

BENNING ROAD & BRIDGES TRANSPORTATION IMPROVEMENTS

SECTION 106 TECHNICAL MEMORANDUM

FINAL SEPTEMBER 2020



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TABLE OF CONTENTS

1.0	INTRODUCTION	1
1.1	PROPOSED ACTION OVERVIEW	1
1.2	DESCRIPTION OF PROPOSED ACTION- AREA OF POTENTIAL EFFECTS.....	1
1.3	PURPOSE OF REPORT.....	2
1.4	SELECTION OF DDOT’S PREFERRED ALTERNATIVE	5
2.0	IDENTIFICATION OF HISTORIC PROPERTIES	5
2.1	METHODOLOGY	5
2.2	PREVIOUSLY IDENTIFIED HISTORIC PROPERTIES.....	6
2.2.1	<i>NRHP Multiple Property Listings</i>	13
2.3	POTENTIALLY ELIGIBLE HISTORIC PROPERTIES	13
2.4	POTENTIAL ARCHAEOLOGICAL RESOURCES	22
3.0	IMPACTS TO HISTORIC PROPERTIES AND ARCHAEOLOGICAL RESOURCES	26
3.1	METHODOLOGY	26
3.2	ASSESSMENT OF EFFECTS.....	27
3.2.1	<i>No-Build Alternative</i>	27
3.2.2	<i>Build Alternative 1 – Curbside Alignment</i>	28
3.2.3	<i>Preferred Alternative (Build Alternative 2 – Median Alignment)</i>	33
3.2.4	<i>TPSS</i>	39
3.2.5	<i>Propulsion System</i>	39
3.2.6	<i>DC Streetcar Car Barn Training Center</i>	39
3.3	TREATMENT OF HISTORIC PROPERTIES.....	41
4.0	CONCLUSIONS	41
5.0	REFERENCES.....	42
6.0	ATTACHMENT A.....	44

List of Figures

FIGURE 1: PROJECT APES FOR HISTORIC PROPERTIES AND ARCHAEOLOGY	4
FIGURE 2: PREVIOUSLY IDENTIFIED HISTORIC PROPERTIES	7
FIGURE 3: CIVIL WAR DEFENSES OF WASHINGTON - FORT MAHAN PARK	8
FIGURE 4: CIVIL WAR DEFENSES OF WASHINGTON – FORT CIRCLE PARK	9
FIGURE 5: LANGSTON GOLF COURSE	9
FIGURE 6: ANACOSTIA PARK, FOOTBRIDGES TO KINGMAN AND HERITAGE ISLANDS.....	10
FIGURE 7: KINGMAN ISLAND – BRIDGE TO HERITAGE ISLAND PARK	10
FIGURE 8: SPINGARN SCHOOL	11

FIGURE 9: BROWNE SCHOOL 11

FIGURE 10: YOUNG SCHOOL 12

FIGURE 11: KINGMAN PARK HISTORIC DISTRICT – 23RD PLACE 12

FIGURE 12: PROPERTIES ASSESSED FOR LISTING ELIGIBILITY ON THE NRHP 16

FIGURE 13: NRHP ELIGIBLE RESOURCES (GROUP I)..... 17

FIGURE 14: NRHP ELIGIBLE RESOURCES (GROUP II) 18

FIGURE 15: NRHP ELIGIBLE RESOURCES (GROUP III) 19

FIGURE 16: HISTORIC PROPERTIES AND NOISE MONITORING SITES..... 21

FIGURE 17: AREAS OF RECORDED DISTURBANCES IN THE APE 25

FIGURE 18: OKLAHOMA AVENUE TO KINGMAN ISLAND, BUILD ALTERNATIVE 1 (WIRED) 30

FIGURE 19: OKLAHOMA AVENUE TO KINGMAN ISLAND, BUILD ALTERNATIVE 1 (WIRELESS) 30

FIGURE 20: KINGMAN ISLAND TO 36TH STREET, BUILD ALTERNATIVE 1 (WIRED) 31

FIGURE 21: KINGMAN ISLAND TO 36TH STREET, BUILD ALTERNATIVE 1 (WIRELESS) 31

FIGURE 22: MINNESOTA AVENUE TO 45TH STREET, BUILD ALTERNATIVE 1 (WIRED)..... 32

FIGURE 23: MINNESOTA AVENUE TO 45TH STREET, BUILD ALTERNATIVE 1 (WIRELESS)..... 32

FIGURE 24: UNION STATION STOP ON H STREET 33

FIGURE 25: OKLAHOMA AVENUE TO KINGMAN ISLAND, BUILD ALTERNATIVE 2 (WIRED) 35

FIGURE 26: OKLAHOMA AVENUE TO KINGMAN ISLAND, BUILD ALTERNATIVE 2 (WIRELESS) 36

FIGURE 27: KINGMAN ISLAND TO 36TH STREET, BUILD ALTERNATIVE 2 (WIRED) 36

FIGURE 28: KINGMAN ISLAND TO 36TH STREET, BUILD ALTERNATIVE 2 (WIRELESS) 37

FIGURE 29: MINNESOTA AVENUE TO 45TH STREET, BUILD ALTERNATIVE 2 (WIRED)..... 37

FIGURE 30: MINNESOTA AVENUE TO 45TH STREET, BUILD ALTERNATIVE 2 (WIRELESS) 37

FIGURE 31: MEDIAN PLATFORM AT 42ND STREET - EASTWARD VIEW, BUILD ALTERNATIVE 2 (WIRED)..... 38

FIGURE 32: MEDIAN PLATFORM AT 42ND STREET - WESTWARD VIEW, BUILD ALTERNATIVE 2 (WIRED)..... 38

FIGURE 33: POTENTIAL TPSS LOCATIONS..... 40

List of Tables

TABLE 1: PREVIOUSLY IDENTIFIED HISTORIC RESOURCES 8

TABLE 2: MULTIPLE PROPERTY DOCUMENTATION FORMS..... 13

TABLE 3: PROPERTIES IN THE APE REQUIRING DETERMINATION OF ELIGIBILITY EVALUATION 13

TABLE 4: NOISE RECEPTORS FOR HISTORIC PROPERTIES 20

TABLE 5: RECORDED ARCHAEOLOGICAL SITES WITHIN A QUARTER-MILE OF THE APE 23

1.0 Introduction

1.1 Proposed Action Overview

The District Department of Transportation (DDOT), in conjunction with the Federal Highway Administration (FHWA), prepared this Section 106 evaluation to support Final Environmental Assessment (EA) for the proposed Benning Road and Bridges Transportation Improvements project (the proposed action) in northeast Washington, DC. The proposed action would: provide safety improvements; extend the H/Benning Streetcar service to the Benning Road Metrorail Station; and improve pedestrian and bicycle facilities along Benning Road between Oklahoma Avenue and the Benning Road Metrorail Station. FHWA is the lead federal agency for the EA, with DDOT (the Applicant) as the local sponsor. The Federal Transit Administration (FTA), the National Capital Planning Commission (NCPC), and the National Park Service (NPS) are cooperating agencies.

The proposed action qualifies as an eligible project for Federal-aid funding under 23 CFR § 810.102 Eligible projects . FHWA concurred with mass transit use of the Benning Road ROW in a letter to DDOT dated April 18, 2013. The proposed action is included in the National Capital Region Transportation Planning Board’s adopted Transportation Improvement Program (TIP) and the 2016 Financially Constrained Long-Range Plan for the National Capital Region (CLRP). This EA is a Federal document and was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations (40 CFR 1500-1508), FHWA’s Environmental Impact and Related Procedures (23 CFR 771), FHWA’s Technical Advisory Guidance for Preparing and Processing Environmental and Section 4(f) Documents (T6640.8A), FHWA’s 2006 SAFETEA-LU Environmental Review Process: Final Guidance, Appendix A of 23 CFR part 450 titled Linking Transportation Planning and NEPA Processes, FTA’s 2006 Transit Noise and Vibration Impact Assessment guidance, FHWA’s Noise Regulations (23 CFR 772), and DDOT’s Environmental Process Manual.

As the proposed action uses federal aid funds, the National Historic Preservation Act (NHPA) is applicable. This Section 106 Technical Memorandum supports the EA and was prepared to document the historic properties and archaeological resources in the Benning Road corridor and to document the assessment of effects of the proposed action on these properties or resources. These assessments are consistent with Section 106 of the National Historic Preservation Act (16 U.S.C. §470) and its implementing regulations (36 CFR 800).

1.2 Description of Proposed Action- Area of Potential Effects

The portion of Benning Road that is the subject of the EA is the northeast section of Washington, DC and is approximately two miles long. The western terminus for the proposed action is the intersection of Benning Road and Oklahoma Avenue. The eastern terminus is the Benning Road Metrorail Station. Areas of potential effect (APE) were identified for the purposes of this Section

106 Technical Memorandum using the methodology described in Section 2. The APEs are shown in **Figure 1**. The APE for historic properties primarily includes residential areas with retail and business activity around the intersection of Benning Road and Minnesota Avenue. The APE for historic properties also includes portions of Langston Golf Course and Fort Mahan Park. Within each APE, Benning Road crosses the Anacostia River, Kingman and Heritage Islands Park, DC-295, and the Metrorail and CSX Railroad tracks.

Benning Road is a principal arterial that carries an annual average daily traffic (AADT) of 26,000. It carries four lanes of traffic in each direction between Oklahoma Avenue and 36th Street, and two through lanes of traffic in each direction between 26th Street and the Benning Road Metrorail Station. The Benning Road APEs are adjacent to and just east of the H/Benning Streetcar Line. The APE for historic properties includes two Metrorail stations: Benning Road and Minnesota Avenue. The intersection of Benning Road and Minnesota Avenue has a high volume of pedestrian and motor vehicle activity. This intersection provides safety challenges and has been continually listed as one of the top five intersections that record both high crash rates and crash frequency within the District. The Traffic Accident Reporting and Analysis System 2 shows that the intersection of Benning Road and Minnesota Avenue recorded 202 crashes from 2016 to 2018, with 60 of those crashes resulting in injuries.

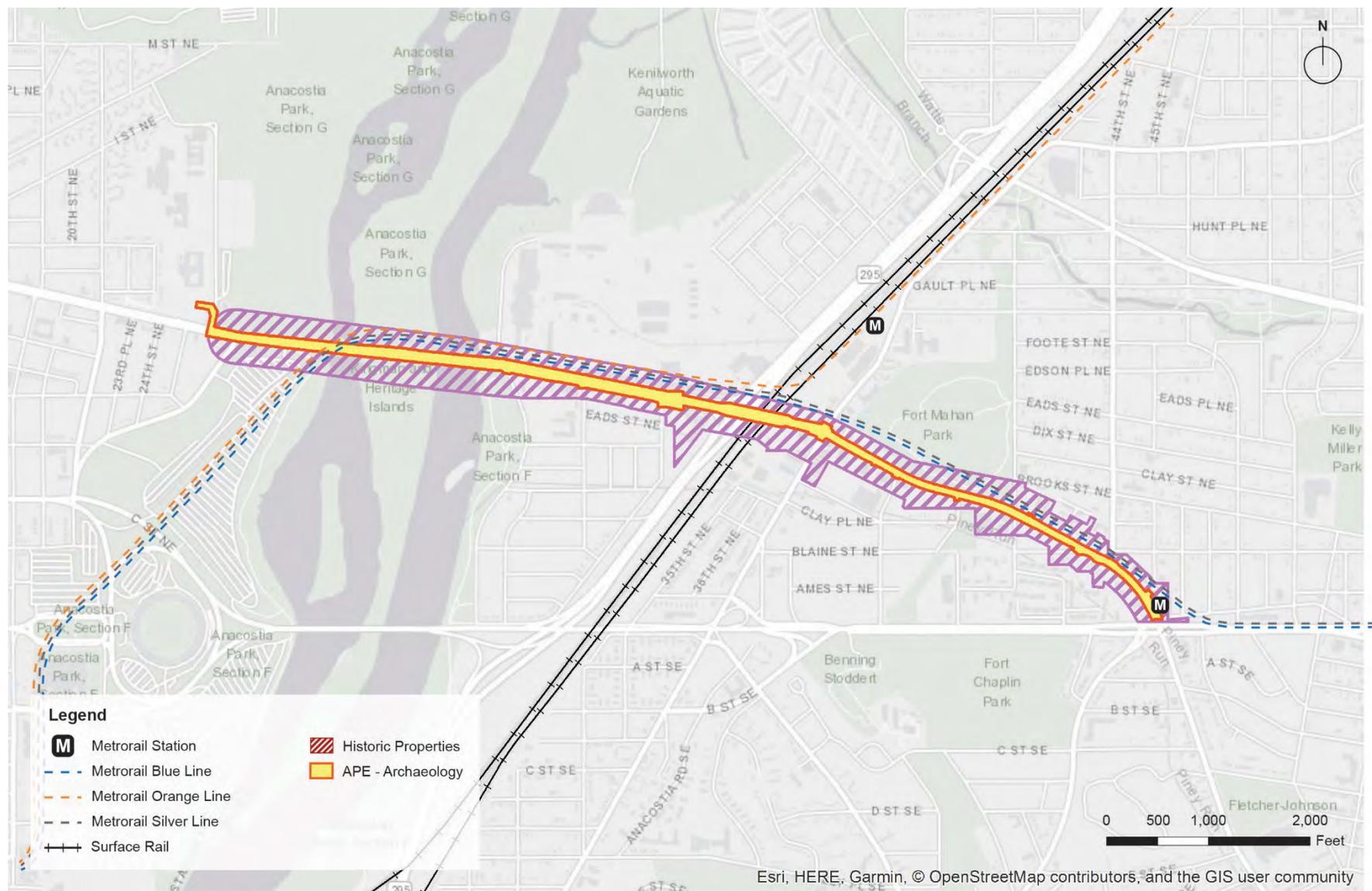
The two bridges crossing DC-295 and CSX Railroad tracks in the APEs provide both structural and functional challenges. These bridges need repair or rehabilitation, and lack adequate sidewalks. Existing transit services along Benning Road are well-used and crowded. This portion of Benning Road has been part of several studies and plans in the past including the DC Transit Future System Plan (2010), Benning Road Streetcar Extension Feasibility Study (2013) and Benning Road Corridor Redevelopment Framework Plan (2008). The need to improve the Benning Road corridor to safely and efficiently accommodate all modes of transportation is a recurring theme in previous planning studies. The purpose of the proposed action is to address deficiencies in transportation infrastructure conditions, improve safety conditions and operations for both motorized and non-motorized access, and to provide for increased mobility and accessibility between the intersection of Benning Road and Oklahoma Avenue and the Benning Road Metrorail Station.

1.3 Purpose of Report

The purpose of this report is to provide an evaluation of historic properties and archaeological resources in the APEs under Section 106 of the National Historic Preservation Act (NHPA) of 1966. DDOT informally initiated Section 106 consultation with the District of Columbia State Historic Preservation Office (DC SHPO) in March 2014 and the FHWA formally initiated consultation in March of 2015 (**Appendix A**). During the period of initial consultation between DDOT and the DC SHPO, the project team established APEs (see **Figure 1**) and the properties that required evaluation for their eligibility for inclusion in the National Register of Historic Places (NRHP) were identified. During consultation between DDOT and DC SHPO, it was agreed that 29 properties in the APE for historic properties required a determination of NRHP eligibility.

Additionally, it was acknowledged that six properties in the APE have previously been listed in or have been determined eligible for listing in the NRHP.

Figure 1: Project APes for Historic Properties and Archaeology



Regarding archaeological resources, preliminary research resulted in the identification of previously recorded archaeological sites within a quarter-mile of the APE. The two build alternatives were determined occurring primarily within the previously disturbed land of DDOT's right-of-way. As a result, FHWA, DDOT and the DC SHPO previously agreed to defer an archaeological survey until the proposed locations and dimensions of project-related ground disturbances are refined. With the continued coordination and selection of Preferred Alternative, it was determined that no new ground disturbance would be needed as a part of the proposed project. Therefore, no adverse impacts to the archeological resources are anticipated. FHWA and DDOT will continue to consult with DC SHPO throughout the final design and construction of the proposed project.

1.4 Selection of DDOT's Preferred Alternative

The Draft EA was released for a 30-day public comment period on May 4, 2016 and a public hearing was held on May 19, 2016. The public and agencies were given the opportunity to review and comment on the EA until June 2, 2016. Public and agency coordination efforts have continued since the Draft EA and public hearing. DDOT held an Open House for the EA on November 15, 2017. After thorough consideration of input received from the public and agencies after publication of the Draft EA and based on technical analyses and the evaluation of alternatives, DDOT has selected Build Alternative 2-Median Streetcar Alignment with wired propulsion as the Preferred Alternative.

2.0 Identification of Historic Properties

2.1 Methodology

Under 36 CFR 800.16(d), APEs for historic properties and for archaeology were defined for each Build Alternative in 2014. An APE is "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist." Development of the APEs took into consideration the potential for effects from construction and operational activities related to the proposed action. The APE for archaeological resources was defined as the proposed action limits of disturbance (LOD) under the current conceptual design; the APE for historic properties includes the archaeological APE as well as areas within visible and/or audible range of the LOD. The DC SHPO concurred on the APEs in 2014. The APEs may be modified in the future to accommodate additional impact areas (such as construction lay-down areas) not defined in the current design.

Historic properties and archaeological sites within the APEs were identified according to two criteria:

- Current listing on the NRHP, and properties previously determined eligible for listing in the NRHP; and
- Meeting the criteria for listing in NRHP but not previously listed or determined eligible.

