider including a median treatment to prevent mid-block pedestrian crossings along River Road at the western end of the proposed M Square Station (drawing CV-61, page 154).

5. The importance of the segment of the Preferred Alternative between US 1 and Kenilworth Avenue/MD 201 is reinforced by the Planning Department's ongoing work to update the TDDP for the College Park-Riverdale Park transit district. This location is also identified in the 2013 Preliminary Prince George's County Plan 2035 (General Plan update) as part of the county's primary employment area. Properties to be served by the Purple Line along Paint Branch Parkway and River Road are of utmost importance to the economic and TOD future of Prince George's County.

A major concern in this area is the open drainage typical section for the Purple Line along River Road (see drawings CV-59 through CV-62, pages 152 through 155) in the vicinity of the proposed M Square Station platform, because the abutting land is planned to be developed with frontage on River Road. A drainage ditch and cut slope is proposed that, at most locations along River Road, is contrary to best practices for TOD design and site preparation. This design would detract from development of these properties with a high-intensity mix of uses and sever new development from direct access to sidewalks, bike lanes, and the M Square Station. The open drainage typical section design would be an element that runs counter to the feedback and input that the TDDP update team is hearing from residents, property owners, elected officials, and other stakeholders.

MTA is encouraged to reconsider the design of this entire segment of the Preferred Alternative to provide for a more urban solution to any stormwater management issues that may have led to the proposed open drainage typical sections. The incorporation of "Green Track", as previously recommended, is one way to help mitigate any impacts, and planning staff is eager to work with MTA to identify additional positive solutions.

6. Utilize decorative architectural retaining walls where opportunities exist along Kenilworth Avenue/MD 201 and MD 410 (drawings CV-63 thru CV-68, pages 156-161), possibly with themes from the approved Anacostia Trails Heritage Area (ATHA) Management Plan. Public artwork along Kenilworth Avenue and MD 410 can support the implementation strategies contained in the approved ATHA Management Plan. Such strategies could include the creation of interpretive trails systems and a transit rider's guide to ATHA (see page 16 of the ATHA Plan). Consider the use of decorative panels on both sides of the raised approaches to the East-West Highway/MD 410 overpass bridge (drawing CV-65, page 158).

7. Consider installation of a pedestrian-activated traffic signal and crosswalks on all approaches along East-West Highway/MD 410 at Riverdale Road (drawing CV-66, page 159).

8. Drawing CV-67 (page 160) suggests that no pedestrian improvements are planned on this segment of Riverdale Road/MD 410.

However, there is an existing dirt pathway on the south side of the roadway, and consideration should be given to providing a paved sidewalk to formalize this passage and ensure safer pedestrian connectivity. It is our understanding that SHA desires to have

October 18, 2013
Page 7 of 8

both on-road bike lanes and a sidepath along MD 410 in some situations. In the event that such a 'dual-route facility' cannot be accommodated, we are recommending the provision of a 10-foot wide multi-use pathway (sidepath) between the Riverdale Park Station and the Annapolis Road Station. However, if some sections of this pathway are required to be narrower than 10 feet, then they should be signed accordingly for safety. This pathway should be illuminated along its entire length.

9. Consider using the shoulder to be provided along Riverdale Road/MD 410 (drawing CV-68, page 161) as a marked bicycle lane.

10. Consider direct alignment for extension of 641 Avenue to Patterson Street in lieu of the proposed s-curve alignment (drawing CV-69, page 162).

11. A shared use path should be considered along Riverdale Road /MD 410 between (at minimum) Veterans Parkway/MD 410 and the Baltimore-Washington Parkway (drawings CV-70 and 71, pages 163 and 164) because the right-of-way in this location is too narrow to accommodate on-street bicycle lanes and the traffic conditions likely preclude shared roadway usage.

12. Consideration should be given to providing a landscape buffer along the north side of Riverdale Road /MD 410 along and west of the intersection with Veterans Parkway/MD 410 drawing CV-71, page 164).

13. Consider installation of a traffic signal along Riverdale Road /MD 410 at General Access Road (drawing CV-75, page 168).

General Comments/Considerations

1. The inclusion of bicycle parking facilities along the rights-of-way of state and county roads should be pursued where needed and feasible. MTA has done an excellent job of providing the conceptual improvements to the rights-of-way, including bicycle parking along MD 193 that will make the areas near the proposed stations more accessible and usable for modes of transportation other than the automobile.

2. Consider utilizing LED or other high visibility safety signage to warn pedestrians and bicyclists of oncoming trains and to control busy track crossings.