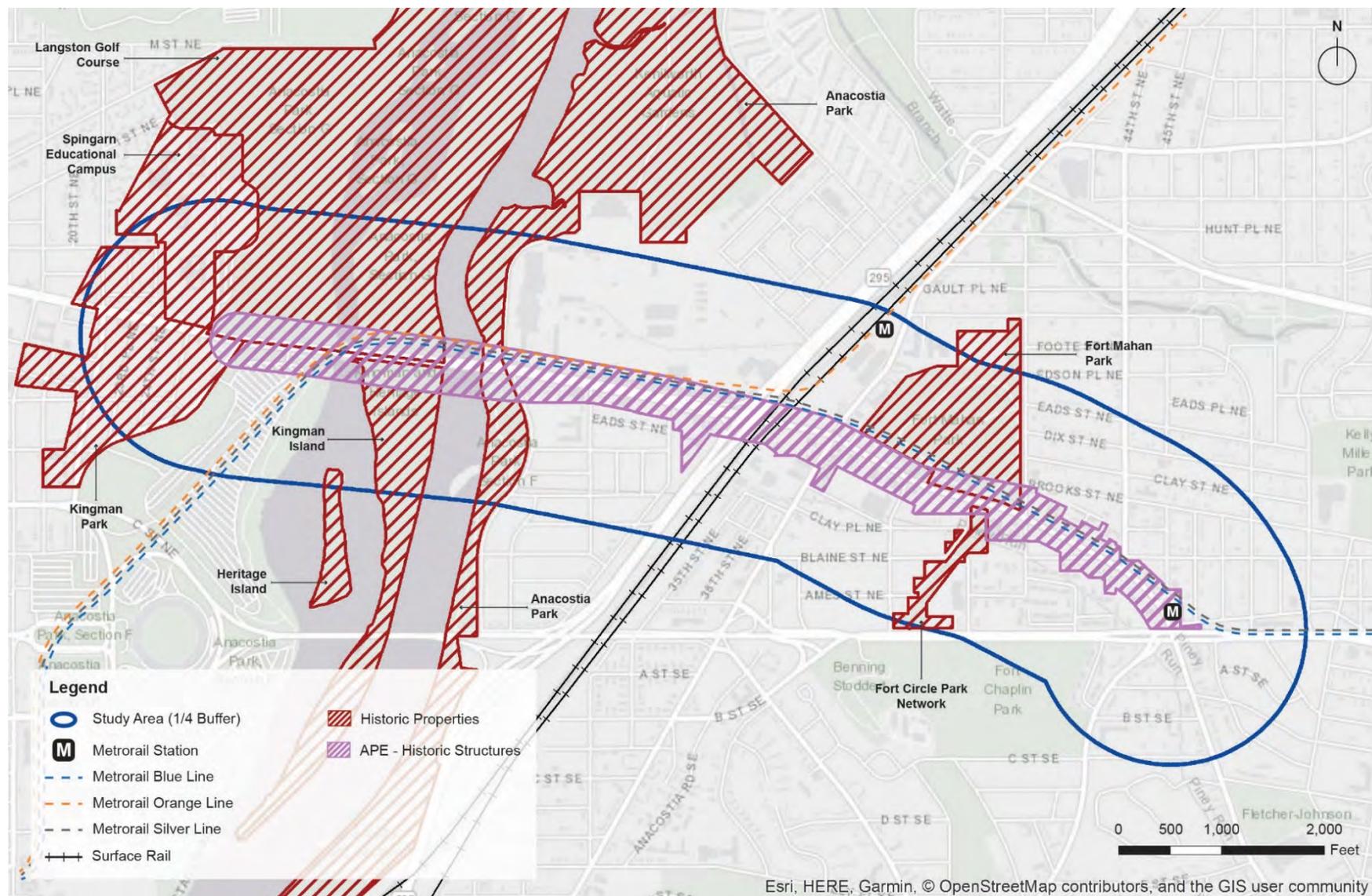
Properties listed in the District of Columbia Inventory of Historic Sites (DCIHS) are considered to meet NRHP eligibility criteria and, thus, are historic properties. Research and an historic properties survey were conducted in the APE to identify historic properties; research only was completed for archaeological sites. The background research effort consisted of internet research of local newspaper articles, library research at Kiplinger Research Library of the Historical Society of Washington, DC, and the Washingtonian collection at the Martin Luther King, Jr. Library, analysis of historic maps and aerial photographs, nominations for sites listed in the NRHP and DCIHS, the DC Office of Planning online mapping of historic sites, and previous studies in the proposed action vicinity.

The historic property survey was conducted between August and October 2014. The purpose of the survey was to collect enough data and photographs to evaluate the historical integrity of each of the 29 properties identified in consultation with the DC SHPO as requiring determinations of NRHP eligibility. The historic properties survey was completed in accordance with federal and local laws and regulations, including Section 106 of the NHPA by professional architectural historians meeting the Secretary of Interior's standards (36 CFR 61). Information gathered during the background research and field survey was used to prepare a DC SHPO Determination of Eligibility Form for each property.

2.2 Previously Identified Historic Properties

Seven previously identified historic properties are within the APE. Two NPS parks are listed in the NRHP: Civil War Defenses of Washington (Fort Mahan and Fort Circle Parks) and the Langston Golf Course Historic District. NPS and DC SHPO consider Anacostia Park (which includes Kingman and Heritage Islands Park) to be eligible for listing in the NRHP and the DCIHS. The Browne, Phelps, Spingarn, and Young Educational Campus Historic District at 2500 Benning Road is listed in the NRHP and DCIHS; the Spingarn Senior High School is also individually listed. In 2018, Kingman Park became the area's newest NRHP-listed historic district. Its boundary includes the Langston Golf Course and the Browne, Phelps, Spingarn, and Young Educational Campus Historic District. The entrance pavilion and marquee of the former Senator Theater on Minnesota Avenue, south of Benning Road is listed in the DCIHS. The auditorium itself, however, has been demolished. These properties are summarized in **Table 1** below and shown in **Figure 2**. **Figure 3** through **Figure 11** illustrate these properties.

Figure 2: Previously Identified Historic Properties



Sources: DC SHPO; DC Inventory of Historic Sites and Pending Historic Landmark and Historic District Nominations; National Capital Parks – East, Environmental Assessment.

Table 1: Previously Identified Historic Resources

Property Name	Designation	Status	NRHP#
Civil War Defenses of Washington	NRHP	Listed	74000274
Langston Golf Course Historic District	NRHP	Listed	19911015
Anacostia Park	NRHP DCIHS	Eligible Listed	n/a
Senator Theater Entrance Pavilion	DCIHS	Listed	n/a
Spingarn School	NRHP DCIHS	Listed Listed	14000198
Browne, Phelps, Spingarn, and Young Educational Campus Historic District	NRHP DCIHS	Listed Listed	15000743
Apartment Buildings of Washington DC 1870-1945	NRHP	Listed	64500083
Kingman Park Historic District	NRHP DCIHS	Listed Listed	100002960

Sources: District of Columbia, Historic Preservation Office; DC Inventory of Historic Sites and Pending Historic Landmark and Historic District Nominations; National Capital Parks – East, Environmental Assessment, Anacostia Riverwalk Trail Section 3 Realignment, Anacostia Park; National Park Service, National Register of Historic Places Database and Research Page.

Figure 3: Civil War Defenses of Washington - Fort Mahan Park



Figure 4: Civil War Defenses of Washington – Fort Circle Park



Figure 5: Langston Golf Course



Figure 6: Anacostia Park, footbridges to Kingman and Heritage Islands



Figure 7: Kingman Island – Bridge to Heritage Island Park



Source: www.kingmanisland.org

Figure 8: Spingarn School



Figure 9: Browne School



Figure 10: Young School



Figure 11: Kingman Park Historic District – 23rd Place



Sources: *Kingman Park Historic District Design Guidelines*, DC Historic Preservation Board

2.2.1 NRHP Multiple Property Listings

NRHP Multiple Property Listings record groups of thematically related properties that are historically significant. This type of NRHP listing defines and describes one or more historic contexts, associated property types related to the historic context(s) and establishes significance and integrity requirements for nominating properties to the National Register. This type of NRHP listing is established through a Multiple Property Documentation Form (MPDF). Apartment buildings within the APE, may meet the criteria for the previously approved “Apartment Buildings of Washington DC 1870-1945” MPDF.

Table 2: Multiple Property Documentation Forms

Resource Name	Designation	Status	NRHP#
Apartment Buildings of Washington DC 1870-1945	NRHP	Listed	64500083

Source: National Park Service, National Register of Historic Places Database and Research Page, <http://www.nps.gov/nr/research/>.

2.3 Potentially Eligible Historic Properties

In letters dated March 25, 2014 and August 20, 2014, the DC SHPO identified an additional 29 properties in the APE that warrant a determination of eligibility evaluation for listing on the NRHP (see **Figure 12**). Recommendations of NRHP eligibility of these properties have been formulated. The DC SHPO concurred with these recommendations on April 15, 2015 (Appendix A). Overall, 11 of the 29 properties were determined to be eligible for listing on the NRHP. Photographs of the eleven resources are provided in **Figure 13** through **Figure 15**.

Table 3: Properties in the APE Requiring Determination of Eligibility Evaluation

Ref. No.	Address	Description	Recommended NRHP Status
1	Benning Road	Fire and Police Call Boxes	Eligible
2	3300 Benning Road	Pepco Power Plant, 1906 (most of plant demolished, this structure remains standing)	Eligible
3	3341 Benning Road	1948 commercial building obscured by large c. 1990 addition	Not Eligible
4	3399 Benning Road	Mid-20 th -century auto sales and service building, now D&C Cab	Not Eligible
5	3423-39 Benning Road	River Terrace Shopping Complex, c. 1940, designed by George T. Santmyers. Not individually eligible but contributes to a potential River Terrace Historic District.	Not Eligible
6	3445 Benning Road	19 th -century house, now “Benning Liquors;” substantially altered	Not Eligible
7	Vicinity of 3700 Benning Road	Baltimore & Potomac Railroad	Eligible

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Appendix F – Section 106 Technical Memorandum

Ref. No.	Address	Description	Recommended NRHP Status
8	Vicinity of 3700 Benning Road	Baltimore & Ohio Railroad, Alexandria Branch	Not Eligible
9	3701 Benning Road	A. Loffler Provision Co., 1916. Adjacent to the principal slaughterhouse and livestock facility for DC.	Not Eligible
10	3938 Benning Road	1931 residence designed by African-American Architect Lewis Giles	Eligible
11	3940 Benning Road	1940 Colonial Revival residence designed by African-American Architect Gus Bull	Not Eligible
12	4001 Benning Road	Stewart Funeral Home, 1964. Designed by Donald H. Roberts for an African-American family-owned and operated business founded in 1900.	Eligible
13	4053 Benning Road	c. 1930 residence	Not Eligible
14	4145 Benning Road	No. 14 Police Precinct, 1948; Metropolitan Police Department Sixth District Headquarters, 1978 extension	Not Eligible
15	4201-4243 Benning Road	Block of row houses, c. 1940	Eligible
16	4202 Benning Road	Commercial building, now Mike's Market	Not Eligible
17	4208 Benning Road	Designed by African-American architect Cyril Bow in 1939. Eligible under "Apartment Buildings in Washington D.C. 1880-1945" MPDF	Eligible
18	4228 Benning Road	1945-46 apartment building designed by African-American Architect R. C. Archer	Eligible
19	4234 Benning Road	c. 1930 residence	Not Eligible
20	4236 Benning Road	1941 apartment building designed by African-American Architect Cyril Bow. Eligible under "Apartment Buildings in Washington D.C. 1880-1945" MPDF	Eligible
21	4248 Benning Road	Commercial building, now Jamahri's Hair Studio	Not Eligible
22	4254 Benning Road	c. 1930 residence	Not Eligible
23	4256-4264 Benning Road	c. 1950 apartment buildings	Not Eligible
24	4270 Benning Road	Jones Memorial Methodist Episcopal Church, now New Mount Calvary Baptist Church, designed by Woodson & Vaughn, built in 1923	Eligible
25	4274 Benning Road	1942 apartment building designed by George T. Santmyers. Eligible under "Apartment Buildings in Washington D.C. 1880-1945" MPDF	Eligible
26	4212 East Capitol Street	Fort Chaplin Park Apartments & Townhomes	Not Eligible
27	4510 East Capitol Street	The "Shrimp Boat," take-out restaurant, constructed c. 1953	Not Eligible

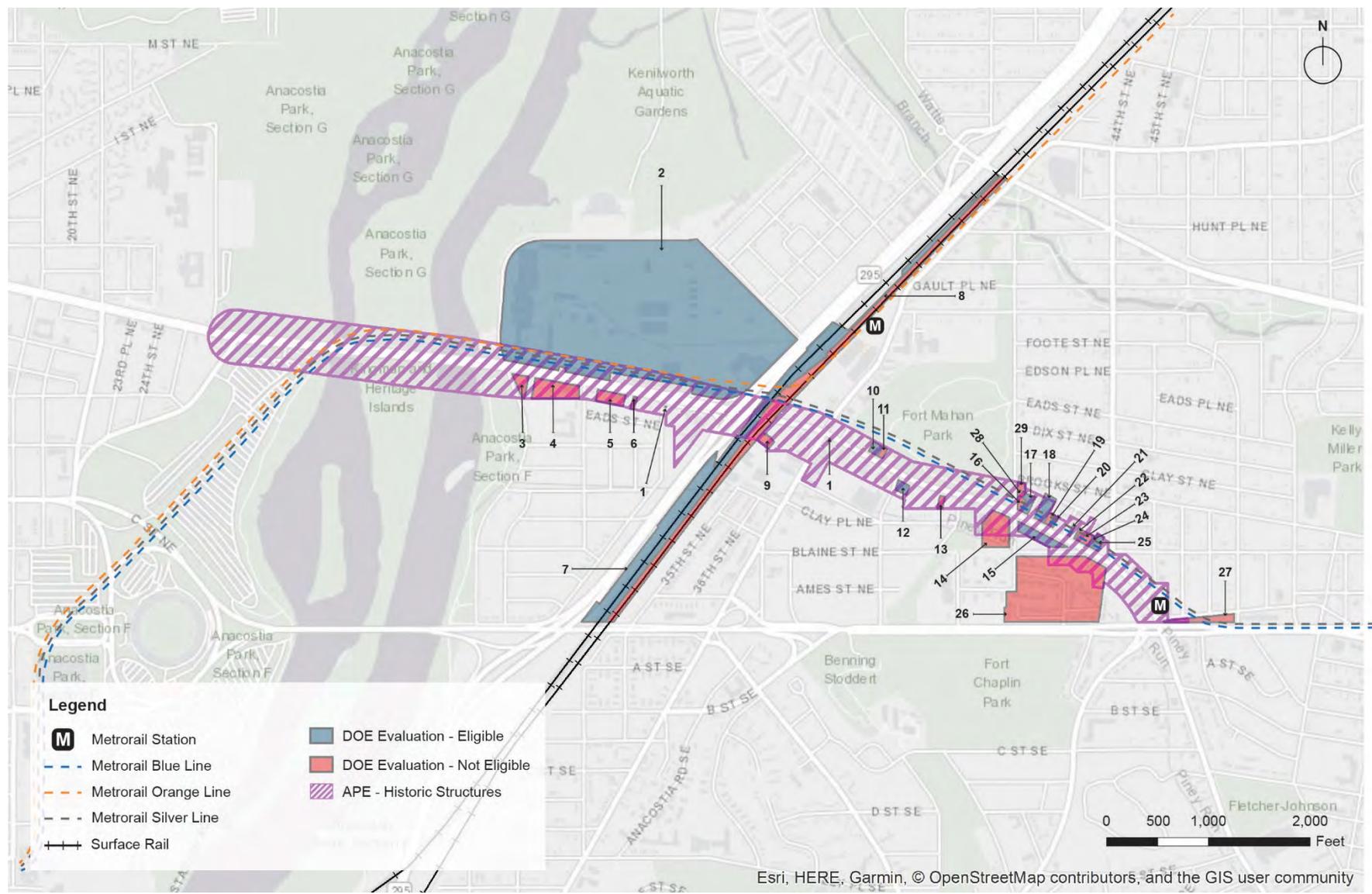
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Appendix F – Section 106 Technical Memorandum

Ref. No.	Address	Description	Recommended NRHP Status
28	217-223 42 nd Street	Mid-20 th -century duplexes	Not Eligible
29	227 and 231 42 nd Street	Mid-20 th -century apartments, currently a pre-school	Not Eligible

Sources: DC SHPO

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Figure 12: Properties Assessed for Listing Eligibility on the NRHP



Sources: DCGIS

Figure 13: NRHP Eligible Resources (Group I)



Figure Key

A. Fire and Police
Call Boxes

B. PEPCO Power
Plant

C. Baltimore &
Potomac Railroad

D. 3938 Benning Rd

Figure 14: NRHP Eligible Resources (Group II)



Figure Key

- E. Stewart Funeral Home (4001 Benning Rd)
- F. 4208 Benning Rd
- G. Row House Block, 4201-4243 Benning Rd
- H. 4228 Benning Road

Figure 15: NRHP Eligible Resources (Group III)



Figure Key

I. 4236 Benning Rd

J. New Mount
Calvary Baptist
Church (4270
Benning Rd)

K. 4228 Benning
Road

The noise analysis conducted for this project describes the current and future noise conditions predicted to exist at seven of the eight previous listed historic properties, as well as at eight of the 11 properties determined to be eligible for listing in the NRHP. The Senator Theater Entrance is the NRHP listed property that was not included in the analysis. The property was excluded from the analysis based on its distance from Benning Road. The three NRHP eligible properties that were not include in the analysis are: the Fire and Police Call Boxes; the Pepco facility at 3300 Benning Rd; and the section of the Baltimore & Potomac Railroad located in the vicinity of 3700 Benning Road. The call boxes and Railroad were excluded because they are elements of transportation facilities that are themselves sources of noise and therefore considered non-noise sensitive. The Pepco facility was excluded because it is an industrial site that is itself a source of noise and therefore considered non-noise sensitive. **Figure 16** illustrates the placement of the 14 noise receptors used in the noise analysis, and **Table 4** identifies the receptors used to assess each property.