3. Consider utilizing channeling devices to help encourage desired safe behavior in pedestrians when they attempt to cross rail tracks. One example is the use of horizontal swing gates with high visibility markings to indicate the direction from which the train would be entering the stations. This can reduce incidents related to inattention at locations that pedestrians have been routed to by the station design and wayfinding.

These swing gates are operated by the pedestrian and can reduce the number of "dart outs" into the path of an oncoming train .

4. Continue to work with the county to identify appropriate drop off locations near some stations where feasible.

October 18, 2013
Page8of8

5. Finally, the most important quality of service factors for passengers as they relate to the design of the project should be identified. There are many of these factors to be considered, such as safety from crime at stations and platforms, signs and information, and transfer issues. See TCRP Report 47 - Chapter 2- Quality of Service Factors.

The Prince George's County Planning Department of the M-NCPPC appreciates the opportunity to comment on the FEIS and our staff looks forward to future coordination with MTA on station area development and access planning during the review of the engineering plans for the Purple Line. If there are any questions, please contact Mr. Eric Foster of the Transportation Planning Section at 301-952-3117 or eric.foster@ppd.mncppc.org, or Mr. Derick Berlage, Chief of the Countywide Planning Division at 301-952-4711 or derick.berlage@ppd.mncppc.org.

Sincerely,
!1.d--
Fern Piret
Planning Director

c: Elizabeth M. Hewlett, Chairman, Prince George's County Planning Board
Ronnie Gathers, Director, Department of Parks and Recreation
Vanessa Akins-Moseley, Special Program Coordinator, Strategy and Implementation
Derick Berlage, Chief, Countywide Planning Division
Ivy Lewis, Chief, Community Planning Division
Eric Foster, Supervisor, Transportation Planning Section
John Kaii-Ziegler, Supervisor, South Section, Community Planning Division
Faramarz Mokhtari, Planner Coordinator, Transportation Planning Section
William Washburn, Planner Coordinator, Central Section, Community Planning Division
Chad Williams, Planner Coordinator, North Section, Community Planning Division
Hyojung Garland, Senior Planner, North Section, Community Planning Division
Dan Janousek, Senior Planner, Transportation Planning Section
Victor Weissberg, Special Assistant to the Director, DPW&T

Purple Line FEIS - RECORD #1037 DETAIL

Comment Date : 10/29/2013
First Name : Barbara
Last Name : Rudnick
Business/Agency/Association Name : Environmental Protection Agency
Address : 1990 K Street, NW
Apt./Suite No. : Suite 510
City : Washington
State : DC
Zip Code : 20006

Submission Content/Notes : Dear Misers Koenig and Kay:

In accordance with Section 102(2) (C) of the National Environmental Policy Act (NEPA), 42 U.S.C. § 4332(2) (C), Section 309 of the Clean Air Act, 42 U.S.C. § 7609, and the Council on Environmental Quality (CEQ) regulations, 40 CFR Parts 1500-1508, the United States Environmental Protection Agency (EPA), has reviewed the Final Environmental Impact Statement (FEIS) for the above referenced project. The FEIS was prepared by Federal Transit Administration (FTA) and is dated December 2012. EPA reviewed the September 2008 Alternatives Analysis/ Draft EIS, and submitted a comment letter dated January 14, 2009. In this letter EPA rated the DEIS as "L0-1" (Lack of Objections-Adequate), according to the EPA rating system described on the website www.epa.gov/compliance/nepa/comments/ratings.html.

The FEIS analyzes two alternatives, including the no build alternative and the preferred alternative. The preferred alternative involves the construction and operation of a new light rail transit corridor over 16.2 miles from the Bethesda Metrorail station in Montgomery County to the New Carrollton Metrorail/MARC/Amtrak station in Prince George's County. Adverse environmental impacts to ecological resources resulting from the preferred alternative are relatively low. Stream impacts are approximately 5,507 linear feet, wetland impacts of 0.88 acres, forest impacts of approximately 48 acres, and 8.63 acres of park acquisition. EPA recognizes that updated and detailed analysis for many resources has been completed since the DEIS and that while several resource impacts have been decreased, some, including parks, have increased. Additional avoidance and minimization techniques should be incorporated where practicable, and appropriate mitigation developed, as the project moves forward.

EPA recognizes efforts made to evaluate and address community concerns and impacts, to coordinate this project with the community and resource agencies, and detail avoidance and minimization efforts as well as mitigation. EPA has appreciated efforts to present updated project information and developments at Interagency Review Meeting. EPA would be pleased to continue to be involved in the project as well as participate in more detailed development of wetland and stream compensatory mitigation. We appreciate efforts taken to improve and update the environmental justice analysis and the cumulative effects analysis for the FEIS using most recently available data.

The FEIS includes mitigation for long-term operational impacts as well as construction effects; however, there still remains a great deal of information that should be or is planned to be shared with the public, including information regarding noise, vibration, utility disruptions, and traffic and pedestrian movements. EPA suggests that FTA and Maryland Transit Administration (MTA) consider the best ways to share and communicate relevant information, which may not yet be available, with the public and local stakeholders after the Record of Decision (ROD) and during construction. EPA supports memorializing environmental and community commitments in order to ensure that the efforts and mitigation identified in the FEIS are carried forward during future phases. We understand that a Transportation Management Plan (TMP) and Environmental Compliance Plan (ECP) will be developed after the ROD and prior to the initiation of construction. Please find additional suggestions for your consideration regarding future communication and environmental commitments that may be included in the ECP or TMP.

Thank you for providing EPA the opportunity to review the Purple Line Project FEIS. EPA looks forward to working with FTA and MTA as the project moves forward. If you have any questions regarding these comments, the staff contact for this project is Ms. Alaina McCurdy; she can be reached at 215-814-2741.

Sincerely,

Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

Attachments :

EPA.pdf (248 kb)



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

OCT 29 2013

Daniel Koenig
Federal Transit Administration
1990 K Street, NW, Suite 510
Washington, DC 20006-1178

Henry Kay
Maryland Transit Administration
100 South Charles Street
Tower 2, Suite 700
Baltimore, Maryland 21201

RE: Purple Line Final Environmental Impact Statement and Draft Section 4(f) Evaluation, Montgomery and Prince George's Counties, Maryland, August 2013, CEQ # 20130259

Dear Misers Koenig and Kay:

In accordance with Section 102(2) (C) of the National Environmental Policy Act (NEPA), 42 U.S.C. § 4332(2) (C), Section 309 of the Clean Air Act, 42 U.S.C. § 7609, and the Council on Environmental Quality (CEQ) regulations, 40 CFR Parts 1500-1508, the United States Environmental Protection Agency (EPA), has reviewed the Final Environmental Impact Statement (FEIS) for the above referenced project. The FEIS was prepared by Federal Transit Administration (FTA) and is dated December 2012. EPA reviewed the September 2008 Alternatives Analysis/ Draft EIS, and submitted a comment letter dated January 14, 2009. In this letter EPA rated the DEIS as "LO-1" (Lack of Objections-Adequate), according to the EPA rating system described on the website www.epa.gov/compliance/nepa/comments/ratings.html.

The FEIS analyzes two alternatives, including the no build alternative and the preferred alternative. The preferred alternative involves the construction and operation of a new light rail transit corridor over 16.2 miles from the Bethesda Metrorail station in Montgomery County to the New Carrollton Metrorail/MARC/Amtrak station in Prince George's County. Adverse environmental impacts to ecological resources resulting from the preferred alternative are relatively low. Stream impacts are approximately 5,507 linear feet, wetland impacts of 0.88 acres, forest impacts of approximately 48 acres, and 8.63 acres of park acquisition. EPA recognizes that updated and detailed analysis for many resources has been completed since the DEIS and that while several resource impacts have been decreased, some, including parks, have increased. Additional avoidance and minimization techniques should be incorporated where practicable, and appropriate mitigation developed, as the project moves forward.

EPA recognizes efforts made to evaluate and address community concerns and impacts, to coordinate this project with the community and resource agencies, and detail avoidance and minimization efforts as well as mitigation. EPA has appreciated efforts to present updated project information and developments at Interagency Review Meeting. EPA would be pleased to continue to be involved in the project as well as participate in more detailed development of wetland and stream compensatory mitigation. We appreciate efforts taken to improve and update the environmental justice analysis and the cumulative effects analysis for the FEIS using most recently available data.

The FEIS includes mitigation for long-term operational impacts as well as construction effects; however, there still remains a great deal of information that should be or is planned to be shared with the public, including information regarding noise, vibration, utility disruptions, and traffic and pedestrian movements. EPA suggests that FTA and Maryland Transit Administration (MTA) consider the best ways to share and communicate relevant information, which may not yet be available, with the public and local stakeholders after the Record of Decision (ROD) and during construction. EPA supports memorializing environmental and community commitments in order to ensure that the efforts and mitigation identified in the FEIS are carried forward during future phases. We understand that a Transportation Management Plan (TMP) and Environmental Compliance Plan (ECP) will be developed after the ROD and prior to the initiation of construction. Please find additional suggestions for your consideration regarding future communication and environmental commitments that may be included in the ECP or TMP.

Thank you for providing EPA the opportunity to review the Purple Line Project FEIS. EPA looks forward to working with FTA and MTA as the project moves forward. If you have any questions regarding these comments, the staff contact for this project is Ms. Alaina McCurdy; she can be reached at 215-814-2741.