Table 4: Noise Receptors for Historic Properties

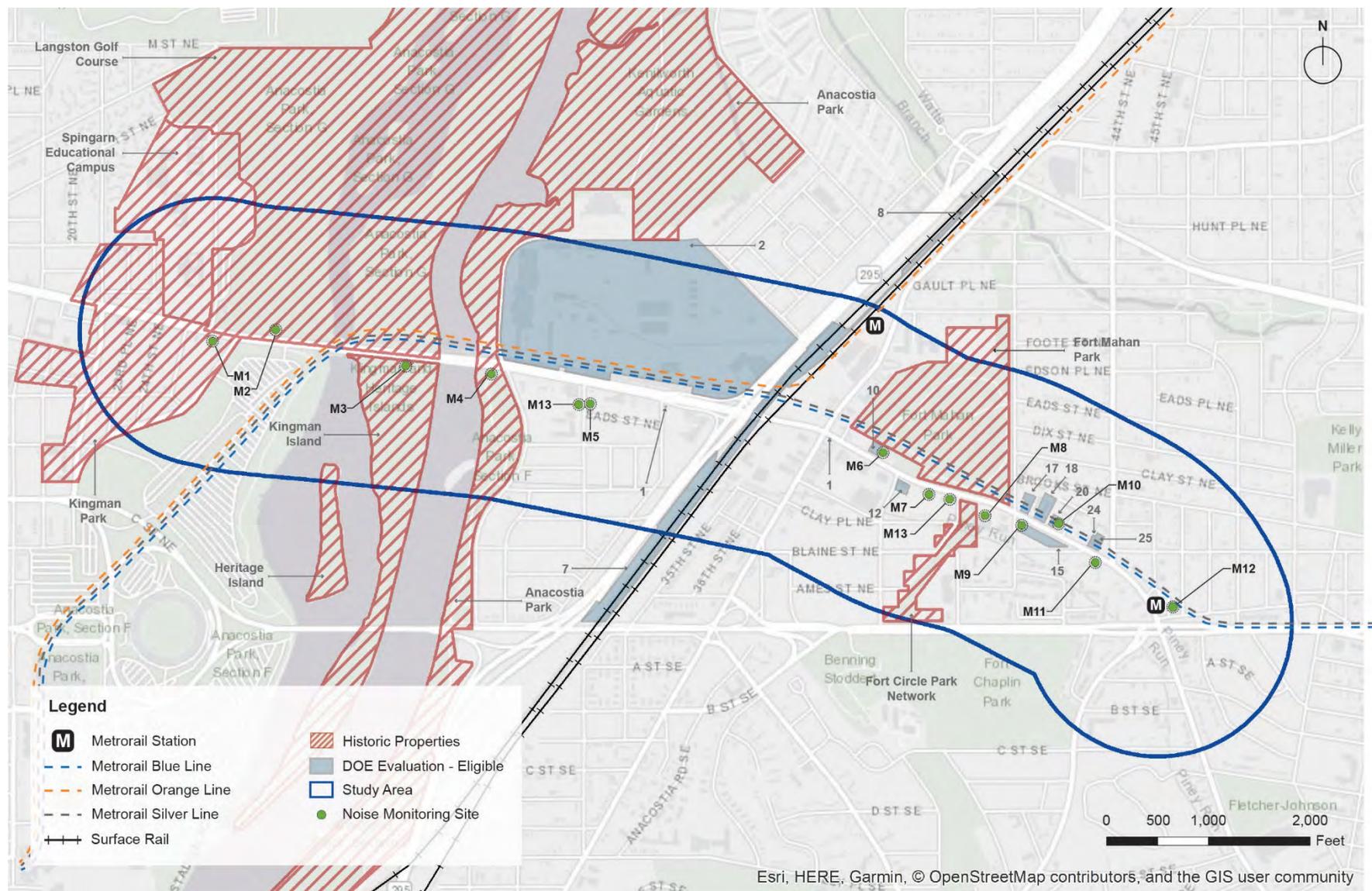
Ref No.	Name / Address	Representative Noise Receptor	FHWA Activity Category	FTA Land Use Category
-	Civil War Defenses of Washington (Fort Mahan)	M6	C	3
-	Civil War Defenses of Washington (Fort Circle)	M8	C	3
-	Langston Golf Course Historic District	M2	C	3
-	Anacostia Park	M4	C	3
-	Senator Theater Entrance Pavilion ¹	-	D	3
-	Spingarn School	M1	C	3
-	Browne, Phelps, Spingarn, and Young Educational Campus Historic District	M1	C	3
-	Kingman Park Historic District	M1	B	2
1	Fire and Police Call Boxes, Benning Road ²	-	F ³	-
2	3300 Benning Road ³	-	F ³	-
7	Vicinity of 3700 Benning Road ³	-	F ³	-
10	3938 Benning Road	M6	B	2
12	4001 Benning Road	M7	C	3
15	4201-4243 Benning Road	M9	B	2
17	4208 Benning Road	M9	B	2
18	4228 Benning Road	M10	B	2
20	4236 Benning Road	M10	B	2
24	4270 Benning Road	M11	C	3
25	4274 Benning Road	M11	B	2

¹ This property was excluded from the analysis of noise impacts due to its setback from Benning Road

² These properties were excluded from the analysis because they are considered to be non-noise sensitive

³ Category F properties are considered not to be noise sensitive, and therefore are not eligible for abatement consideration

Figure 16: Historic Properties and Noise Monitoring Sites



2.4 Potential Archaeological Resources

The Anacostia River floodplain and adjacent upland bluffs were favorable for human occupation throughout the prehistoric, contact, and historic periods. Given the topographic setting of the APE and historic activities carried out in the vicinity, the area of the APE would have had high prehistoric and historic archaeological potential prior to the extensive landfilling of the turn of the 20th century.

Numerous archaeological surveys have been conducted within a quarter-mile of the APE, several which intersect or are immediately adjacent to the APE. Those surveys, as well as professional and/or avocational archaeologists canvassing the area since the late nineteenth century, have reported thirteen archaeological sites within a quarter-mile of the APE (**Table 5**). Four of the 13 sites are reported to be present within or adjacent to the APE but given the imprecision of site recordation over the past 100+ years, their presence within the APE requires archaeological confirmation. The results of the preliminary assessment of the potential for archaeological resources in the APE are summarized as follows:

- The western portion of the APE around Anacostia Park, includes Kingman Island and Heritage Island. This area appears to be the least disturbed portion of the APE. However, historic documents indicate that the area around the Anacostia River was substantially modified by an early-twentieth-century program of dredging, channelization, wetland-reclamation, and island-building that created both islands and Kingman Lake. Archaeological materials predating the early-twentieth century may be present at these locations beneath a package of historic fill material of variable but sometimes substantial thickness (re. Wagner 2015).
- Within the existing right-of-way of the Benning Road and Minnesota Avenue, no intact archaeological deposits are anticipated because the area has been subject to decades of utility, roadway and transit infrastructure construction and maintenance activities that have disturbed surface and subsoils (e.g. installation and resurfacing). The most disruptive and well-documented impact to naturally occurring land surfaces within the APE for archaeology resulted from construction of WMATA's Blue Line in the mid-1970s. As shown in **Figure 17**, the alignment of the Blue Line encompasses the APE for archaeology from a point west of 42nd Street to the eastern end of the APE. The subway was constructed using the cut-and-cover method. Consequently, no intact archaeological deposits are expected to occur in this section of the APE.
- Fort Mahan area — There is a potential for intact archaeological resources dating to the late-nineteenth through early-twentieth-centuries or earlier in the Fort Mahan Park area. Areas adjacent to Fort Mahan Park, a Civil-War era fort, were constructed for the defense of Washington, DC and listed in the NRHP as part of the Civil War Defenses of Washington District. Fort Mahan Park itself is protected by the NPS and the area surrounding the park is heavily disturbed due to roadway, residential and business developments. Therefore, no intact archaeological deposits are expected to occur in this section of the APE.

Table 5: Recorded Archaeological Sites within a Quarter-Mile of the APE

Site #	Location	Report #	Site Name	Project	Site Type	NRHP Status	Time Period
51NE008	East Bank of Anacostia River above Benning Bridge	203	BP15		P	Not evaluated	2 paleo points; Unidentified (UID) prehistoric
51NE009*	River Terrace Playground, BP 16. NW of school	581	River Terrace; BP16	River Terrace School Expansion	P	Eligible under D	Late Archaic, Early and Middle Woodland
51NE010	East of Anacostia River; between Anacostia Avenue & 34 th Street, Star Blaine	203	BP17		HP	Not evaluated	UID prehistoric; Contact; Not relocated.
51NE013*	East bank of Anacostia River; South of Benning Bridge				P	Not evaluated	UID prehistoric. Not relocated.
51NE015*	East of Anacostia River; South of Benning Bridge		S34; S47; S33		P	Not evaluated	Woodland and UID prehistoric; Not relocated.
51NE018	South of Benning Road, 300 yds from Pepco Power House		S341		P	Not evaluated	Early, Middle, Late Woodland, and UID prehistoric; Not relocated.
51NE023	1100 ft northwest of Benning Road/ Kenilworth Avenue intersection Pepco Railroad spurs	203	PE 242-312	WSSC Force Main	P	Not evaluated	UID prehistoric. Not relocated.
51NE025	Intersection of Kenilworth Avenue and Benning Road	150		Barney, Circle Phase I & II	P	Not eligible	UID prehistoric
51NE036	Sq. 5053, portion lot 38, Minnesota Avenue adjacent to Metro Station	274	DC DOES	Phase 1 DC DOES	HP	Not eligible. Destroyed by construction	UID prehistoric and domestic/ farm/ church/ school

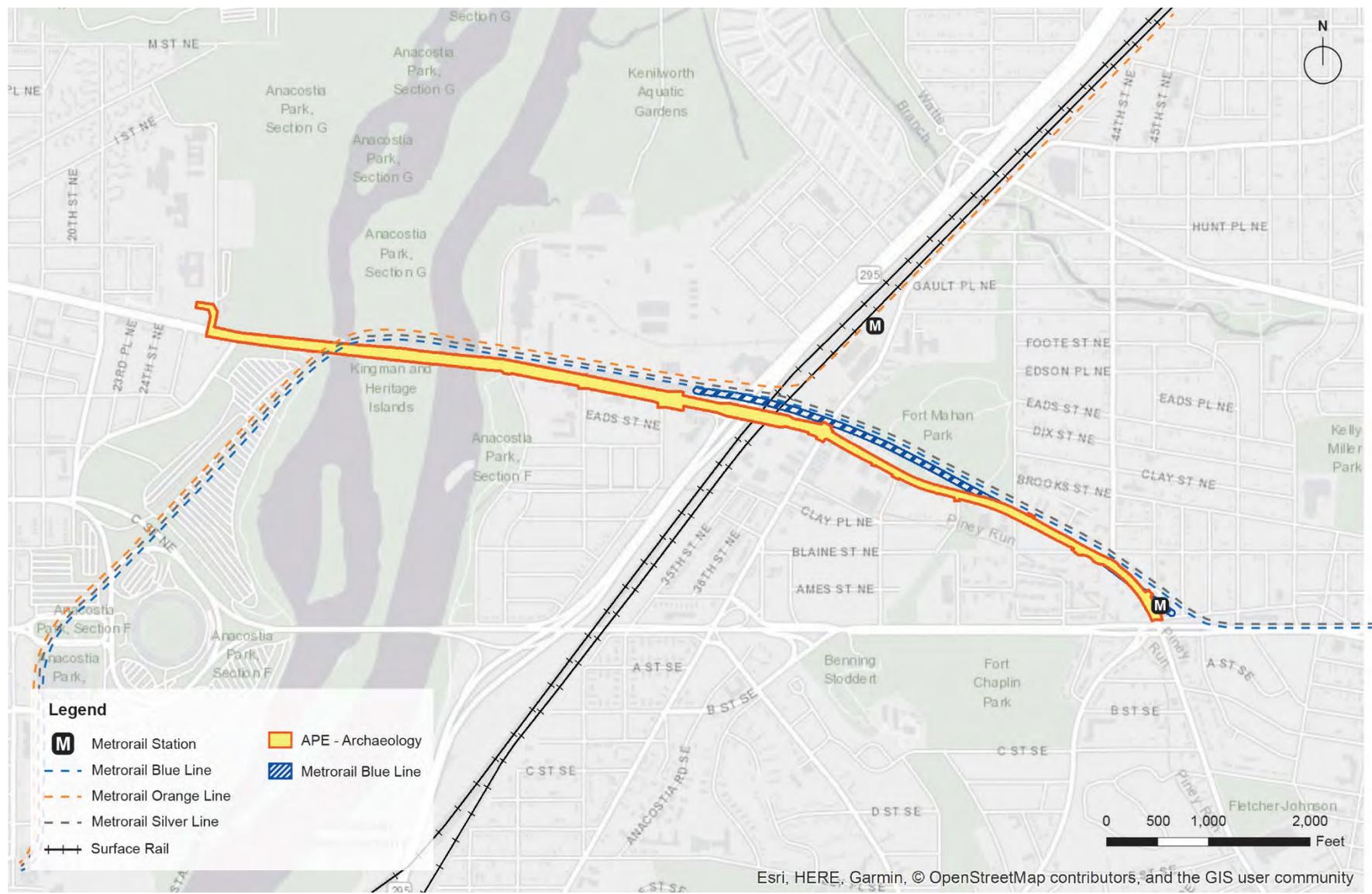
Benning Road and Bridges Transportation Improvements Final Environmental Assessment:
Appendix F – Section 106 Technical Memorandum

Site #	Location	Report #	Site Name	Project	Site Type	NRHP Status	Time Period
GWU5	Prehistoric secondary deposit in fill, no site # given	203	GWU5	WSSC Force Maine	P	Not a site	Secondary deposit of prehistoric (mixed age) in fill
H101*	In the vicinity of Benning Road and Anacostia Avenue		Benning's Bridge Battery		Civil War	Not relocated	
P29	SI 243 Cat 155082 Scagg Far; originally lumped with 51NE17	203	Scagg Farm	PRAS	P	Not relocated, unevaluated	Woodland; UID prehistoric ceramics
51NE050*	4000 Benning Road	627		HUD – Multi-Family Housing	H	Not eligible	Early 20 th century industrial

Source: DCHPO 2016.

*Reported within or adjacent to the APE.

Figure 17: Areas of Recorded Disturbances in the APE



3.0 Impacts to Historic Properties and Archaeological Resources

3.1 Methodology

Impacts to historic properties and archaeological resources are described in terms of type, context, duration, and intensity, which is consistent with CEQ regulations that implement NEPA. These impact analyses are intended, however, to comply with the requirements of both NEPA and Section 106 of the National Historic Preservation Act (NHPA) of 1966. In accordance with the Advisory Council on Historic Preservation (ACHP) regulations implementing Section 106 (36 CFR Part 800, Protection of Historic Properties), impacts to historic properties and archaeological resources were identified and evaluated by:

- Determining the APE;
- Identifying historic properties and archaeological resources present in the APE that are either listed in or eligible to be listed in the NRHP;
- Applying the criteria of adverse effect to affected historic properties and archaeological resources either listed in or eligible to be listed in the NRHP; and
- Considering ways to avoid, minimize, or mitigate adverse effects.

Under the ACHP's regulations, a determination of either adverse effect or no adverse effect must be made for affected NRHP listed or eligible historic properties and archaeological resources. An adverse effect occurs whenever an impact alters, directly or indirectly, any characteristic of a historic properties and archaeological resources that qualifies it for inclusion in the NRHP (e.g., diminishing the integrity of the resource's location, design, setting, materials, workmanship, feeling, or association). Adverse effects also include reasonably foreseeable effects caused by a proposed action that would occur later in time, be farther removed in distance, or be cumulative (36 CFR 800.5, Assessment of Adverse Effects). Adverse effects on historic properties and archaeological resources would include, but not be limited to:

- Physical destruction, damage, or alteration of all or part of the property;
- Isolation of the property from or alteration of the character of the property's setting when that character contributes to the property's qualification for the NRHP;
- Introduction of visual, audible, or atmospheric elements that are out of character with the property or alter its setting;
- Neglect of a property resulting in its deterioration or destruction; and
- Transfer, lease, or sale of the property (36 CFR 800.9[b]).

A determination of no adverse effect means that historic properties and archaeological resources are present, but the effect would not diminish in any way the characteristics of the property or resource that qualify it for inclusion in the NRHP.

For the purposes of this *Section 106 Technical Memorandum*, a significant impact under NEPA is defined as an “unresolvable” adverse effect under Section 106 of the NHPA. “Unresolvable” adverse effects may occur when the terms of mitigation cannot be agreed upon, or if the NHPA Section 106 process is foreclosed due to an inability to reach agreement.

The effects of the proposed action on historic properties and archaeological resources in the APE are described below. As stated above, an adverse effect on a property or resource would result if the proposed action impacts the integrity or character of that property or resource. The activities that cause impacts on historic properties and archaeological resources are typically associated with the construction of a proposed action, including: disturbance of the ground, the material or physical alteration of the built environment, or the alteration of the visual setting. Construction activities may cause impacts on historic properties and archaeological resources and can include excavation, staging, heavy equipment usage and movement, drilling, demolition, or relocation, as well as increases in noise or vibration levels, or introduction of new visual elements.

Common adverse effects or changes to a historic property are visual intrusions, construction and operational noise and vibration. A change in the visual setting of an historic property through the introduction of new features to the landscape or removal of existing ones, can impact the significance of that property. Vibration from impact pile-driving during construction could cause the physical destruction, damage, or alteration of an historic property if the pile-driving is within 25 to 50 feet of the property. Construction noise also has the potential to cause adverse effects or substantial adverse change to an historic property. An historic property that is sensitive to noise includes such properties as residences, parks, libraries, museums, and schools. These types of properties have an inherent quiet nature that is part of their identification as well as their significance.

Soil excavation or compaction resulting from the use of heavy machinery on the construction site or in staging areas may affect the integrity of artifact-bearing deposits associated with known or as-yet undiscovered archaeological resources. Unrecorded archaeological resources may exist in portions of the APE for archaeology. Disturbance and removal of archaeological resources could result in effects on archaeological resources under Section 106.

An Architectural Historian qualified under the Secretary of the Interior’s Professional Qualification Standards (36 CFR part 61) conducted the assessment of the potential of the proposed action elements to affect historic properties within the APE. An Archaeologist performed the same assessment for archaeological resources.

3.2 Assessment of Effects

3.2.1 No-Build Alternative

Under the No Build Alternative, existing conditions would remain unchanged. Historic properties and archaeological resources would not be affected as no excavation, demolition, or construction would occur on or near the properties or resources.

3.2.2 Build Alternative 1 – Curbside Alignment

Safety improvements at the intersection of Benning Road and Minnesota Avenue would require relocation of an historic fire call box in the southeast corner of the intersection because of minor widening to accommodate a left-turning lane. Build Alternative 1 would not impact the historic fire and call boxes at the Benning Road and 36th Street intersection. DDOT will relocate the Minnesota Avenue fire call box to a comparable position at the new roadway edge in the southeast corner. As the proposed relocation would not diminish the integrity of the fire call box or its setting, a preliminary determination of no adverse effect to the fire call box is made.

The proposed improvements on Benning Road between Oklahoma Avenue and the western bank of the Anacostia River, occur within the boundaries of the Kingman Park Historic District. In the District's NCHRP nomination form, Benning Road is discussed several times as an important feature of Kingman Park's development. The existence of streetcar service along Benning Road (and mobility itself) is a key component of this relationship. By reintroducing streetcar service along the corridor, Build Alternative 1's proposed roadway improvements within the boundaries of the Kingman Park Historic District are therefore considered to be consistent with the District's historical context.

The proposed action would modify the Benning Road typical section, which would introduce new visual elements to the study area (new roadway typical section, streetcar operations, stop platforms, wired propulsion, traction powered substations (TPSS) and DC Streetcar Car Barn Training Center connecting track). Build Alternative 1 would also require removal of the street trees along Benning Road to accommodate the proposed roadway typical section. A key element in that change is the wider roadway section adjacent to historic properties aligned along Benning Road. A second key element is the new streetcar operation along Benning Road (track, stops, and vehicles); the third key element is the propulsion system for that streetcar (wired and wireless options). Each element would be located on or near the outside lane areas of the roadway section. **Figure 18** through **Figure 23** are renderings of Build Alternative 1 showing the wired and wireless propulsion systems. **Figure 24** shows the existing stop platform design at Union Station; DDOT would apply a similar design and elements at the proposed stops. The assessment of potential effect of Build Alternative 1 on historic properties determined that none would be adversely affected. While each element would be a new visual element in the context of the historic properties, the new elements are not inconsistent with the existing and historic transportation – focused visual elements in the APE.

Specifically, Benning Road pre-dates the historic properties, apart from the fort component of Fort Mahan Park (an archaeological resource). Historic properties, such as the apartment and commercial buildings, are oriented to the roadway. A streetcar historically ran along the portion of Benning Road in the APE from the west side of the Anacostia River to Kenilworth Avenue. The presence of this line was a positive selling point for the developers of River Terrace and provided mass transit access to the Benning Road area and north to the Deanwood neighborhood. Introduction of a new streetcar service would be consistent with the historical presence of streetcar transit in the APE. The focus of activities at other historic properties, such as the Langston Golf

Course, Anacostia Park, and the Civil War Defenses of Washington, are internal to the properties. The elements of the proposed action would be peripheral to these focal points.

The development of Build Alternative 1 would require the acquisition of temporary easements from Kingman and Heritage Island Park, Anacostia Park, the Baltimore & Potomac Railroad, the Pepco powerplant. These temporary easements would be needed to install temporary fencing, erosion and sediment control measures, and provide adequate space for construction activities. In the B&P Railroad corridor, the easements will extend approximately 30 feet from the perimeter of the Whitlock Bridge. The principal construction activity in this area will be demolition and reconstruction of the Whitlock Bridge. In Anacostia Park, Kingman Park, and the Pepco powerplant, the easements will extend approximately 5 feet south from the existing edge of sidewalk. The principal construction activity in these areas will be sidewalk reconstruction. Based on the long and extensive of ground disturbance in these areas, no intact archaeological deposits are expected to occur in these sections of the APE.

Based on the scope of the proposed improvements, Build Alternative 1 warrants the consideration of noise impacts under both FHWA and FTA's noise analysis protocols. The results of the both analyses are provided in **Appendix I**, the *Noise and Vibration Technical Memorandum* that was completed for the EA. Using FHWA's criteria, all 15 of the historic properties included in the noise analysis are predicted to experience traffic noise levels above the NAC under both the existing and build conditions and therefore are considered be impacted under DDOT's Noise Policy. However, the traffic noise levels predicted to occur under the build condition for all 15 properties are within one decibel of those currently experienced. Based on this conclusion, the changes in traffic noise volumes generated by the proposed improvements will not be discernable and therefore do not constitute an adverse effect under Section 106 of the Historic Preservation Act.

Using FTA's criteria, five historic properties are predicted to be impacted by the noise generated by streetcar operations. Three of the five properties are expected to experience severe noise impacts under the build condition; these three properties are: Spingarn High School, Kingman Park Historic District, and Browne, Phelps, Spingarn, and Young Educational Campus Historic District. These impacts are associated with: use of the streetcar warning bell; the use of switches; and the occurrence of wheel squeal. These impacts will be mitigated using several noise reduction measures. Detailed specifications for these measures will be defined during final design, and include:

- Installing "spring frogs," pointless switches, flange-lifters, and similar fixtures which eliminate the gap in the rail and thereby the impulsive or impact noise from the steel wheel striking the rail gap;
- Increasing the radius of the track curves, applying flange lubricators to "grease" the contact points between the steel wheels and the steel rail heads, or procuring streetcar vehicles that can operate effectively along tracks with radii less than 100 feet without causing wheel squeal to occur; and
- Reducing the intensity of the streetcar warning bell (as safety protocols allow).

The two remaining properties are expected to experience moderate noise impacts under the build condition. The two impacted properties are the apartment building located at 4208 Benning Road

and the block of rowhouses located between 4201 and 4243 Benning Road. These impacts are associated with the use of the streetcar warning bell. These impacts will be mitigated by reducing the intensity of the streetcar warning bell and shifting the 42nd Street stop to the west side of the intersection. From a cumulative perspective, the noise from future streetcar operations represents only two percent of the noise that will be generated on Benning Road under the build condition. As a result, the overall noise impact is expected to be approximately the same as loudest hour noise levels predicted using FHWA’s Traffic Noise Model (TNM). As stated previously, the build condition noise levels predicted by TNM are within one decibel of existing noise levels and therefore do not constitute an adverse effect under Section 106 of the Historic Preservation Act.

Figure 18: Oklahoma Avenue to Kingman Island, Build Alternative 1 (wired)



Figure 19: Oklahoma Avenue to Kingman Island, Build Alternative 1 (wireless)



Figure 20: Kingman Island to 36th Street, Build Alternative 1 (wired)



Figure 21: Kingman Island to 36th Street, Build Alternative 1 (wireless)



Figure 22: Minnesota Avenue to 45th Street, Build Alternative 1 (wired).



Figure 23: Minnesota Avenue to 45th Street, Build Alternative 1 (wireless).



Figure 24: Union Station Stop on H Street



Vibration levels from streetcar operations along Benning Road in Build Alternative 1 would exceed FTA vibration impact thresholds at three historic properties (4201-4243 Benning Road, 4208 Benning Road and 4274 Benning Road) that are adjacent to Benning Road because of the proximity of the resources to Benning Road. DDOT will implement vibration control measures (such as streetcar speed reductions and ballast mats under the tracks) to reduce or eliminate vibration impacts. Because of this commitment, vibration from streetcar operations in Build Alternative 1 would not alter the vibration setting of the historic properties in the APE to the degree that the properties would no longer be eligible for the NRHP. DDOT has determined that in terms of vibration impacts, Build Alternative 1 would have no adverse effect on each historic property.

3.2.3 Preferred Alternative (Build Alternative 2 – Median Alignment)

As with Build Alternative 1, the proposed safety improvements for the Benning Road and Minnesota Avenue intersection would require the relocation of the fire call box at the southeast corner of the intersection to a new, similar location. As the call box would retain its integrity of location and setting, the preliminary determination of no adverse effect to the property will occur. The development of Build Alternative 2 would introduce the same visual elements as Build 1 and would lead to similar loss of street trees. Build Alternative 2 proposes to locate the proposed streetcar components (track, stops and propulsion system) towards the roadway median. Specifically, each set of components are closer to the center of Benning Road, and therefore farther away from adjacent historic properties, in Build Alternative 2 compared with Build Alternative 1.

Figure 25 through **Figure 30** are renderings of Build Alternative 2 showing the wired and wireless propulsion systems, respectively. As noted in **Section 1.4**, DDOT has selected the wired option as part of its Preferred Alternative. The proposed roadway dimensions would be the same as Build Alternative 1. **Figure 31** and **Figure 32** are renderings of the proposed stop platform design with an integral wall, shelter, and bench. The stop configuration illustrated in these renderings is located to the west of the Benning Road – 42nd Street intersection and was developed to reduce the occurrence of streetcar noise experienced at the rowhouse block located between 4201-4243 Benning Road. As the elements in Build Alternative 2 would be like those in Build Alternative 1, but located farther inside the roadway section, the preliminary determination of direct and visual effects was determined to have no adverse effect on the APE's historic structures and districts.

The development of Build Alternative 2 would require temporary easements from Kingman and Heritage Island Park, Anacostia Park, the Baltimore & Potomac Railroad, and the Pepco powerplant. These temporary easements would be needed to install temporary fencing, erosion and sediment control measures, and provide adequate space for construction activities. In the B&P Railroad corridor, the easements will extend approximately 30 feet from the perimeter of the Whitlock Bridge. Figures depicting the extent of the easements are provided in **Appendix B** of Benning Road and Bridges Transportation Improvements Environmental Assessment. The principal construction activity in this area will be the replacement of the Whitlock Bridge. In Anacostia Park, Kingman Park, and the Pepco Powerplant, the easements will extend approximately 5 feet south from the existing edge of sidewalk. The principal construction activity in these areas will be sidewalk reconstruction. Based on the long and extensive ground disturbance in these areas, no intact archaeological deposits are expected to occur in these sections of the APE.

Based on the scope of the proposed improvements, Build Alternative 2 warrants the consideration of noise impacts under both FHWA and FTA's noise analysis protocols. Both analyses are provided in detail in **Sect I** of Benning Road and Bridges Transportation Improvements Environmental Assessment. Using FHWA's criteria, all 15 of the historic properties included in the noise analysis are predicted to experience traffic noise levels above the NAC under both the existing and build conditions and therefore are considered to be impacted under DDOT's Noise Policy. However, the traffic noise levels predicted to occur under the build condition for all 15 properties are within one decibel of those currently experienced. Based on this conclusion, the changes in traffic noise volumes generated by the proposed improvements will not be discernable in the Benning Road corridor and therefore; do not constitute an adverse effect under Section 106 of the Historic Preservation Act.

Using FTA's criteria, five historic properties are predicted to be impacted by the noise generated by streetcar operations. Three of the five properties are expected to experience severe noise impacts under the build condition: Spingarn High School, Kingman Park Historic District, and Browne, Phelps, Spingarn, and Young Educational Campus Historic District. The proposed impacts are associated with: use of the streetcar warning bell; the use of track switches; and the occurrence of wheel squeal. These impacts will be mitigated using several noise reduction measures, including:

- Installing “spring frogs,” pointless switches, flange-lifters, and similar fixtures which eliminate the gap in the rail and thereby the impulsive or impact noise from the steel wheel striking the rail gap;
- Increasing the radius of the track curves, applying flange lubricators to “grease” the contact points between the steel wheels and the steel rail heads, or procuring streetcar vehicles that can operate effectively along tracks with radii less than 100 feet without causing wheel squeal to occur; and
- Reducing the intensity of the streetcar warning bell (as safety protocols allow).

The two remaining properties are expected to experience moderate noise impacts under the build condition; these two properties are the apartment building located at 4208 Benning Road and the block of rowhouses located between 4201 and 4243 Benning Road. These impacts are associated with the use of the streetcar warning bell. These impacts will be mitigated by reducing the intensity of the streetcar warning bell and shifting the 42nd Street stop to the west side of the intersection. From a cumulative perspective, the noise from future streetcar operations represents only two percent of the noise that will be generated on Benning Road under the build condition. As a result, the overall noise impact is expected to be approximately the same as loudest hour noise levels predicted using FHWA’s Traffic Noise Model (TNM). As stated previously, the build condition noise levels predicted by TNM are within one decibel of existing noise levels within the Benning Road corridor and are therefore; not anticipated to constitute an adverse effect under Section 106 of the Historic Preservation Act.

Figure 25: Oklahoma Avenue to Kingman Island, Build Alternative 2 (wired)



Figure 26: Oklahoma Avenue to Kingman Island, Build Alternative 2 (wireless)



Figure 27: Kingman Island to 36th Street, Build Alternative 2 (wired)



Figure 28: Kingman Island to 36th Street, Build Alternative 2 (wireless)



Figure 29: Minnesota Avenue to 45th Street, Build Alternative 2 (wired)



Figure 30: Minnesota Avenue to 45th Street, Build Alternative 2 (wireless)



Figure 31: Median Platform at 42nd Street - Eastward View, Build Alternative 2 (wired)



Figure 32: Median Platform at 42nd Street - Westward View, Build Alternative 2 (wired)



3.2.4 TPSS

TPSS – Wired and wireless propulsion would be supported by TPSS facilities that supply electricity at intervals along an electrically powered transit system. The TPSS facility sites are shown in **Figure 33** and would be located on land that is not part of an historic property and would not be adjacent to or near an historic property. The TPSS facilities are preliminarily determined to have no adverse effect on historic properties.

3.2.5 Propulsion System

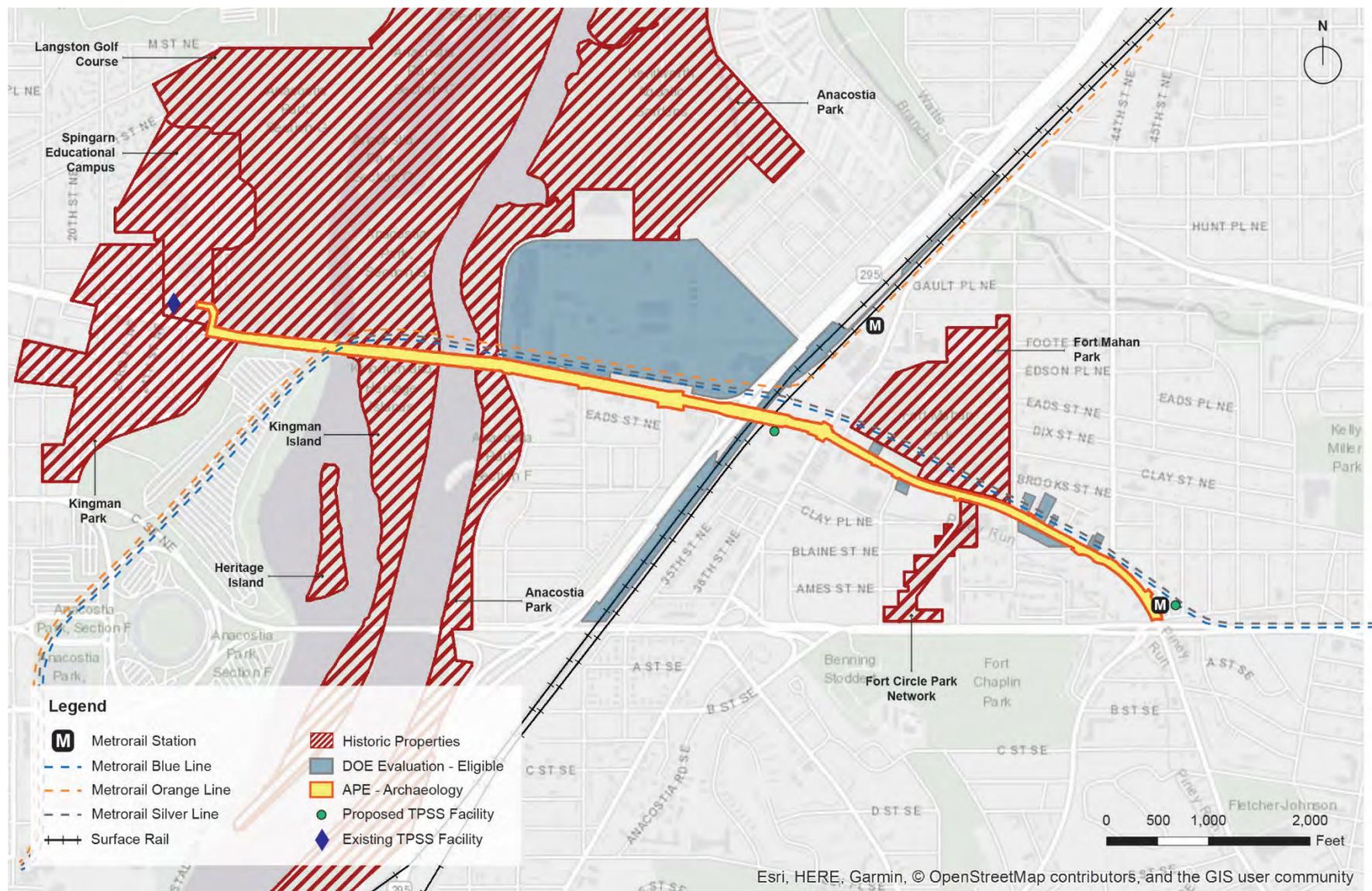
The source of propulsion power for the proposed streetcar service would be electricity. DDOT is considering wired or wireless options for each build alternative. As described for Build Alternative 1, wired and wireless propulsion system options for Build Alternative 2 are preliminarily determined to have no adverse effect on historic properties.

3.2.6 DC Streetcar Car Barn Training Center

The proposed connection to the DC Streetcar Car Barn Training Center would be located within the DDOT right-of-way within the boundaries of the Browne, Phelps, Spingarn, and Young Educational Campus Historic District, as well as the Kingman Park Historic District. While the connection to the car barn is within these historic districts, it would be constructed entirely within the existing roadway and is therefore on land that is not part of an historic property and would not be adjacent to or near an historic property. The connection is preliminarily determined to have no adverse effect on historic properties.

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Figure 33: Potential TPSS Locations



3.3 Treatment of Historic Properties

In the letter dated December 5, 2019, DC SHPO concurred with FHWA’s determination that the undertaking would have no adverse effect on the historic properties, provided that the avoidance measures are implemented and the following two conditions are met: .

- FHWA/DDOT will consult with DC SHPO to determine the appropriate sites to relocate the historic fire and police call boxes in order to ensure their integrity of location and setting is diminished as little as possible (i.e. the relocation sites should be as close as possible to their historic locations); and
- FHWA/DDOT will consult further with DC SHPO to determine the need for phased archaeological investigations in previously unsurveyed areas where ground disturbing activities are proposed.

In addition to these commitments, DDOT will preserve the integrity of historic properties by:

- Implementing design features which will reduce the noise generated by streetcar operations to the greatest degree possible;
- Replacing street trees slated for removal; and
- Investigating the feasibility of burying overhead utility lines in key locations to further reduce the influence of new visual elements.

As the project moves into final design, DDOT will continue consultation with SHPO to identify if any aspect of the project has a potential to adversely affect any intact archeological resources and if a Phase I archeological survey is needed.

4.0 Conclusions

Based on the evaluations of historic properties and archaeological resources in terms of eligibility for the NRHP and the assessment of effects for the undertaking, FHWA determined that the proposed action would not adversely affect historic properties in accordance with Section 106 of the NHPA and its implementing regulations (36 CFR 800). As described above, DC SHPO has provided conditional concurrence towards FHWA’s determination. As the project moves into final design, DDOT will continue to coordinate with the DC SHPO.

5.0 References

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6.0 Attachment A

List of Attachment Items

Letter Initiating 106 Consultation Process.....	F-A001
<i>Date: February 18, 2014</i>	
Initial DC SHPO Comments on 106 Consultation	F-A004
<i>Date: March 25, 2014</i>	
DC SHPO Comments on DOE Forms.....	F-A006
<i>Date: August 20, 2014</i>	
DC SHPO Comments on DOE Forms.....	F-A023
<i>Date: April 8, 2015</i>	
The Committee of 100 of the Federal City Consulting Party Response Letter	F-A026
<i>Date: Sept 19, 2015</i>	
FHWA Section 106 Effects Determination and 4(f) Temporary Occupancy Letter	F-A027
<i>Date: Dec 4, 2019</i>	
Draft Section 106 Technical Memorandum	F-A031
<i>Date: Nov 2019</i>	
DC SHPO Section 106 Concurrence Letter	F-A104
<i>Date: Dec 5, 2019</i>	

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF TRANSPORTATION

d. Infrastructure Project Management Administration

February 18, 2014

Mr. David Maloney
District of Columbia State Historic Preservation Office
1100 4th Street, SW
Suite E650
Washington, DC 20024

Subject: Benning Road and Bridge Transportation Improvements Environmental Assessment
and Section 106 Evaluation

Dear Mr. Maloney:

The District Department of Transportation (DDOT), in cooperation with the Federal Highway Administration (FHWA) is preparing an Environmental Assessment (EA) for the Benning Road and Bridge Transportation Improvements Project in accordance with the National Environmental Policy Act (NEPA). The project will also consider effects to historic properties in accordance with the requirements of Section 106 of the National Historic Preservation Act (16 USC §470) and its implementing regulations (36 CFR Part 800). The purpose of this letter is to initiate Section 106 consultation for the Benning Road and Bridge Transportation Improvements Project.

The Benning Road and Bridge Transportation Improvements Project is located in Northeast Washington, DC. The project area extends from the intersection of Benning Road and Oklahoma Avenue to the Minnesota Avenue and Benning Road Metrorail Stations (see attached location map). The majority of proposed improvements would occur within the existing right-of-way and would address Safety, Roadway and Bridge conditions, Multi-modal Transportation Improvements, Transit needs, and pedestrian safety and access. The agency scoping meeting for the project will be held on Tuesday March 4, 2014 at 9:00 am at DDOT Office, Conference Room 439, 55 M St, SE, Washington DC 20003 as part of the monthly DDOT Interagency meeting.