Sincerely,



Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

Enclosure

Purple Line FEIS
Enclosure- Additional Environmental Commitments for Consideration

Air

- Consider whether an air quality and dust control specification could be put in place, which would outline necessary measures and requirements for contractors to follow in order to control on- and off-site nuisance dust. Consider implementing a dust control program.
- Consider whether a PM-10 or PM-2.5 monitoring program should be utilized.
- Use ultra-low sulfur diesel (ULSD) fuel in off-road construction equipment with an engine horsepower (HP) rating of 50 HP or above.
- Use diesel engine retrofit technology in off-road equipment to further reduce emissions. Such technology may include diesel oxidation catalyst/ diesel particulate filter (DOC/DPF), engine upgrades, engine replacements, or combinations of these strategies;
- Limit unnecessary idling times on diesel-powered engines to three minutes;
- Locate diesel-powered exhausts away from fresh air intakes
- Control dust related to the construction site through a Construction Environmental Protection Program (CEPP), including a Soil Erosion and Sediment Control Plan that includes, among other things, spraying of a suppressing agent (nonhazardous, biodegradable) on dust piles, containing fugitive dust, and adjusting construction activities to respond to meteorological conditions, as appropriate.

Noise and Vibration

- Where practicable, schedule individual project construction activities to avoid or minimize adverse impacts. Consider using noise barriers, including temporary barriers, semi-permanent barriers, noise curtains, and/or noise tents. Consider using vibration reducing techniques or mitigation measures. Consider how best to communicate the use of these techniques to the public.
- Coordinate construction activities with projects under construction in adjacent and nearby locations to avoid or minimize impacts.
- Consider condition of surrounding buildings, structures, infrastructure, and utilities, where appropriate. Consider whether pre-construction building inspections are warranted. Consider whether any special protection is needed for historic properties.
- Prepare contingency measures in the event established limits are exceeded. Consider steps to avoid generating noise/vibration from cumulative operations that may exceed noise limits.
- Consider establishing a public communication plan in order to keep the public informed and attempt to reduce public frustration. This plan could include regular public meetings, emails, a hotline, and other notices. The plan could also include expanded and clarified information on the construction impacts, operations and schedule.
- Consider whether a noise technician/acoustical engineer is needed during peak construction phases.
- Suggest restricting the use of certain types of equipment during noise/vibration-sensitive hours. Consider restricting night work all together. Consider sharing information specific to pile-driving and blasting operations and whether special notification procedures may be necessary.

- Consider whether temporary relocations of noise/vibration-sensitive receptors are an option or whether relocations are necessary.

Other

- We encourage that each of the commitments outlined in Section 4.20 be included in the ROD.
- Consider how to communicate final forest planting mitigation plans that will be coordinated with the Department of Natural Resources to the public.
- Be sure to communicate construction related and/or permanent park access and other property access changes with the public as more information becomes available closer to construction.
- Suggest providing additional, more detailed information to the public during construction regarding construction generated dust and congestion and associated effects on community resources, as limited information was available at the time of the FEIS.
- As more information becomes available through coordination with utility service providers, please consider the best way to share this information with the public who may be impacted by service disruptions. Suggest memorializing how residents will be notified of disruptions, and when notifications will be given. Consider what steps/actions may need to be taken in the event of an unexpected service outage.

Purple Line FEIS - RECORD #1041 DETAIL

Comment Date : 12/11/2013
First Name : Michael
Last Name : Weil
Business/Agency/Association Name : NCPC
State : MD
Email Address : michael.weil@ncpc.gov
Attachments : NCPC STAFF COMMENTS - FEIS.pdf (35 kb)

NCPC STAFF COMMENTS

PROJECT: MTA/FTA Purple Line FEIS (NCPC File No. 6884)

NCPC POINT OF CONTACT: Michael Weil (email: michael.weil@ncpc.gov, phone: 202.482.7253)

DATE: Oct. 30, 2013

Section	Page	Comment
4.6.1 Regulatory Context and Methodology - "U.S. Capper-Cramton Act of 1930"	4-49	In reference to " <i>NCPC has interpreted this Act to mean that any proposed development within the lands acquired with funding under the Capper-Cramton Act must be submitted to NCPC for review and to the M-NCPPC for review and approval.</i> " Suggested Revision: NCPC has interpreted this Act to mean that any proposed development within the lands acquired with funding under the Capper-Cramton Act must be submitted to NCPC for review and approval, in addition to the M-NCPPC review process.
	4-49	In reference to " <i>In compliance with the Capper-Cramton Act, the NCPC would review the analysis of the impacts of the project to these stream valley parks, and the M-NCPPC would approve the analysis based upon comments received from the NCPC.</i> " Suggested Revision: In compliance with the Capper-Cramton Act, the NCPC would fully analyze and approve all proposed project-related changes to the stream valley parks with guidance from federal, State, and M-NCPPC planning policies, and public comments acquired through the NEPA process.
	4-49	In reference to " <i>During their review of the AA/DEIS, the NCPC sent correspondence, dated January 16, 2009, informing FTA and MTA that it will consider the following factors when reviewing plans for development in these parks...</i> " Suggested Removal: " Approval of the alignment of the future extension of the Capital Crescent Trail. " NCPC would not have approval authority over any future Capital Crescent Trail improvements unless they require physical disturbance of Capper-Cramton acquired property. It appears from the preliminary construction plans (August, 2013) that this will not be the case.
4.6.2 Affected Environment	4-50	In reference to " <i>The five stream valley parks (Rock Creek, Sligo Creek, Northwest Branch, Paint Branch, and Anacostia River) are subject to NCPC review and M-NCPPC review and approval under the Capper-Cramton Act.</i> " Suggested Revision: The five stream valley parks (Rock Creek, Sligo Creek, Northwest Branch, Paint Branch, and Anacostia River) are subject to review and approval by both NCPC and M-NCPPC under the Capper-Cramton Act.
	4-50	In reference to " <i>The five stream valley parks (Rock Creek, Sligo Creek, Northwest Branch, Paint Branch, and Anacostia River) are subject to NCPC review and M-NCPPC review and approval under</i>

		<i>the Capper-Cramton Act.</i> ” Suggested Additional Text: However, based on the preliminary engineering plans (August, 2013) analyzed by the FEIS, the project’s “limit of disturbance” will only impact Capper-Cramton acquired property within the Sligo Creek, Northwest Branch, and Anacostia River Stream Valley Parks. Physical improvements within Rock Creek Park are fully contained within county-owned right-of-way, and proposed improvements near Paint Branch Stream Valley Park are fully contained within the Paint Branch Parkway right-of-way.
4.6.3 Preferred Alternative – Long-Term Operational Effects	4-51	In reference to “Approval of the alignment of the future extension of the Capital Crescent Trail...” Suggested Removal (listed item). While NCPC is always supportive of local/regional trail construction; promoting walking, recreation, and bicycling; and interested in the visual impacts of the proposed new bridges on Rock Creek Park as well as connecting the Rock Creek and Capital Crescent Trails, NCPC would not have approval authority over any future Capital Crescent Trail improvements unless they require physical disturbance of Capper-Cramton acquired property. It appears from the preliminary construction plans (August, 2013) that this will not be the case.
Table 4-18	4-57	In reference to “Rock Creek Stream Valley Park” item (row # 6). Suggested Revision: The park and trail were purchased and developed using Capper-Cramton Act and POS funding.
	4-57	In reference to “Sligo Creek Stream Valley Park” item (row # 10). Suggested Addition: The park was purchased and developed using Capper-Cramton funding.
	4-57	In reference to “Paint Branch Stream Valley Park” item (row # 17). Suggested Revision: The park was purchased using Capper-Cramton Act and POS Funds.
4.9.3 Long-Term Operational Effects – VAU 1	4-85	In reference to “ <i>The trail connection from the Capital Crescent Trail to the Rock Creek Trail would be a switchback path on the northeast side of the Preferred Alternative; while designated to minimize tree removal, it would nonetheless result in visual changes due to tree removal</i> ”. Additional Information Requested: Provide 1 or 2 photo simulations that show the area where the new switchback trail will be located (after construction) to show future visual conditions.
4.9.3 Long-Term Operational Effects – VAU 4	4-87	In reference to “ <i>In this residential area of high sensitivity the Preferred Alternative would have a high visual impact particularly to residents</i> ”. Additional Information Requested: Provide 1 or 2 photo simulations of the facility through Sligo Creek Park to illustrate its “high visual impact” to the area. One photo-simulation could show a view along Wayne Avenue (after construction), through the parkland, and the other could show the facility crossing through the park at a view perpendicular to the Sligo Creek Parkway.
4.13.3 Preferred Alternative - Mitigation	4-119	In reference to “ <i>Where forest impacts occur, MTA will comply with MDNR requirements for the final forest planting obligation.</i> ” Additional Information Requested: Please provide a little more