District Department of Transportation | 55 M Street, SE, Suite 400, Washington, DC 20003 | 202.671.2800 | ddot.dc.gov

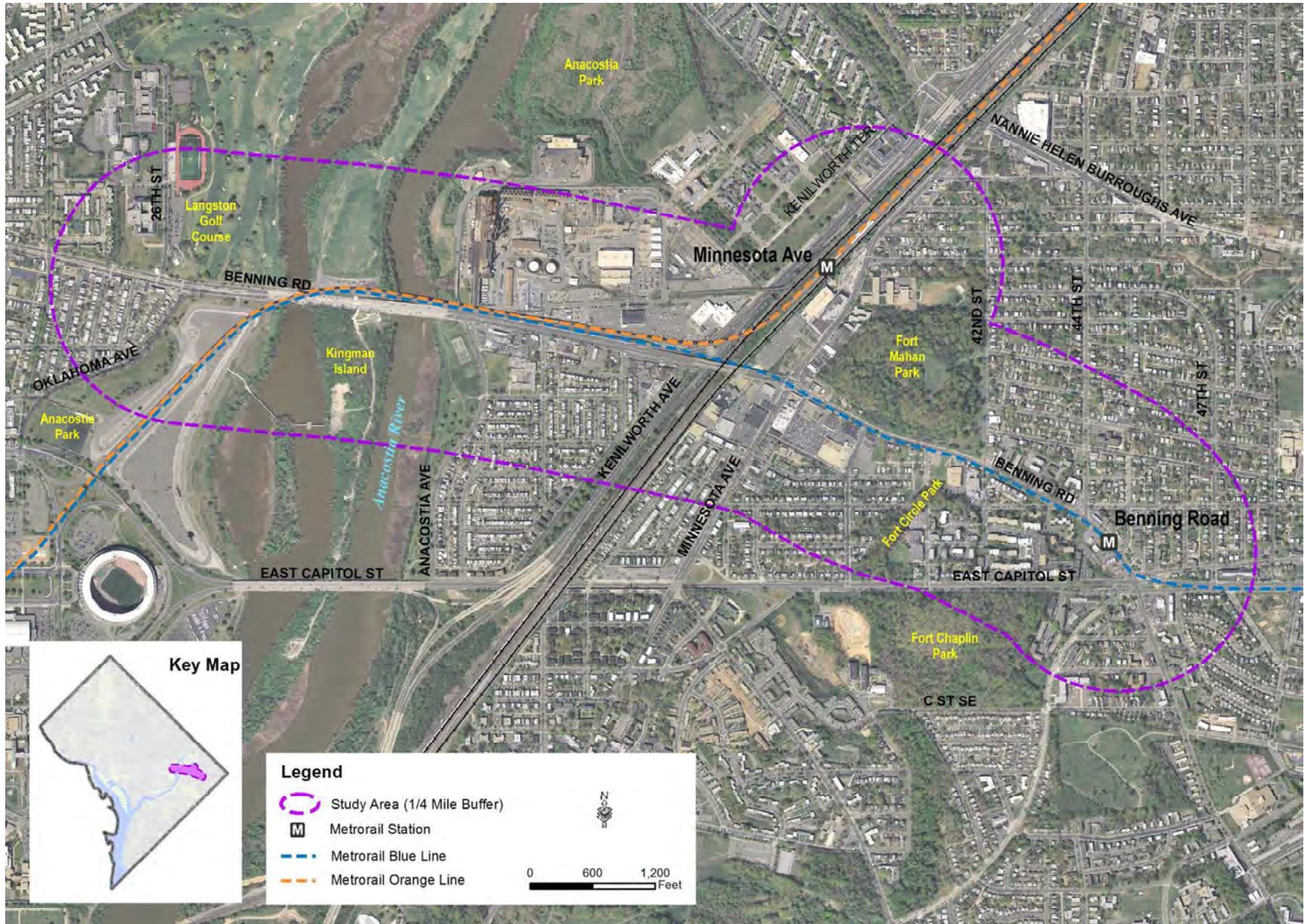
We will contact you shortly to set up meetings to discuss this project. Please contact me if you have additional questions or comments. Thank you very much, and we look forward to working with you on this project.

Sincerely,

Clarence Dickerson
Project Manager,
202-671-4586

Cc: Faisal Hameed, DDOT
Mike Hicks, FHWA
Daniel Koenig, FTA
Andrew Lewis, DC SHPO
Jennifer Hirsh, NCPC
David Hayes, NPS
Carol Legard, ACHP

Figure 1: Project Location Map



GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



March 25, 2014

Mr. Clarence Dickerson
Project Manager
District Department of Transportation
Infrastructure Project Management Administration
55 M Street, SE
Suite 400
Washington, DC 20003

RE: Initiation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

Dear Mr. Dickerson:

Thank you for initiating consultation with the DC State Historic Preservation Office (SHPO) regarding the above-referenced undertaking which we understand is to be carried out with assistance from the Federal Highway Administration and the Federal Transit Administration. We are writing in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800, to provide our initial comments regarding effects on historic properties.

Based upon a review of your submittal and recent discussions with DDOT staff, we understand that the project will involve a variety of transportation-related improvements designed to facilitate an extension of the forthcoming “One City Streetcar Line” from the intersection of 26th Street and Benning Road, NE to locations near the Benning Road and/or Minnesota Avenue Metro Stations. Since the project is still in the early planning phases, a draft Area of Potential Effect (APE) has yet to be prepared but, by referring to the “Study Area” shown in the image to the right, we identified several known historic properties and several which we believe should be evaluated using our Determination of Eligibility Form in order to determine whether they are eligible for listing in the National Register of Historic Places. The known historic properties and those recommended for evaluation are listed on the following pages.



Mr. Clarence Dickerson
Initiation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)
March 25, 2014
Page 2

The listed/eligible properties include:

1. The Langston Terrace Dwellings at 21st Street and Benning Road, NE
2. Spingarn High School at 2500 Benning Road, NE
3. The Brown, Phelps, and Young Schools just to the north of Spingarn
4. The Langston Golf Course
5. The Anacostia Park Historic District
6. The Senator Theater Entrance Pavilion at 3950 Minnesota Avenue, NE
7. Fort Circle Parks Historic District/Fort Mahan
8. Engine Company No. 27 at 4201 Minnesota Avenue, NE
9. Mayfair Mansions at Kenilworth Avenue, Jay and Hayes Streets, NE

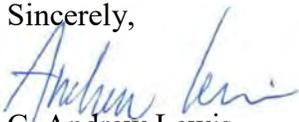
The properties recommended for evaluation using a DOE Form include:

1. The Pepco Power Plant Complex at Benning Road
2. 3341 Benning Road, NE: a streamlined currently building known as the “Washington Insurance”
3. 3439 Benning Road, NE: a mid-1940s automobile-related shopping complex
4. 3445 Benning Road, NE: a substantially altered, but relatively early building
5. 4202 Benning Road, NE: potentially associated with late 19th century African-American Community/Designed by African-American architects
6. 4208 Benning Road, NE: Potentially associated with late 19th century African-American Community/Designed by African-American architects
7. 4248 Benning Road, NE: a building with some modest architectural detail
8. 4270 Benning Road, NE: “New Mount Calvary Baptist Church” may have been relocated from the east side of East Capitol and the former site of Payne’s Cemetery.
9. 4510 East Capitol Street, NE: the “Shrimp Boat” was constructed c. 1953 and already considered a “landmark” of sorts by the local community.

Please note that additional survey and/or DOEs may be recommended after we learn more about the scope of the project, review a draft APE, and consider the comments of the consulting parties. Also note that, depending upon the extent and location of ground disturbing activities associated with the project, archaeological survey may be required in order to determine the potential for effects on archaeological resources.

We look forward to consulting further with all parties to continue the Section 106 review of this undertaking. If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841 (for historic built environment) or Ruth Troccoli at ruth.troccoli@dc.gov or 202-442-8836 (for archaeology). Otherwise, thank you for providing this initial opportunity to review and comment.

Sincerely,



C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

14-069

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



August 20, 2014

Mr. Clarence Dickerson
Project Manager
District Department of Transportation
Infrastructure Project Management Administration
55 M Street, SE
Suite 400
Washington, DC 20003

RE: Continuation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

Dear Mr. Dickerson:

Thank you for providing additional information about the above-referenced undertaking. Based upon our review of the supplemental documentation and the discussions held during our recent monthly meetings with DDOT, we are writing in accordance with Section 106 of the National Historic Preservation Act to provide further comments regarding the identification of, and potential effects on, historic properties.

We have reviewed the revised Area of Potential Effect (APE) for the project (shown in the image below) and concur that it should be generally sufficient to take into account the direct and indirect effects of the project, based upon the information we have reviewed to-date. However, we recommend that the schools along 26th Street, NE (i.e. Spingarn, Brown, Phelps and Young) be included in the APE since their location atop the hill provides an unobstructed view of the project area along Benning Road.

These properties have already been determined eligible for listing in the National Register of Historic Places as a historic district that has yet to be named. If necessary, the APE can be further revised at a later time to address other potential historic properties that may be affected by the project.



Mr. Clarence Dickerson

Continuation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

August 20, 2014

Page 2

As you may recall, the following properties were recommended for evaluation using a Determination of Eligibility (DOE) Form in our letter of March 25, 2014:

1. The Pepco Power Plant Complex at Benning Road
2. 3341 Benning Road, NE: a streamlined currently building known as the “Washington Insurance”
3. 3439 Benning Road, NE: a mid-1940s automobile-related shopping complex
4. 3445 Benning Road, NE: a substantially altered, but relatively early building
5. 4202 Benning Road, NE: potentially associated with late 19th century African-American Community/Designed by African-American architects
6. 4208 Benning Road, NE: Potentially associated with late 19th century African-American Community/Designed by African-American architects
7. 4248 Benning Road, NE: a building with some modest architectural detail
8. 4270 Benning Road, NE: “New Mount Calvary Baptist Church” may have been relocated from the east side of East Capitol and the former site of Payne’s Cemetery.
9. 4510 East Capitol Street, NE: the “Shrimp Boat” was constructed c. 1953 and already considered a “landmark” of sorts by the local community.

Since our initial letter, the project consultants have identified a number of other properties within the APE that are 50 years old or older and recommended for survey. Based upon our review of those properties, we offer the following comments:

10. Call boxes along Benning Road, NE: evaluate with a DOE.
11. 4001 Benning Road, NE: evaluate with a DOE.
12. 3399 Benning Road, NE: evaluate with a DOE.
13. 3621 Benning Road, NE: no need to evaluate with a DOE. No distinction or integrity.
- 14(a). Vicinity of 3700 Benning Road, NE: evaluate with a DOE.
- 14(b). 3703-05 Benning Road, NE: previously considered as part of DC Warehouse Survey. Not identified as eligible, but may have potential for significance based upon more in-depth research. Evaluate with a DOE.
15. 3917 Benning Road, NE: no need to evaluate with a DOE. No distinction or integrity.
16. 3919 Benning Road, NE: no need to evaluate with a DOE. Extensively altered. No integrity.
17. 3934 Benning Road, NE: no need to evaluate this particular residence.
18. 3938 Benning Road, NE: most likely the work of African-American Architect Lewis Giles (see attached partial bio). Evaluate with a DOE.
19. 3940 Benning Road, NE: most likely the work of African-American Architect Gus Bull (see attached partial bio). Evaluate with a DOE.
20. 3942 Benning Road, NE: no need to evaluate this particular residence.
21. 4035-4037 Benning Road, NE: no need to evaluate this particular residence.
22. 4049 Benning Road, NE: no need to evaluate this particular residence.
23. 4053 Benning Road, NE: most likely the work of African-American Architect Lewis Giles (see attached partial bio). Evaluate with a DOE.
24. 4057 Benning Road, NE: no need to evaluate this particular residence.
25. 4061 Benning Road, NE: no need to evaluate this particular residence.

Mr. Clarence Dickerson

Continuation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

August 20, 2014

Page 3

26. 4145 Benning Road, NE: previously determined unlikely to be eligible based on cursory review. Additional research would be beneficial. Evaluate with a DOE.
27. 4201-4243 Benning Road, NE: part of historically black community called "Capital View." Evaluate with a DOE.
28. 4228 Benning Road, NE: most likely the work of African-American Architect R. C. Archer (see attached partial bio). Evaluate with a DOE.
29. 4234 Benning Road, NE: most likely the work of African-American Architect Lewis Giles (see attached partial bio). Evaluate with a DOE.
30. 4236 Benning Road, NE: most likely the work of African-American Architect Cyril Bow (see attached partial bio). Evaluate with a DOE.
31. 4244 Benning Road, NE: no need to evaluate this particular residence.
32. 4246 Benning Road, NE: no need to evaluate this particular residence.
33. 4254 Benning Road, NE: most likely the work of African-American Architect Lewis Giles (see attached partial bio). Evaluate with a DOE.
34. 4256-4264 Benning Road, NE: evaluate with a DOE. May date to 1954 and fall outside the scope of "Apartment Buildings in Washington DC 1880-1945" Multiple Property Document.
35. 4280 Benning Road, NE: most likely the work of George T. Santmyers. Evaluate with a DOE. May date to 1942 and fall within the scope of "Apartment Buildings in Washington DC 1880-1945" Multiple Property Document.
36. 4280 Benning Road, NE: no need to evaluate this particular residence.
37. 4414 Benning Road, NE: previously determined ineligible. No longer extant.
38. 4430 Benning Road, NE: No longer extant.
39. 4212 East Capitol Street, NE: evaluate with a DOE.

We look forward to continuing consultation. To that end, some additional information about the above-referenced architects may be available in our files. We will be pleased to make this information available for purposes of completing the requested DOE Forms. And as for archaeology, much of the project area has not been surveyed. Please remember to begin identifying staging areas and other sites where ground disturbing activities may be anticipated outside of the existing streets. We will provide additional comments regarding the need for any archaeological survey after more specificity about project-related ground disturbance can be established.

If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841 (for historic built environment) or Ruth Troccoli at ruth.troccoli@dc.gov or 202-442-8836 (for archaeology). Otherwise, thank you for providing this additional opportunity to review and comment.

Sincerely,



C. Andrew Lewis

Senior Historic Preservation Specialist
DC State Historic Preservation Office

14-069

1100 4th Street, SW, Suite E650, Washington, D.C. 20024 Phone: 202-442-7600, Fax: 202-442-7638

LEWIS WENTWORTH GILES, SR. (1894-1974)

Lewis Wentworth Giles was born in 1894 in Amelia County, in southside Virginia southwest of Richmond. Although Giles has been little studied, he appears to have been one of Washington's most prolific early 20th century African American architects. By 1908, Giles had moved to Washington where he attended Armstrong Technical School, graduating in 1913.¹ He attended the University of Illinois from 1914 to 1917² but was drafted into the army before he could graduate.³ He worked for African American architect Isaiah T. Hatton (see biography) from 1918 until Hatton's untimely death in 1921.⁴ Giles appears to have continued Hatton's practice from office space in the Pythian (True Reformer Building) at 12th and U Street, NW.⁵ In 1929, he moved his practice to his Deanwood residence at 4428 Hunt Place, NE, where he remained through 1950. Like a number of African American architects, Giles did not seek registration until 1950, when the law changed to require architectural registration for preparation of plans for buildings over 2 stories or 1000 sq. ft. Giles' son, Lewis Giles, Jr. (see biography), also went to the University of Illinois and became an architect. Lewis Giles, Sr. died in 1974.⁶

Sources: D.C. Board of Examiners and Registrars of Architects Case Files; D.C. City Directories; D.C. Engineer's Records for Isaiah T. Hatton; Lee, J.V. "Deanwood Historic Study: The Role of Black Architects in the Development of Deanwood;" Oral interview with Lewis Giles, Jr.

Illustrations: Material from Lewis Giles, Sr. scrapbook

Further work: Incorporate material from oral interview with Lewis Giles, Jr.
Incorporate material from Lewis Giles, Sr. scrapbook

BB: 10/16/95

GUS BULL

Gus Bull was listed as an architect in the 1936 City Directory. His residence was located at 2224 12th Place, N.W. In 1933, the Board of Architectural Registration noted that "the name G.N. Bull, Architect" was printed on Romulus Archer's letterhead and wrote Archer that "Mr. Bull is not entitled to any designation which would indicate or imply that he is an architect or a registered architect."¹ Bull designed houses in Deanwood.²

Sources: D.C. City Directories; D.C. Board of Examiners and Registrars of Architects Case File for Romulus Archer; Lee, J.V. "Deanwood Historic Study: The Role of Black Architects in the Development of Deanwood."

Illustration: None

BB: 10/9/95

ROMULUS C. ARCHER, JR. (1890-1968)

Romulus Cornelius Archer, Jr. was born in Norfolk, Virginia in 1890 and died in Washington, D.C. in 1968. Both his father and uncle were contractors in Virginia.¹ Archer worked as a carpenter before he became an architect.² He was the son of Romulus C. Archer, a contractor who was listed in the 1908 Norfolk City Directory as a plasterer.³ Archer attended Norfolk public schools, graduating from high school in June 1908. He enrolled in Norfolk Mission College for two terms (1908-1910) and in another school for three terms (1911-1913).⁴ He then attended Columbia University's School of Architecture for one year in 1913.⁵

In his application for registration, Archer stated that he began the practice of architecture in 1915.⁶ Archer joined the Army in 1916 and served as a bandsman in World War I.⁷ From June 1921 through November 15, 1921, Archer worked in the Supervising Architect's office in the U.S. Treasury Department. He opened his own office in Washington in December 1921, producing designs for churches, educational buildings, and small commercial structures. Archer was among the first African American architects to be registered in the District of Columbia. His registration number was 117, dated January 15, 1926. Archer's letterhead for that year listed "branches" in Norfolk and Durham.⁸

During World War II Archer worked as a drafting instructor for the government.⁹ In addition to his registration in the District, Archer was registered to practice architecture in Maryland, North Carolina, and Virginia. In 1954 he received the Washington Board of Trade Award for Superior Design and in 1964 the "Y" Men named him "Citizen of the Year" for providing employment opportunities for minorities.¹⁰ Gus Bull, Victor Agebite,

Continued Next Page

Leroy Brown, and John Nixon were among the African Americans who worked in Archer's office.¹¹

Archer was a member of the National Technical Association and served as the organization's treasurer for a number of years. He was also a member of the Florida Avenue Baptist Church, which he joined in 1921. Archer was married to Louise Archer, a teacher who was a native of Fayetteville, North Carolina. At the time of her death in 1948, she resided in Durham, North Carolina.¹² Both she and Archer are buried in Arlington National Cemetery.

Sources: Arlington National Cemetery Burial Records (Arlington National Cemetery Administration); D.C. City Directories; D.C. Board of Examiners and Registrars of Architects Case Files; Ethridge, Harrison Mosley. "The Black Architects of Washington, D.C., 1900-Present. Ph.D. Dissertation, Catholic University of America, 1979; Oral Interview with John H. Nixon, July 1994; "Romulus C. Archer, Jr., 77, Architect Here for 40 Years." *Evening Star*, December 1, 1968; Wells, John. "The Virginia Architects, 1820-1955," mss. of forthcoming book, courtesy of the author; Wirz, Hans and Richard Striner. *Washington Deco: Art Deco in the Nation's Capital*. Washington: Smithsonian Institution Press, 1984.

Illustrations: Photo with obit

Further Work: Check Board of Trade files -- bldg for 1954 award
Check 1964 NTA Bulletin for Obituary

CYRIL G. BOW

Originally from Syracuse, New York, Cyril Bow received his B. Arch. from Cornell University. For many years he was the chief draftsman in the office of Albert I. Cassell.¹

His wife, Marguerite Smith Bow, was a music teacher in the Washington public schools for 33 years (Wormley, Young and Phillips schools). She graduated from Miner Normal School and Howard University School of Music (1924). The Bows were members of St. Mary's Episcopal Church. Mrs. Bow died in 1945 and was buried in Harmony Cemetery.²

Sources: Obituary of wife Marguerite Smith Bow. *Washington Post* and *Washington Star*, July 8, 1945; Julian Euell. Oral history interview with Clarence B. Wheat, ; Historic American Buildings Survey documentation for Founders Library compiled by Harrison M. Ethridge; National Technical Association, *National Technical Year Book, 1936-37*, Detroit, 1937; National Technical Association, *National Technical Association Directory, 1949*.