		information that summarizes the MDNR requirements in this section – including the tree replacement ratio/formula.
4.13.3 Preferred Alternative – Avoidance and Minimization	4-119	In reference to “ <i>The CRZ of specimen trees to be retained will be protected during construction through the installation of tree protection strategies as detailed in the FCP that will be prepared for the project.</i> ” Additional Information Requested: What are the current tree removal estimates for each park crossing (Rock Creek Park, Sligo Creek, NW Branch, Anacostia, B-W Parkway)? Using current preliminary plans, how many trees will need to be re-planted based on MDNR requirements (for each park crossing)?
4.14.1 Regulatory Context and Methodology	4-120, 121	Energy Independence and Security Act (EISA), Section 438. EISA, Section 438 contains federal stormwater runoff requirements for projects on federal property (B-W Parkway) with a footprint that exceeds 5,000 square feet. If applicable, please add this to the list of requirements and provide supporting information about project compliance where appropriate. For more information, please access the EPA’s technical memorandum on Section 438 at the following web address - http://water.epa.gov/polwaste/nps/upload/eisa-438.pdf
4.14.2 Affected Environment	4-122	In reference to “ <i>Several WQL segments have been identified by MDE within the project area, and the status and results of the TMDL process are summarized as follows: Sligo Creek, Northwest Branch ... - TMDLs approved for bacteria, sediment impairments, nutrients, trash, and polychlorinated biphenyls (PCBs).</i> ” Additional Information Requested: Please provide specific TMDL information (numeric and pollutant type) under existing conditions in a summary table for each of these streams from the Purple Line Water Resources Technical Report (2013).
4.14.3 Preferred Alternative	4-127	In reference to “ <i>While MTA has strived to avoid or minimize the water quality impacts, the project would increase impervious surfaces in the study area, which <u>could increase the amount of surface runoff and potentially increase the level of contaminants such as heavy metals, salt, organic molecules, and nutrients in the surface runoff.</u></i> ” Additional Information Requested: Please provide specific information (numeric) related to the potential contaminant increases for each of the stream crossings, within the LOD, from the Purple Line Water Resources Technical Report (2013).
	4-128	In reference to “ <i>To the extent that <u>TMDL thresholds pertain to typical contaminants</u> from impervious surfaces and transportation operations, the project stormwater BMPs designed in coordination with the MDE would minimize adverse impacts.</i> ” Additional Information Requested: Please describe the specific thresholds and contaminants that apply to each of the parkland crossings (in particular, Sligo Creek, NW Branch, Anacostia, Rock Creek Park), and provide examples of BMPs that could be used to minimize future potential adverse impacts. Also, please describe what is allowable by MDE standards related to future impacts from contaminant increases?

		Do all resulting increases have to be entirely mitigated or are there “acceptable” increase levels for each type of contaminant? Provide relevant information from the Purple Line Water Resources Technical Report (2013).
	4-128	In reference to “ <i>The relocation of a section of Sligo Creek north of Wayne Avenue would result in the greatest impact.</i> ” Additional Information Requested: Please describe the impact in more detail, reinforced by data from the Purple Line Water Resources Technical Report (2013).
<i>Short-Term Construction Effects – Waters of the U.S. and Wetlands</i>	4-129	Sligo Creek and Northeast Branch. Should these two streams be included in the Short-Term Construction Effects list? If so, please describe the project’s construction impacts to these streams, reinforced by data from the Purple Line Water Resources Technical Report (2013).
	4-130	In reference to “ <i>MTA will restore Sligo Creek approximately 180 feet upstream and 180 feet downstream of the project bridge to provide long-term benefits and enhance its inherent characteristics.</i> ” Additional Information Requested: Insert a photo simulation to illustrate the future condition of the stream once constriction is complete.
4.19.5 Preferred Alternative	4-156	In reference to “ <i>Both the Lyttonsville Yard and the Glenridge Maintenance Facility have been planned and designed in close coordination with neighborhood stakeholders and county officials to address community concerns and minimize adverse effects on residents.</i> ” Comment: Please continue to involve the Army (Forest Glen Annex) in planning for the Purple Line/Lyttonsville Maintenance Facility as those plans are further refined.
4.20 Commitments - Parks, Recreational Facilities, and Open Space (Section 4.6)	4-170	In reference to “ <i>Coordinate selective tree clearing and identification of significant or champion trees with agencies having jurisdiction</i> ”. Suggested Revision: Coordinate selective tree clearing, identification of significant or champion trees, and plan refinement with agencies having jurisdiction to minimize the project’s impact to visual and park resources, stormwater management, and water quality.
<i>Visual Resources (Section 4.9)</i>	4-171	Suggested Additional Bullet: MTA will continue to coordinate with M-NCPPC and NCPC in the stream valley parks that were funded through the Capper-Cramton Act as project plans are further refined.
<i>Habitat and Wildlife Section (Section 4.13)</i>	4-172, 173	Suggested Additional Bullet: MTA will continue to coordinate with M-NCPPC and NCPC in the stream valley parks that were funded through the Capper-Cramton Act as project plans are further refined.
<i>Water Resources (Section 4.14)</i>	4-173	Suggested Additional Bullet: MTA will continue to coordinate with M-NCPPC and NCPC in the stream valley parks that were funded through the Capper-Cramton Act as project plans are further refined.

4.22 Anticipated Permits and Approvals	4-176	In reference to Table 4-54. Additional Row Required: NCPC: Final approval of construction (minimum of 60-70% complete) and Environmental Compliance Plans for each of the affected “Capper-Cramton” stream valley parks. NCPC will be included in the coordination/review process for the Environmental Compliance Plans as they are developed to ensure project consistency with federal regional planning policies. Additionally, project plans for the alignment’s crossing under the Baltimore-Washington Parkway will be coordinated with NPS and NCPC as they are refined, and submitted for Commission action at a final (60-70%) level of detail.
6.4.1 Publicly Owned Parks and Recreational Areas – Rock Creek Stream Valley Park	6-30	In reference to “ <i>The FEIS Chapter 4.0 assessment of effects indicates that the Preferred Alternative would not cause noise, vibration, or visual effects on Rock Creek Stream Valley Park and Rock Creek National Recreational Trial.</i> ” Additional Information Requested: Provide 1 or 2 photo simulations (either in this section or Section 4.0) to show the switchback trail area (after construction) to help illustrate future visual conditions, since this area will likely experience the greatest tree removal. In addition, provide estimates for the proposed tree removal and new tree plantings (to mitigate the removal) in the park, as well as a comparison of specific stormwater management and water quality-related measures between pre-project and post-project conditions from the Purple Line Water Resources Technical Report (2013).
<i>Sligo Creek Stream Valley Park</i>	6-34	In reference to “ <i>While MTA intends to minimize tree removal during construction and implement selective clearing techniques, trees within the proposed work area would be impacted.</i> ” NCPC staff comment/recommendation: The meeting notes with M-NCPPC (in Appendix I) indicate that approximately 29 trees will be removed. Include this information within the text for easier reference.
	6-34	In reference to “ <i>Trees will be planted within Sligo Creek Stream Valley Park, where practical, to mitigate tree loss that occurs as a result of the proposed project.</i> ” Additional Information Requested / NCPC staff comment: Provide an estimate for how many trees will be planted to mitigate the tree removal, pursuant to applicable (State or County) requirements. The NCPC Comprehensive Plan includes a no net tree loss policy for projects within the National Capital Region. A photo simulation of the project area (looking towards the Wayne Avenue / Sligo Creek Parkway) once complete would help illustrate visual impacts. Lastly, provide a comparison of specific stormwater management and water quality-related measures between pre-project and post-project conditions from the Purple Line Water Resources Technical Report (2013).
<i>Northwest Branch Stream Valley Park</i>	6-48	In reference to “ <i>FTA is proposing a de minimis use determination for the Preferred Alternative at Northwest Branch Stream Valley Park.</i> ” Additional Information Requested / NCPC staff comment: Provide

		estimates for number of trees to be removed and new trees planted as mitigation. The NCPC Comprehensive Plan includes a no net tree loss policy for projects within the National Capital Region. Lastly, provide a comparison of specific stormwater management and water quality-related measures between pre-project and post-project conditions from the Purple Line Water Resources Technical Report (2013).
<i>Anacostia River Stream Valley Park</i>	6-51	In reference to “ <i>FTA is proposing a de minimis use determination for the Preferred Alternative at Anacostia River Stream Valley Park.</i> ” Additional Information Requested: Provide estimates for number of trees to be removed and new trees planted as mitigation, as well as a comparison of specific stormwater management and water quality-related measures between pre-project and post-project conditions from the Purple Line Water Resources Technical Report (2013).
<i>Baltimore-Washington Parkway</i>	6-54	In reference to “ <i>FTA is proposing a de minimis use determination for the Preferred Alternative at the Baltimore-Washington Parkway because of the mitigation measures proposed and the coordination undertaken with NPS to minimize harm</i> ” Additional Information Requested: Provide estimates for number of trees to be removed, new trees planted as mitigation, and a comparison of specific stormwater management and water quality-related measures between pre-project and post-project conditions from the Purple Line Water Resources Technical Report (2013). Also, provide one post-project photo simulation from a driver’s perspective along the B-W Parkway, approaching the re-constructed bridge over Riverdale Road.
<i>Rock Creek Park Montgomery County Survey Area</i>	6-65	In reference to “ <i>Tree removal would be required within the Montgomery County right-of-way for the construction of the proposed transitway and trail structures.</i> ” Suggestion: Reference earlier FEIS sections where more detailed estimates and photo simulations will be provided.
<i>Baltimore-Washington Parkway</i>	6-68	In reference to “ <i>By refining the transitway alignment along the south side of Riverdale Road, MTA would permanently use approximately 0.54 acres of land from the Baltimore-Washington Parkway.</i> ” Suggested Revision: Change “0.54” to “0.61” for consistency with information provided in the rest of the document.
	6-68, 69	Suggested Revisions: Change “6.61” to “6.72” (temporary occupancy area) and “0.54” to “0.61” (permanent use) throughout the remainder of the section (including Figure 6-42) for consistency.
<i>Sligo Creek Parkway</i>	6-70, 71	Suggested Revisions: Update <i>Temporary Occupancy</i> and <i>Permanent Park Use</i> figures on page 6-70 and in Figure 6-44 to make consistent with information provided earlier in the FEIS.
	6-70	In reference to “ <i>In addition, FTA, MTA, and the MHT are preparing a Section 106 Programmatic Agreement that outlines commitments and mitigation concerning the Sligo Creek Parkway.</i> ” Suggested Revision / NCPC staff comment: Please add “NCPC” to this sentence and contact us regarding this PA. To date, NCPC <u>has not been involved</u> with the Sligo Creek Parkway PA and with NCPC’s approval