Illustrations: None

Further Research: Call St. Mary's.

HE: 10/16/95



AECOM
516 East State Street
Trenton, NJ 08609
www.aecom.com

609-599-4261 tel
609-392-3785 fax

Memorandum

To Karl Kratzer, AECOM Page 9

CC Angela Jones; John Lawrence (AECOM)

Subject Benning Road Improvements, Historic Architecture Identification Effort

From Johnette Davies

Date June 25, 2014 Revised July 28, 2014

In March 2014, the District of Columbia Historic Preservation Office (DCHPO) provided preliminary guidance about the potential for historic resources within the project study area, including properties recommended for survey and National Register eligibility evaluation under Section 106 of the National Historic Preservation Act. This guidance was based upon a review of known and potential properties in the project Study Area.

The purpose of this memorandum is to confirm the level of effort required to meet the good faith historic properties identification requirement under Section 106. This memorandum provides a proposed Area of Potential Effect (APE) for the project and identifies properties within the proposed APE for the Preferred Alternative (eliminating properties along Minnesota Avenue) that meet the 50-year age criteria for National Register eligibility evaluation. It also enumerates properties previously recommended for survey by DCHPO, as well as additional properties recommended for survey by AECOM.

Properties Recommended for Evaluation by DCHPO

In a letter dated March 25, 2014, DCHPO recommended that the following properties be evaluated for this project:

Table 1: Properties Recommended for Evaluation by DCHPO		
Number	Address	Notes
1	3300 Benning Road, NE	Pepco Power Plant Complex. Built in 1906, the plant was expanded in 1968 and 1972
2	3341 Benning Road, NE	a streamlined building currently known as the "Washington Insurance" building
3	3431-39 Benning Road, NE	a mid-1940s automobile-related shopping complex
4	3445 Benning Road, NE	a substantially altered, but relatively early building, now "Benning Liquors"
5	4202 Benning Road, NE	potentially associated with late 19 th -century African-American community/designed by African-American architects
6	4208 Benning Road, NE	Potentially associated with late 19th century African-American community/designed by African-American



		architects
7	4248 Benning Road, NE	building with some modest architectural detail
8	4270 Benning Road, NE	New Mount Calvary Baptist Church; may have been relocated from the east side of East Capitol and the former site of Payne's Cemetery
9	4510 East Capitol Street, NE	The "Shrimp Boat:" constructed c. 1953, it is already considered a "landmark" of sorts by the local community

The location of these and all other properties described in this document is shown on the attached graphic entitled "Potential Historic Properties in the APE." The map shows where each parcel is located. Please note that some parcels show footprints for buildings less than 50 years of age.

Properties Recommended for Survey by AECOM

In addition to the specific properties identified by DCHPO in Table 1, the agency's letter further states the following:

Please note that additional survey and/or DOEs may be recommended after we learn more about the scope of the project, review a draft APE, and consider the comments of the consulting parties.

The properties in **Table 2** below are recommended for survey because they may have historic or architectural significance based upon preliminary research to date and a brief field view; they also appear to have good integrity.

Table 2: Additional Properties Recommended for Evaluation

Number	Address	Notes	
10	Benning Road, NE	Call boxes along roadside (photo shows typical examples)	
11	4001 Benning Road, NE	Stewart's Funerals: funeral home built in 1964 for an African-American family-owned and operated business founded in 1900.	



Additional Properties 50 Years or Older in the APE

There are a number of additional properties along the corridor that meet the 50-year age criterion for evaluation that were not included in DCHPO or AECOM recommendations; these are listed in **Table 3**, below. It is unknown at this time whether any of the apartment buildings in Table 3 were built within the period of significance defined in the Multiple Property Documentation Form, "Apartment Buildings of Washington DC 1870-1945." All properties below are in order from west to east.

Table 3: Additional Properties 50 Years and Older in the APE			
Number	Address	Notes	
12	3399 Benning Road, NE	Mid-20 th -century auto sales and service building, now D&C Cab	
13	3621 Benning Road, NE	c. 1952 warehouse and cold storage facility, now Sam's Auto Car/ New Horizons Auto Body Repair	
14	Vicinity of 3700 Benning Road, NE	Former Baltimore & Potomac Railroad/ Alexandria Branch, Baltimore & Ohio Railroad/Pennsylvania Railroad	[no photo]
15	3703-05 Benning Road, NE	Appears to be early 20 th -century warehouse/storage facilities	



16	3917 Benning Road, NE	Connected to a strip mall that faces Minnesota Avenue; little to no historical integrity	
17	3919 Benning Road, NE	Early-20 th -century building; some Art Deco details remain at a portion of the cornice, but otherwise altered	
18	3934 Benning Road, NE	Early 20 th -century residence, Tudor Revival	
19	3938 Benning Road, NE	Early 20 th -century residence, Four Square (building at left in photograph)	
20	3940 Benning Road, NE	Early 20 th -century residence, Colonial Revival (building at right in photograph)	



21	3942 Benning Road, NE	Early 20 th -century residence, Colonial Revival	
22	4035-4037 Benning Road, NE	Mid-20 th -century triplex, Tudor Revival	
23	4049 Benning Road, NE	Early 20 th -century duplex	
24	4053 Benning Road, NE	Early 20 th -century residence	
25	4057 Benning Road, NE	Early 20 th -century residence	



<p>26</p>	<p>4061 Benning Road, NE</p>	<p>Mid-20th-century residence, altered bungalow</p>	
<p>27</p>	<p>4145 Benning Road, NE</p>	<p>Mid-20th-century police station; extension along 42nd St.</p>	
<p>28</p>	<p>4201-4243 Benning Road, NE</p>	<p>Early-mid-20th-century block of rowhouses</p>	
<p>29</p>	<p>4228 Benning Road, NE</p>	<p>Mid-20th-century apartment building</p>	
<p>30</p>	<p>4234 Benning Road, NE</p>	<p>Early 20th-century residence (building at left in photograph)</p>	



31	4236 Benning Road, NE	Mid-20 th -century apartment building (building at right in photograph)	
32	4244 Benning Road, NE	Early 20 th -century residence (building at left in photograph)	
33	4246 Benning Road, NE	Early 20 th -century residence with commercial front addition (second building from left in photograph)	
34	4254 Benning Road, NE	Early 20 th -century residence	
35	4256-4264 Benning Road, NE	Mid-20 th -century apartment buildings	



<p>36</p>	<p>4274 Benning Road, NE</p>	<p>Mid-20th-century apartment building (building at right in photograph)</p>	
<p>37</p>	<p>4280 Benning Road, NE</p>	<p>Early 20th-century residence, brick bungalow</p>	
<p>38</p>	<p>4414 Benning Road, NE</p>	<p>Mid-20th-century restaurant</p>	
<p>39</p>	<p>4430 Benning Road, NE</p>	<p>Former filling station, mid-20th-century</p>	
<p>40</p>	<p>42121 E. Capitol St, NE</p>	<p>Fort Chaplin Park Apartments & Townhomes. Some buildings in the complex face the 4300 block of Benning Road</p>	



41	217-223 42 nd Street, NE	Mid-20 th -century duplexes	
42	227 and 231 42 nd Street, NE	Mid-20 th -century apartments	

A transit Car Barn that meets the 50-year age criterion for evaluation is located within the PEPCO Power Plant parcel, along Kenilworth Avenue. However, later buildings and the elevated Metro line effectively screen the proposed work from the building's viewshed and setting. We recommend that the Car Barn does not require evaluation for the purposes of this project.

Proposed Next Steps

The next step for the project is to seek concurrence among DDOT, and DCHPO regarding the level of effort required for the identification of historic properties for this project. The agencies should determine whether all of the potential resources listed in the tables above must be evaluated, whether to limit the evaluations to those previously recommended by DCHPO, or a combination thereof to meet the good faith identification requirement under Section 106. A DCHPO Determination of Eligibility (DOE) form will need to be completed for each property ultimately recommended for survey and evaluation.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



April 8, 2015

Mr. Michael Hicks
Environmental Manager
U.S. Department of Transportation
Federal Highway Administration
District of Columbia Division
1990 K Street, NW
Suite 510
Washington, DC 20006-1103

RE: Formal Initiation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

Dear Mr. Hicks:

Thank you for your letter of March 16, 2015 which served to formally initiate consultation with the District of Columbia State Historic Preservation Officer (DC SHPO) regarding the above-referenced undertaking. As you are aware, we have been working with DDOT over the last several months to carry out preliminary identification and evaluation efforts that will assist FHWA in meeting its obligations under Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

Of particular note are a number of Determination of Eligibility (DOE) Forms that were prepared by the project consultants and forwarded to our office for review. We appreciate that the forms were thoroughly researched and well-written. Our overall recommendations regarding National Register eligibility are summarized in the attached table. More detailed comments have been incorporated directly into the DOEs which we will forward electronically.

We look forward to consulting further with FHWA and all parties to continue the Section 106 review process. If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841 (for historic built environment) or Ruth Trocolli at ruth.trocolli@dc.gov or 202-442-8836 (for archaeology). Otherwise, thank you for providing this opportunity to review and comment.

Sincerely,

C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

14-069

Mr. Michael Hicks
 Formal Initiation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)
 April 8, 2015
 Page 2

DC SHPO Recommendations Regarding the Determinations of Eligibility for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

	Recommended Eligible by DC SHPO	Recommended Ineligible by DC SHPO
1		217-223 42nd Street NE
2		227 - 231 42nd Street NE
3	3300 Benning Road NE; PEPCO Power Plant Bld 32	
4		3341 Benning Road NE
5		3399 Benning Road, NE; District Cab Company
6		3423 - 3439 Benning Road, NE
7		3455 Benning Road, NE; Benning Liquors
8		3701 Benning Road, NE; A. Loeffler Sausage & Provisions Co.
9	3938 Benning Road, NE	
10		3940 Benning Road, NE; Kerrick House
11	4001 Benning Road, NE; Stewarts Funerals	
12		4053 Benning Road, NE
13		4145 Benning Road, NE; Police Station/MPD HQ
14	4201 - 4243 Benning Road, NE	
15		4202 Benning Road, NE; Mike's Market; Sherman's Market
16	4208 Benning Road, NE	
17	4228 Benning Road, NE; Benning Road Apartments	
18		4234 Benning Road, NE
19	4236 Benning Road, NE	
20		4248 Benning Road, NE
21		4254 Benning Road, NE
22		4256 - 4264 Benning Road, NE
23	4270 Benning Road, NE; New Mt. Calvary Baptist Church	
24	4274 Benning Road, NE	
25		4510 Benning Road, NE; The Shrimp Boat Restaurant
26		B&O Railroad Alexandria Branch
27	B&P Railroad	
28	Fire and Police Call Boxes along Benning Road, NE	

4212 East Capitol Street, NE – Fort Chaplin Park
 Apartments also determined ineligible

Hachey, Alan

From: Walker, Paul K (DHCD) <paul.k.walker@dc.gov>
Sent: Tuesday, March 11, 2014 12:36 PM
To: Clarence.Dickerson@dc.gov; Kratzer, Karl
Cc: Anyaegbunam, Oke (DHCD)
Subject: Benning Rd and Bridge Transportation Improvements Environmental Assessment

Clarence and Karl

I have read and reviewed the DDOT attachment that was sent to Robert Trent, former Chief of Staff here at the Department of Housing and Community Development. At this time we have no issues, comments or suggestion regarding the assessment of the environment and cultural resources for this project. Thank you for your consideration in this matter.

Sincerely
Paul Walker
Architect
Development Finance Division
Department of Housing and Community Developemnt

As you spring forward, check your smoke alarm. It may be time for a new one. The DC Fire and Emergency Medical Services Department provides free installations of smoke alarms for owner-occupied District homes. Request an installation at <http://311.dc.gov> or call 202-673-3331.

The Committee of 100 on the Federal City



www.committeeof100.net

September 19, 2015

Federal Highway Administration
Attn: Mr. Michael Hicks
District of Columbia Division
1990 K Street, NW, Suite 510
Washington, DC 20006-1103
Michael.Hicks@dot.gov

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202.681.0225

info@committeeof100.net

RE: Section 106 Consulting Party Invitation for Benning Road & Bridge Transportation Improvement Project Environmental Assessment

Dear Mr. Hicks,

In response to Mr. Joseph Lawson's letter of July 27, 2015 inviting the Committee of 100 on the Federal City to serve as a Section 106 Consulting Party on the referenced project, this letter serves as the Committee of 100's acceptance. We are pleased to have been invited and look forward to participating in the Section 106 process for this important project.

The Committee of 100 on the Federal City has long been concerned with protecting and enhancing, in our time, the various elements of the L'Enfant Plan (1791-92) and the planning work of the McMillan Commission (1901-02) even as the city continues to evolve in the 21st century.

Official written correspondence should be sent to our mailing address as noted herein. Please send e-mails to the following addresses to help us ensure adequate representation at all meetings and distribution of documents within the Committee of 100:

Primary Representative: Monte Edwards monte.edwards@verizon.net

Secondary Representative: Meg Maguire megmaguireconsultant@msn.com

C100 Executive Staff: Byron Adams Badamsc100@verizon.net

Sincerely,

Meg Maguire
Transportation Subcommittee

Cc, Nancy MacWood, Sarah Campbell



U.S. Department
of Transportation
**Federal Highway
Administration**

District of Columbia Division

1200 New Jersey Avenue, SE
East Building (E61-205)
Washington, DC 20590
(202) 493-7020 – Office
www.fhwa.dot.gov/dcddiv/

In Reply Refer To: HFO-DC

December 4, 2019

Mr. Andrew Lewis
Senior Historic Preservation Officer
District of Columbia State Historic Preservation Office
1100 4th Street, SW, Suite E650
Washington, D.C. 20024

Dear Mr. Lewis:

In accordance with the National Environmental Policy Act of 1969 (NEPA); Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations 36 CFR Part 800, the District Department of Transportation (DDOT) in conjunction with the Federal Highway Administration (FHWA) is preparing an Environmental Assessment (EA) for the proposed Benning Road and Bridges Transportation Improvements project in northeast Washington, D.C. As you may recall, the District of Columbia State Historic Preservation Office (DC SHPO) was informed of the undertaking and initiation of the Section 106 process by letter on February 18, 2014. Consultations on the effects of this project have been ongoing with DC SHPO staff who have assisted in the determination of effects on historic and archaeological resources located in the vicinity of the project.

Proposed Action

The Draft EA, released in September 2017, identified two build alternatives. Build Alternative 1 involved constructing the proposed streetcar guideway along the east and westbound curbs of Benning Road while Build Alternative 2 involved constructing the proposed streetcar guideway along the median. Actions common to both Alternatives include:

- extend the H/Benning Streetcar service to the Benning Road Metrorail Station;
- replacement of the Lorraine H. Whitlock Memorial Bridge (Whitlock Bridge);
- modification of the Ethel Kennedy Memorial Bridge to support streetcar traffic;
- construction of a new rail connection to the D.C. Streetcar Can Barn;
- installation streetcar stations and propulsion systems; and
- various safety improvements for motorists, pedestrians, and cyclists.

Based on feedback collected during the public involvement process and the evaluation of potential impacts associated with parking and traffic of Build Alternative 1, DDOT has selected Build Alternative 2 as the Preferred Alternative.

Neither Build Alternative would require permanent conversion of historic properties or parklands for transportation use; however, temporary easements would be required to provide adequate space for construction activities. Both Alternatives would require relocation of historic fire call boxes at the southeast corner of the Benning Road, NE and 36th Street, NE intersection to another similar “location and setting” within the study area. Since the historic fire call boxes would retain their integrity of location and setting, a preliminary determination of “no adverse effect” to the historic fire call boxes has been determined.

Historic and Archeological Resources

Following initial consultation, DDOT used the project’s construction and operational activities to establish the area of potential effects (APE). The APE for archaeological resources encompasses the area that would experience direct impact from proposed ground disturbing activities. The historic built environment APE encompasses the area that is directly adjacent to the proposed undertaking, identified by a site visit and line-of-sight survey. In a letter dated August 20, 2014, DC SHPO concurred that the APEs would be sufficient for the assessment of direct and indirect effects. Within this boundary, DC SHPO identified 9 properties listed on the National Register of Historic Places (NRHP) and 9 properties eligible for listing (see Appendix A in the enclosed Section 106 Technical Memorandum). As the project progressed, the Kingman Park Historic District was added to the NRHP and a total of eleven properties within the historic built environment APE were determined to be eligible (see Tables 1 and 3 in enclosed Section 106 Technical Memorandum). As noted earlier, streetcar components of the Preferred Alternative (track, stops and propulsion system) would be located along the roadway median; therefore, they are farther away from adjacent historic properties.

Temporary easements would be required for the corridor of the Preferred Alternative located adjacent to Kingman and Heritage Island Park, Anacostia Park, the Baltimore & Potomac Railroad, and the PEPCO Powerplant. The temporary easements are required to install temporary fencing, erosion and sediment control measures, and provide adequate space for construction activities. In the Baltimore & Potomac Railroad corridor, the easements will extend approximately 30’ from the perimeter of the Whitlock Bridge. In Anacostia Park, Kingman and Heritage Island Park, and the PEPCO Powerplant, the easements will extend approximately 5’ from the existing edge of sidewalk. No new ground disturbance is expected due to temporary construction related staging.

The actions proposed under the Preferred Alternative could have potential “effects” to historic properties by introducing new sources of noise and vibration associated with the streetcar and visual intrusion associated with a streetcar stop on Benning Road near Fort Mahan Park (between 42nd Street and 44th Street). The noise impacts have been evaluated and determined “insignificant” due to the existing noise environment of the Benning Road corridor; therefore, the noise environment remains consistent. Regarding changes to visual quality (viewshed), DDOT will implement several measures including: burying overhead utilities in select locations; use of context-sensitive design practices which reduce the obtrusiveness of new transportation facilities; and replanting of street trees. The list of measures proposed to further reduce streetcar noise and vibration include: ballast mats; applying flange lubricators; and fixtures (e.g. flange lifters and pointless switches) which eliminate the impact noise from the steel wheel striking the rail gap.

For the archeological resources, since the proposed project occurs on highly disturbed land, it is anticipated that there would be no intact archeological resources within the direct APE of the project. In addition, much of the project area has not been surveyed. As the project moves into final design, DDOT will continue consultation with the SHPO to identify any aspect of the project with potential to “adversely effect” any intact archeological resources and determine if a Phase I archeological survey is required.