		authority (with Section 106 responsibility) over any physical modifications to the park pursuant to the Capper-Cramton Act; staff should be included in the process as soon as possible.
	6-70	In reference to “FTA is proposing a no adverse effect determination regarding the Sligo Creek Parkway.” and “The proposed permanent and temporary uses by the Preferred Alternative would not adversely affect the features, attributes or activities – historic parkway – that qualify the Sligo Creek Parkway for Section 4(f) protection.” Additional Information Requested: As previously suggested, provide 1 or 2 photo simulations of the Wayne Avenue / Sligo Creek Parkway here to show the project after completion.
6.5.1 Park Agency Coordination	6-96	In reference to “The Baltimore-Washington Parkway is owned by the NPS, and as such, the NCPC has approval authority over this property as well.” Suggested Revision: The Baltimore-Washington Parkway is owned by the federal government, under the jurisdiction of the National Park Service. As federal property located within the National Capital Region, outside of the District of Columbia, the NCPC has advisory review authority over projects within the park.
	6-96	In reference to “NCPC’s formal review process consists of three steps:” Suggested Revision: NCPC’s formal process can consist of one, two, or three stages of Commission review, depending on the location and complexity of a project. Regarding the Purple Line, the Commission will likely review the project either as a two-stage (separate Preliminary and Final actions) or one-stage (combined Preliminary/Final action) review. NCPC’s future review timetable will depend on when detailed plans are available that adequately describe the project’s impacts/mitigation related to visual resources, water quality, stormwater management, and other environmental factors within the B-W Parkway and parklands acquired through Capper-Cramton funding.

Purple Line FEIS - RECORD #1043 DETAIL

Comment Date : 1/8/2014
First Name : Elder
Last Name : Ghigiarelli Jr.
Business/Agency/Association Name : MDE
Address : 1800 Washington Blvd
City : Baltimore
State : MD
Zip Code : 21230
Attachments : Purple Line FEIS Comments_MDE_10152013.pdf (101 kb)



MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Baltimore MD 21230

410-537-3000 • 1-800-633-6101

Martin O' Malley
Governor

Robert M. Summers, Ph.D.
Secretary

Anthony G. Brown
Lt. Governor

October 15, 2013

Mr. John Newton
Maryland Transit Administration
6 Saint Paul Street, Room 923
Baltimore, MD 21202

RE: Purple Line - Final Environmental Impact Statement & Draft Section 4(f) Evaluation

Dear Mr. Newton:

The Maryland Department of the Environment (MDE) has reviewed the Final Environmental Impact Statement (FEIS) & Draft Section 4(f) Evaluation. MDE notes that the additional jurisdictional resources verified by the U.S. Army Corps of Engineers and MDE during the July 30, 2013 Supplemental Jurisdictional Determination Field Review are not included in the August, 2013 FEIS. The additional jurisdictional resources should be included in the FEIS document. Regardless, please note that the supplemental resources must be included in the forthcoming Joint Permit Application submittal.

If you have any questions, please contact Ms. Emily Dolbin at (410) 662-7400 or by email at Emily.Dolbin@maryland.gov.

Sincerely,

Elder Ghigiarelli Jr.
Deputy Program Administrator
Wetlands and Waterways Program

cc: Maria Teresi, Corps of Engineers
Amanda Sigillito, Chief, Nontidal Wetlands Division
William Seiger, Chief, Waterway Construction Division
Emily Dolbin, MDE Consultant Reviewer