Section 106 Initiation, Consulting Party Coordination, and Public Meeting Summary

Since initiation of the Section 106 process, DDOT has distributed a series of project documents among the coordinating agencies, including DC SHPO. These documents include:

- Cooperating Agency Invitations (released May 2014)
- APE Concurrence (released by DC SHPO in August 2014)
- Formal Section 106 Initiation Letter (released by FHWA in March 2015)
- DOE Form Recommendations (released by DC SHPO in April 2015)

An invitation to participate in the Section 106 process as a consulting party was sent to 23 organizations. To date, only the Committee of 100 on the Federal City (Committee of 100) provided a written response demonstrating interest in serving as a consulting party under Section 106. Final Section 106 Report was provided to the Committee of 100 on October 1st, 2019 and their comments were solicited towards the proposed project. To date, DDOT has received no comments from the Committee of 100. DDOT has performed public outreach by holding five public meetings:

- May 18, 2019 - Ward & Leadership Council Meeting
- June 18, 2019 - Advisory Neighborhood Commission 7F
- June 19, 2019 - River Terrace Community Organization
- July 6, 2019 - Marshall Heights Civic Association
- September 19, 2019 – Department of Employment Services (4058 Minnesota Ave)

In addition, there has been ongoing community stakeholder meetings with small groups of the civic associations (Benning Road Civic Association, Kingman Park Civic Association, Parkside Civic Association, River Terrace Association) and ANCs (ANC 5D, ANC 7D, ANC 7E, ANC 7F) in the project area.

Determination of Effects to Cultural Resources

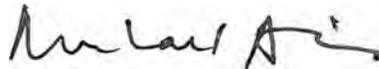
Since Federal funds are participating in this project the requirements of Section 106 of National Historic Preservation Act (NHPA) and its implementing regulations 36 CFR 800 are applicable. Based on the evaluations of historic properties and archaeological resources within the project’s APE and the preliminary assessment of “effects” for the undertaking, FHWA seeks concurrence from DC SHPO that the proposed Action would result in "No Adverse Effect" to historic properties in accordance with Section 106 of the NHPA and its implementing regulations (36 CFR 800).

Thank you for your continued cooperation regarding this project. A hard copy response can be sent to me at:

Federal Highway Administration
District of Columbia Division
1200 New Jersey Avenue, S.E.
East Building, Room E61-205
Washington D.C 20590

A digital copy of your response can be sent to me at: michael.hicks@dot.gov. You can also contact me at 202-493-7023 if you have any additional questions or need additional information or you can contact Robyn Jackson (DDOT) at robyn.jackson@dc.gov. Please copy Austina Casey (DDOT) at Austina.casey@dc.gov on any digital communications with me or my office regarding this project.

Sincerely,



Michael Hicks
Environmental/Urban Engineer

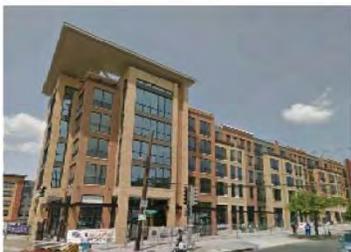
Enclosures: Benning Road and Bridges Transportation Improvements Section 106 Technical Memorandum

Cc: Robyn Jackson
Austina Casey
Kirti Rajpurohit

BENNING ROAD & BRIDGES TRANSPORTATION IMPROVEMENTS

SECTION 106 TECHNICAL MEMORANDUM

FINAL NOVEMBER 2019



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TABLE OF CONTENTS

1.0	Introduction	1
1.1	Proposed Action Overview.....	1
1.2	Description of Proposed Action- Area of Potential Effects.....	1
1.3	Purpose of Report.....	2
1.4	Selection of DDOT’s Preferred Alternative	4
2.0	Identification of Historic Properties	4
2.1	Methodology	4
2.2	Previously Identified Historic Properties.....	5
2.3	Potentially Eligible Historic Properties.....	12
2.4	Potential Archaeological Resources.....	20
3.0	Impacts to Historic Properties and Archaeological Resources	24
3.1	Methodology	24
3.2	Assessment of Effects	26
3.3	Treatment of Historic Properties	38
4.0	Conclusions	40
5.0	Resources	41
6.0	Appendix A	43

List of Figures

Figure 1: Project APEs for Historic Properties and Archaeology	3
Figure 2: Previously Identified Historic Properties	6
Figure 3: Civil War Defenses of Washington - Fort Mahan Park	7
Figure 4: Civil War Defenses of Washington – Fort Circle Park	8
Figure 5: Langston Golf Course	8
Figure 6: Anacostia Park, footbridges to Kingman and Heritage Islands	9
Figure 7: Kingman Island – Bridge to Heritage Island Park	9
Figure 8: Spingarn School.....	10
Figure 9: Browne School.....	10
Figure 10: Young School	11
Figure 11: Kingman Park Historic District – 23rd Place	11
Figure 12: Properties Assessed for Listing Eligibility on the NHRP	14
Figure 13: NHRP Eligible Resources (Group I)	15
Figure 14: NHRP Eligible Resources (Group II)	16
Figure 15: NHRP Eligible Resources (Group III)	17
Figure 16: Historic Properties and Noise Monitoring Sites.....	19
Figure 17: Areas of Recorded Disturbances in the APE.....	23
Figure 18: Oklahoma Avenue to Kingman Island, Build Alternative 1 (wired)	28
Figure 19: Oklahoma Avenue to Kingman Island, Build Alternative 1 (wired)	29
Figure 20: Kingman Island to 36 th Street, Build Alternative 1 (wired).....	29
Figure 21: Kingman Island to 36 th Street, Build Alternative 1 (wireless).....	30
Figure 22: Minnesota Avenue to 45 th Street, Build Alternative 1 (wired).....	30

Figure 23: Minnesota Avenue to 45th Street, Build Alternative 1 (wireless).....	31
Figure 24: Union Station Stop on H Street	31
Figure 25: Oklahoma Avenue to Kingman Island, Build Alternative 2 (wired)	34
Figure 26: Oklahoma Avenue to Kingman Island, Build Alternative 2 (wireless).....	34
Figure 27: Kingman Island to 36th Street, Build Alternative 2 (wired).....	35
Figure 28: Kingman Island to 36th Street, Build Alternative 2 (wireless).....	35
Figure 29: Minnesota Avenue to 45 th Street, Build Alternative 2 (wired).....	36
Figure 30: Minnesota Avenue to 45th Street, Build Alternative 2 (wireless).....	36
Figure 31: Median Platform at 42nd Street - Eastward View, Build Alternative 2 (wired)	37
Figure 32: Median Platform at 42nd Street - Westward View, Build Alternative 2 (wired)	37
Figure 33: Potential TPSS Locations	39

List of Tables

Table 1: Previously Identified Historic Resources	7
Table 2: Multiple Property Documentation Forms	12
Table 3: Properties in the APE Requiring Determination of Eligibility Evaluation.....	12
Table 4: Noise Receptors for Historic Properties.....	18
Table 5: Recorded Archaeological Sites within One-Quarter Mile of the APE	21

1.0 Introduction

1.1 Proposed Action Overview

The District Department of Transportation (DDOT), in conjunction with the Federal Highway Administration (FHWA), prepared this Section 106 evaluation to support Final Environmental Assessment (EA) for the proposed Benning Road and Bridges Transportation Improvements project (the proposed action) in northeast Washington, DC. The proposed action would: provide safety improvements; extend the H/Benning Streetcar service to the Benning Road Metrorail Station; and improve pedestrian and bicycle facilities along Benning Road between Oklahoma Avenue and the Benning Road Metrorail Station. FHWA is the lead federal agency for the EA, with DDOT (the Applicant) as the local sponsor. The Federal Transit Administration (FTA), the National Capital Planning Commission (NCPC), and the National Park Service (NPS) are cooperating agencies.

The proposed action requires FHWA approval to allow DDOT to use Federal Aid Route Right-of-Way (ROW) funds for streetcar operations on Benning Road. FHWA concurred with mass transit use of the Benning Road ROW in a letter to DDOT dated April 18, 2013. The proposed action is included in the National Capital Region Transportation Planning Board's adopted *Transportation Improvement Program (TIP)* and the 2016 *Financially Constrained Long-Range Plan for the National Capital Region (CLRP)*.

This EA is a Federal document and was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations (40 CFR 1500-1508), FHWA's *Environmental Impact and Related Procedures* (23 CFR 771), FHWA's *Technical Advisory Guidance for Preparing and Processing Environmental and Section 4(f) Documents* (T6640.8A), FHWA's 2006 *SAFETEA-LU Environmental Review Process: Final Guidance*, Appendix A of 23 CFR part 450 titled *Linking Transportation Planning and NEPA Processes*, FTA's 2006 *Transit Noise and Vibration Impact Assessment* guidance, FHWA's *Noise Regulations* (23 CFR 772), and DDOT's *Environmental Process Manual*.

As the proposed action uses federal aid funds, the National Historic Preservation Act (NHPA) is applicable. This *Section 106 Technical Memorandum* supports the EA and was prepared to document the historic properties and archaeological resources in the Benning Road corridor and to document the assessment of effects of the proposed action on these properties or resources. These assessments are consistent with Section 106 of the National Historic Preservation Act (16 U.S.C. §470) and its implementing regulations (36 CFR 800).

1.2 Description of Proposed Action- Area of Potential Effects

The portion of Benning Road that is the subject of the EA is the northeast section of Washington, DC and is approximately two miles long. The western terminus for the proposed action is the intersection of Benning Road and Oklahoma Avenue. The eastern terminus is the Benning Road Metrorail Station. Area of potential effect (APE) was identified for the purposes of this Section 106

Benning Road and Bridges Transportation Improvements Environmental Assessment

Technical Memorandum using the methodology described in **Section 2**. The APEs are shown in **Figure 1**. The APE for historic properties primarily includes residential areas with retail and business activity around the intersection of Benning Road and Minnesota Avenue. The APE for historic properties also includes portions of Langston Golf Course and Fort Mahan Park. Within each APE, Benning Road crosses the Anacostia River, Kingman and Heritage Islands Park, DC-295, and the Metrorail and CSX Railroad tracks.

Benning Road is a principal arterial that carries 26,000 annual average daily traffic (AADT). It carries four lanes of traffic in each direction between Oklahoma Avenue and 36th Street, and two through lanes of traffic in each direction between 26th Street and the Benning Road Metrorail Station. The Benning Road APEs are adjacent to and just east of the H/Benning Streetcar Line. The APE for historic properties includes two Metrorail stations: Benning Road and Minnesota Avenue. The intersection of Benning Road and Minnesota Avenue has a high volume of pedestrian and motor vehicle activity. This intersection provides safety challenges and has been continually listed as one of the top five intersections that record both high crash rates and crash frequency within the District. The *Traffic Accident Reporting and Analysis System 2* shows that the intersection of Benning Road and Minnesota Avenue recorded 202 crashes from 2016 to 2018, with 60 of those crashes resulting in injuries.

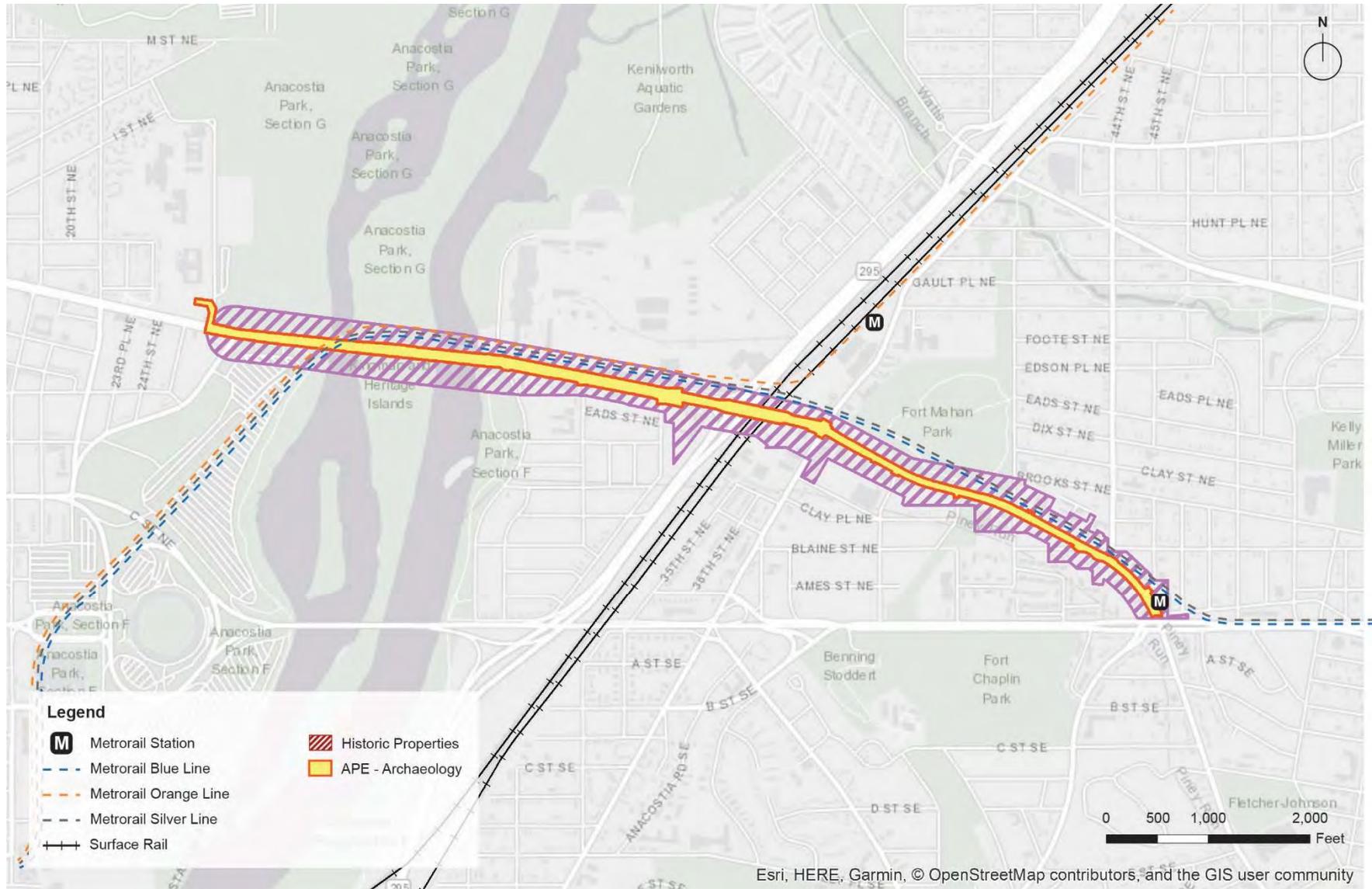
The two bridges crossing DC-295 and CSX Railroad tracks in the APEs provide both structural and functional challenges. These bridges need repair or rehabilitation, and lack adequate sidewalks. Existing transit services along Benning Road are well-used and crowded. This portion of Benning Road has been part of several studies and plans in the past including the *DC Transit Future System Plan* (2010), *Benning Road Streetcar Extension Feasibility Study* (2013) and *Benning Road Corridor Redevelopment Framework Plan* (2008). The need to improve the Benning Road corridor to safely and efficiently accommodate all modes of transportation is a recurring theme in previous planning studies. The purpose of the proposed action is to address deficiencies in transportation infrastructure conditions, improve safety conditions and operations for both motorized and non-motorized access, and to provide for increased mobility and accessibility between the intersection of Benning Road and Oklahoma Avenue and the Benning Road Metrorail Station.

1.3 Purpose of Report

The purpose of this report is to provide an evaluation of historic properties and archaeological resources in the APEs under Section 106 of the National Historic Preservation Act (NHPA) of 1966. DDOT informally initiated Section 106 consultation with the District of Columbia State Historic Preservation Office (DC SHPO) in March 2014 and the FHWA formally initiated consultation in March of 2015 (Appendix A). During the period of initial consultation between DDOT and the DC SHPO, the APEs were established (see **Figure 1**) and the properties that required evaluation for their eligibility for inclusion in the National Register of Historic Places (NRHP) were identified. During consultation between DDOT and DC SHPO, it was agreed that 29 properties in the APE for historic properties required a determination of NRHP eligibility. Additionally, it was acknowledged that six properties in the APE have previously been listed in or have been determined eligible for listing in the NRHP.

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 1: Project APEs for Historic Properties and Archaeology



Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Regarding archaeological resources, preliminary research resulted in the identification of previously recorded archaeological sites within one-quarter mile of the APE. The two build alternatives were determined occurring primarily within the previously disturbed land of DDOT's right-of-way. As a result, FHWA, DDOT and the DC SHPO previously agreed to defer an archaeological survey until the proposed locations and dimensions of project-related ground disturbances are refined. With the continued coordination and selection of Preferred Alternative, it was determined that no new ground disturbance would be needed as a part of the proposed project. Therefore, no adverse impacts to the archeological resources are anticipated. FHWA and DDOT will continue to consult with DC SHPO throughout the final design and construction of the proposed project.

1.4 Selection of DDOT's Preferred Alternative

The Draft EA was released for a 30-day public comment period on May 4, 2016 and a public hearing was held on May 19, 2016. The public and agencies were given the opportunity to review and comment on the EA until June 2, 2016. Public and agency coordination efforts have continued since the Draft EA and public hearing. DDOT held an Open House for the EA on November 15, 2017. After thorough consideration of input received from the public and agencies after publication of the Draft EA and based on technical analyses and the evaluation of alternatives, DDOT has selected Build Alternative 2-Median Streetcar Alignment with wired propulsion as the Preferred Alternative.

2.0 Identification of Historic Properties

2.1 Methodology

Under 36 CFR 800.16(d), APEs for historic properties and for archaeology were defined for each Build Alternative in 2014. An APE is "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist." Development of the APEs took into consideration the potential for effects from construction and operational activities related to the proposed action. The APE for archaeological resources was defined as the proposed action limits of disturbance (LOD) under the current conceptual design; the APE for historic properties includes the archaeological APE as well as areas within visible and/or audible range of the LOD. The DC SHPO concurred on the APEs in 2014. The APEs may be modified in the future to accommodate additional impact areas (such as construction lay-down areas) not defined in the current design.

Historic properties and archaeological sites within the APEs were identified according to two criteria:

- current listing on the NHRP, and properties previously determined eligible for listing in the NRHP; and
- meeting the criteria for listing in NRHP but not previously listed or determined eligible.

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Properties listed in the District of Columbia Inventory of Historic Sites (DCIHS) are considered to meet NRHP eligibility criteria and, thus, are historic properties. Research and an historic properties survey were conducted in the APE to identify historic properties; research only was completed for archaeological sites. The background research effort consisted of internet research of local newspaper articles, library research at Kiplinger Research Library of the Historical Society of Washington, DC, and the Washingtonian collection at the Martin Luther King, Jr. Library, analysis of historic maps and aerial photographs, nominations for sites listed in the NRHP and DCIHS, the DC Office of Planning online mapping of historic sites, and previous studies in the proposed action vicinity.

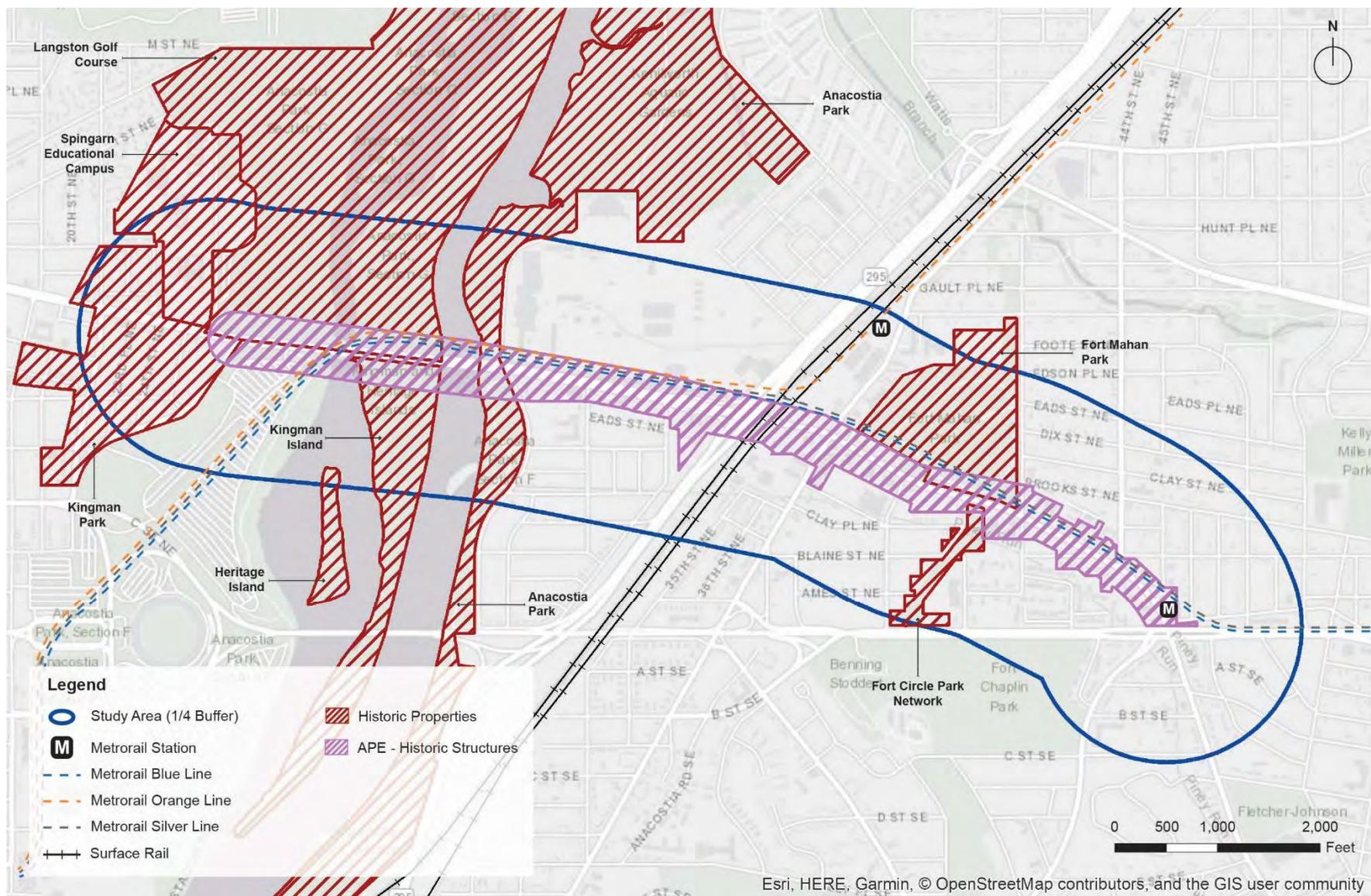
The historic property survey was conducted between August and October 2014. The purpose of the survey was to collect enough data and photographs to evaluate the historical integrity of each of the 29 properties identified in consultation with the DC SHPO as requiring determinations of NRHP eligibility. The historic properties survey was completed in accordance with federal and local laws and regulations, including Section 106 of the NHPA by professional architectural historians meeting the Secretary of Interior's standards (36 CFR 61). Information gathered during the background research and field survey was used to prepare a DC SHPO Determination of Eligibility Form for each property.

2.2 Previously Identified Historic Properties

Seven previously identified historic properties are within the APE. Two NPS parks are listed in the NRHP: Civil War Defenses of Washington (Fort Mahan and Fort Circle Parks) and the Langston Golf Course Historic District. NPS and DC SHPO consider Anacostia Park (which includes Kingman and Heritage Islands Park) to be eligible for listing in the NRHP and the DCIHS. The Browne, Phelps, Spingarn, and Young Educational Campus Historic District at 2500 Benning Road is listed in the NRHP and DCIHS; the Spingarn Senior High School is also individually listed. In 2018, Kingman Park became the area's newest NRHP-listed historic district. Its boundary includes the Langston Golf Course and the Browne, Phelps, Spingarn, and Young Educational Campus Historic District. The entrance pavilion and marquee of the former Senator Theater on Minnesota Avenue, south of Benning Road is listed in the DCIHS; however, the auditorium itself has been demolished. These properties are summarized in **Table 1** below and shown in **Figure 2**, **Figure 3** and through **Figure 11** illustrate these properties.

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 2: Previously Identified Historic Properties



Sources: DC SHPO; DC Inventory of Historic Sites and Pending Historic Landmark and Historic District Nominations; National Capital Parks – East, Environmental Assessment.

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Table 1: Previously Identified Historic Resources

Property Name	Designation	Status	NRHP#
Civil War Defenses of Washington	NRHP	Listed	74000274
Langston Golf Course Historic District	NRHP	Listed	19911015
Anacostia Park	NRHP DCIHS	Eligible Listed	n/a
Senator Theater Entrance Pavilion	DCIHS	Listed	n/a
Spingarn School	NRHP DCIHS	Listed Listed	14000198
Browne, Phelps, Spingarn, and Young Educational Campus Historic District	NRHP DCIHS	Listed Listed	15000743
Apartment Buildings of Washington DC 1870-1945	NRHP	Listed	64500083
Kingman Park Historic District	NRHP DCIHS	Listed Listed	100002960

Sources: District of Columbia, Historic Preservation Office; DC Inventory of Historic Sites and Pending Historic Landmark and Historic District Nominations; National Capital Parks – East, Environmental Assessment, Anacostia Riverwalk Trail Section 3 Realignment, Anacostia Park; National Park Service, National Register of Historic Places Database and Research Page.

Figure 3: Civil War Defenses of Washington - Fort Mahan Park

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 4: Civil War Defenses of Washington – Fort Circle Park



Figure 5: Langston Golf Course

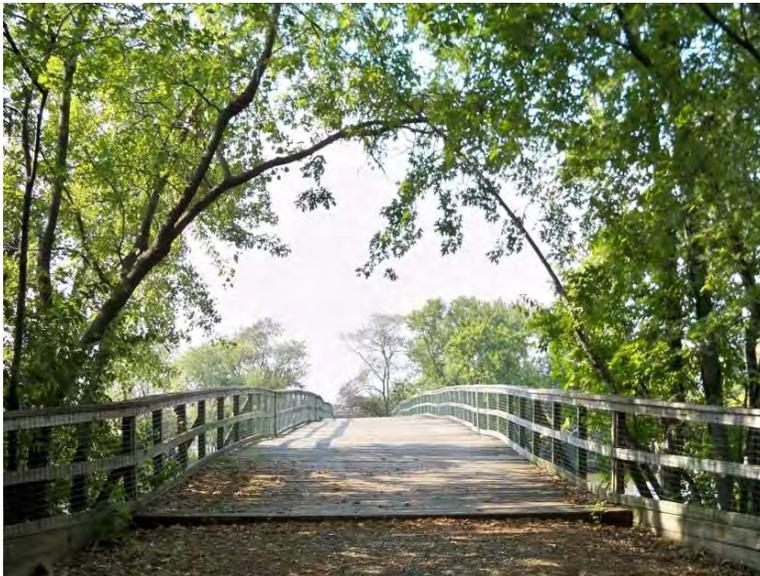


Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 6: Anacostia Park, footbridges to Kingman and Heritage Islands



Figure 7: Kingman Island – Bridge to Heritage Island Park



Source: www.kingmanisland.org

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 8: Spingarn School



Figure 9: Browne School



Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 10: Young School



Figure 11: Kingman Park Historic District – 23rd Place



Sources: Kingman Park Historic District Design Guidelines, DC Historic Preservation Board

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

NRHP Multiple Property Listings

NRHP Multiple Property Listings record groups of thematically related properties that are historically significant. This type of NRHP listing defines and describes one or more historic contexts, associated property types related to the historic context(s) and establishes significance and integrity requirements for nominating properties to the National Register. This type of NRHP listing is established through a Multiple Property Documentation Form (MPDF). Apartment buildings within the APE, may meet the criteria for the previously approved “Apartment Buildings of Washington DC 1870-1945” MPDF.

Table 2: Multiple Property Documentation Forms

Resource Name	Designation	Status	NRHP#
Apartment Buildings of Washington DC 1870-1945	NRHP	Listed	64500083

Source: National Park Service, National Register of Historic Places Database and Research Page, <http://www.nps.gov/nr/research/>.

2.3 Potentially Eligible Historic Properties

In letters dated March 25, 2014 and August 20, 2014, the DC SHPO identified an additional 29 properties in the APE that warrant a determination of eligibility evaluation for listing on the NRHP (see **Figure 12**). Recommendations of NRHP eligibility of these properties have been formulated. The DC SHPO concurred with these recommendations on April 15, 2015 (Appendix A). Overall, 11 of the 29 properties were determined to be eligible for listing on the NRHP. Photographs of the eleven resources are provided in **Figure 13** through **Figure 15**.

Table 3: Properties in the APE Requiring Determination of Eligibility Evaluation

Ref. No.	Address	Description	Recommended NRHP Status
1	Benning Rd	Fire and Police Call Boxes	Eligible
2	3300 Benning Rd	Pepco Power Plant, 1906 (most of plant demolished, this structure remains standing)	Eligible
3	3341 Benning Rd	1948 commercial building obscured by large c. 1990 addition	Not Eligible
4	3399 Benning Rd	Mid-20 th -century auto sales and service building, now D&C Cab	Not Eligible
5	3423-39 Benning Rd	River Terrace Shopping Complex, c. 1940, designed by George T. Santmyers. Not individually eligible but contributes to a potential River Terrace Historic District.	Not Eligible
6	3445 Benning Rd	19 th -century house, now “Benning Liquors;” substantially altered	Not Eligible
7	Vicinity of 3700 Benning Rd	Baltimore & Potomac Railroad	Eligible

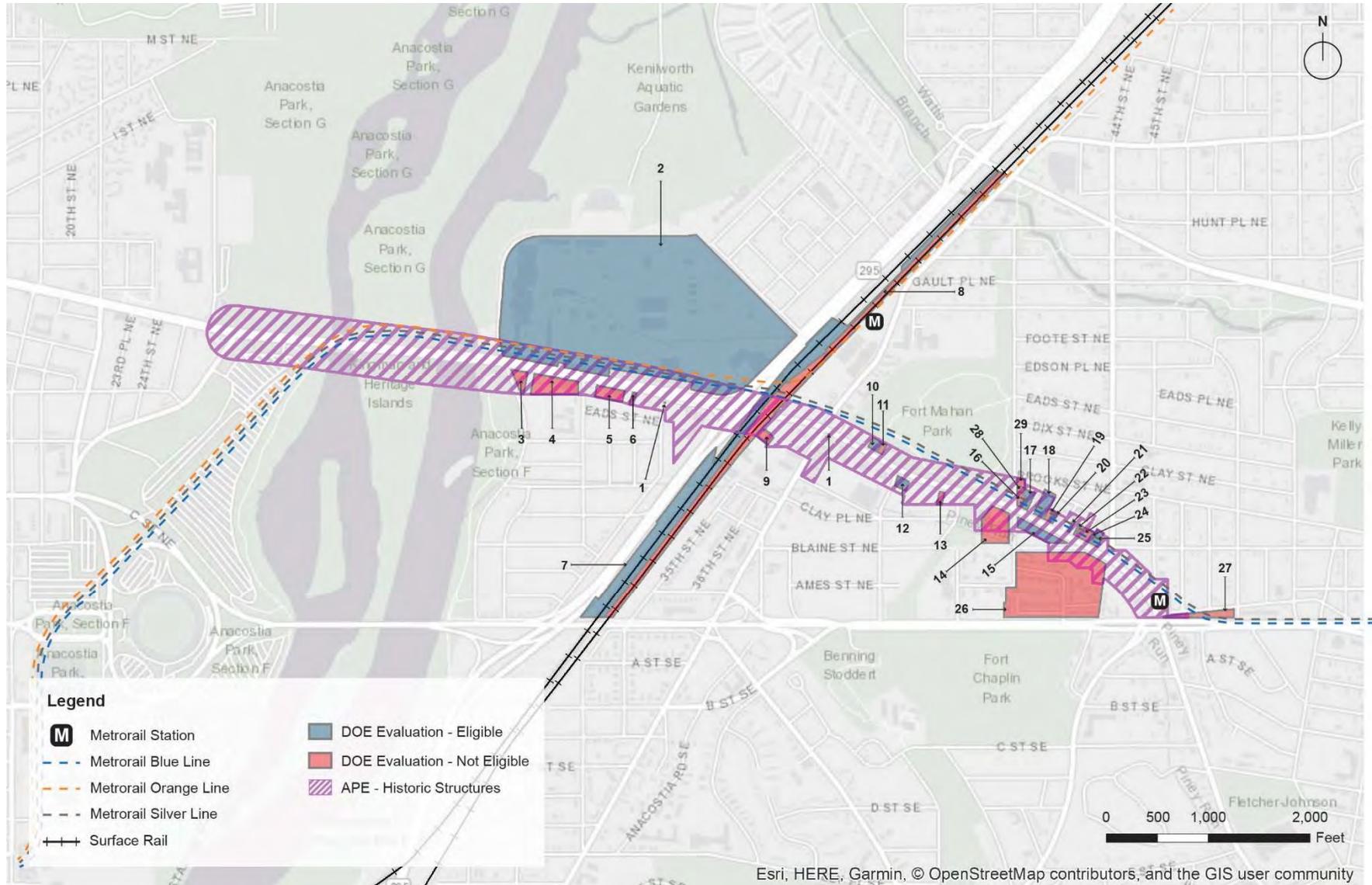
Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Ref. No.	Address	Description	Recommended NRHP Status
8	Vicinity of 3700 Benning Rd	Baltimore & Ohio Railroad, Alexandria Branch	Not Eligible
9	3701 Benning Rd	A. Loffler Provision Co., 1916. Adjacent to the principal slaughterhouse and livestock facility for DC.	Not Eligible
10	3938 Benning Rd	1931 residence designed by African-American Architect Lewis Giles	Eligible
11	3940 Benning Rd	1940 Colonial Revival residence designed by African-American Architect Gus Bull	Not Eligible
12	4001 Benning Rd	Stewart Funeral Home, 1964. Designed by Donald H. Roberts for an African-American family-owned and	Eligible
13	4053 Benning Road	c. 1930 residence	Not Eligible
14	4145 Benning Rd	No. 14 Police Precinct, 1948; Metropolitan Police Department Sixth District Headquarters, 1978 extension	Not Eligible
15	4201-4243 Benning Rd	Block of row houses, c. 1940	Eligible
16	4202 Benning Rd	Commercial building, now Mike's Market	Not Eligible
17	4208 Benning Rd	Designed by African-American architect Cyril Bow in 1939. Eligible under "Apartment Buildings in Washington	Eligible
18	4228 Benning Rd	1945-46 apartment building designed by African-American Architect R. C. Archer	Eligible
19	4234 Benning Rd	c. 1930 residence	Not Eligible
20	4236 Benning Rd	1941 apartment building designed by African-American Architect Cyril Bow. Eligible under "Apartment	Eligible
21	4248 Benning Rd	Commercial building, now Jamahri's Hair Studio	Not Eligible
22	4254 Benning Rd	c. 1930 residence	Not Eligible
23	4256-4264 Benning Rd	c. 1950 apartment buildings	Not Eligible
24	4270 Benning Rd	Jones Memorial Methodist Episcopal Church, now New Mount Calvary Baptist Church, designed by Woodson &	Eligible
25	4274 Benning Rd	1942 apartment building designed by George T. Santmyers. Eligible under "Apartment Buildings in	Eligible
26	4212 East Capitol St	Fort Chaplin Park Apartments & Townhomes	Not Eligible
27	4510 East Capitol Street	The "Shrimp Boat," take-out restaurant, constructed c. 1953	Not Eligible
28	217-223 42 nd St	Mid-20 th -century duplexes	Not Eligible
29	227 and 231 42 nd St	Mid-20 th -century apartments, currently a pre-school	Not Eligible

Sources: DC SHPO

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 12: Properties Assessed for Listing Eligibility on the NHRP



Sources: DCGIS

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 13: NHRP Eligible Resources (Group I)



Figure Key

- A. Fire and Police Call Boxes
- B. PEPCO Power Plant
- C. Baltimore & Potomac Railroad
- D. 3938 Benning Rd

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 14: NHRP Eligible Resources (Group II)



E



G



F



H

Figure Key

E. Stewart Funeral Home (4001 Benning Rd)

F. 4208 Benning Rd

G. Row House Block, 4201-4243 Benning Rd

H. 4228 Benning Road

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 15: NHRP Eligible Resources (Group III)



Figure Key

I. 4236 Benning Rd

J. New Mount
Calvary Baptist
Church (4270
Benning Rd)

K. 4228 Benning
Road



Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

The noise analysis conducted for this project describes the current and future noise conditions predicted to exist at seven of the eight previous listed historic properties, as well as at eight of the 11 properties determined to be eligible for listing in the NHRP. The Senator Theater Entrance is the NHRP listed property that was not included in the analysis. The property was excluded from the analysis based on its distance from Benning Road. The three NHRP eligible properties that were not include in the analysis are: the Fire and Police Call Boxes; the PEPCO facility at 3300 Benning Rd; and the section of the Baltimore & Potomac Railroad located in the vicinity of 3700 Benning Rd. The call boxes and Railroad were excluded because they are elements of transportation facilities that are themselves sources of noise and therefore considered non-noise sensitive. The PEPCO facility was excluded because it is an industrial site that is itself a source of noise and therefore considered non-noise sensitive. **Figure 16** illustrates the placement of the 14 noise receptors used in the noise analysis, and **Table 4** identifies the receptors used to assess each property.

Table 4: Noise Receptors for Historic Properties

Ref No.	Name / Address	Representative Noise Receptor	FHWA Activity Category	FTA Land Use Category
-	Civil War Defenses of Washington (Fort Mahan)	M6	C	3
-	Civil War Defenses of Washington (Fort Circle)	M8	C	3
-	Langston Golf Course Historic District	M2	C	3
-	Anacostia Park	M4	C	3
-	Senator Theater Entrance Pavilion ¹	-	D	3
-	Spingarn School	M1	C	3
-	Browne, Phelps, Spingarn, and Young Educational Campus Historic District	M1	C	3
-	Kingman Park Historic District	M1	B	2
1	Fire and Police Call Boxes, Benning Rd ²	-	F ³	-
2	3300 Benning Rd ³	-	F ³	-
7	Vicinity of 3700 Benning Rd ³	-	F ³	-
10	3938 Benning Rd	M6	B	2
12	4001 Benning Rd	M7	C	3
15	4201-4243 Benning Rd	M9	B	2
17	4208 Benning Rd	M9	B	2
18	4228 Benning Rd	M10	B	2
20	4236 Benning Rd	M10	B	2
24	4270 Benning Rd	M11	C	3
25	4274 Benning Rd	M11	B	2

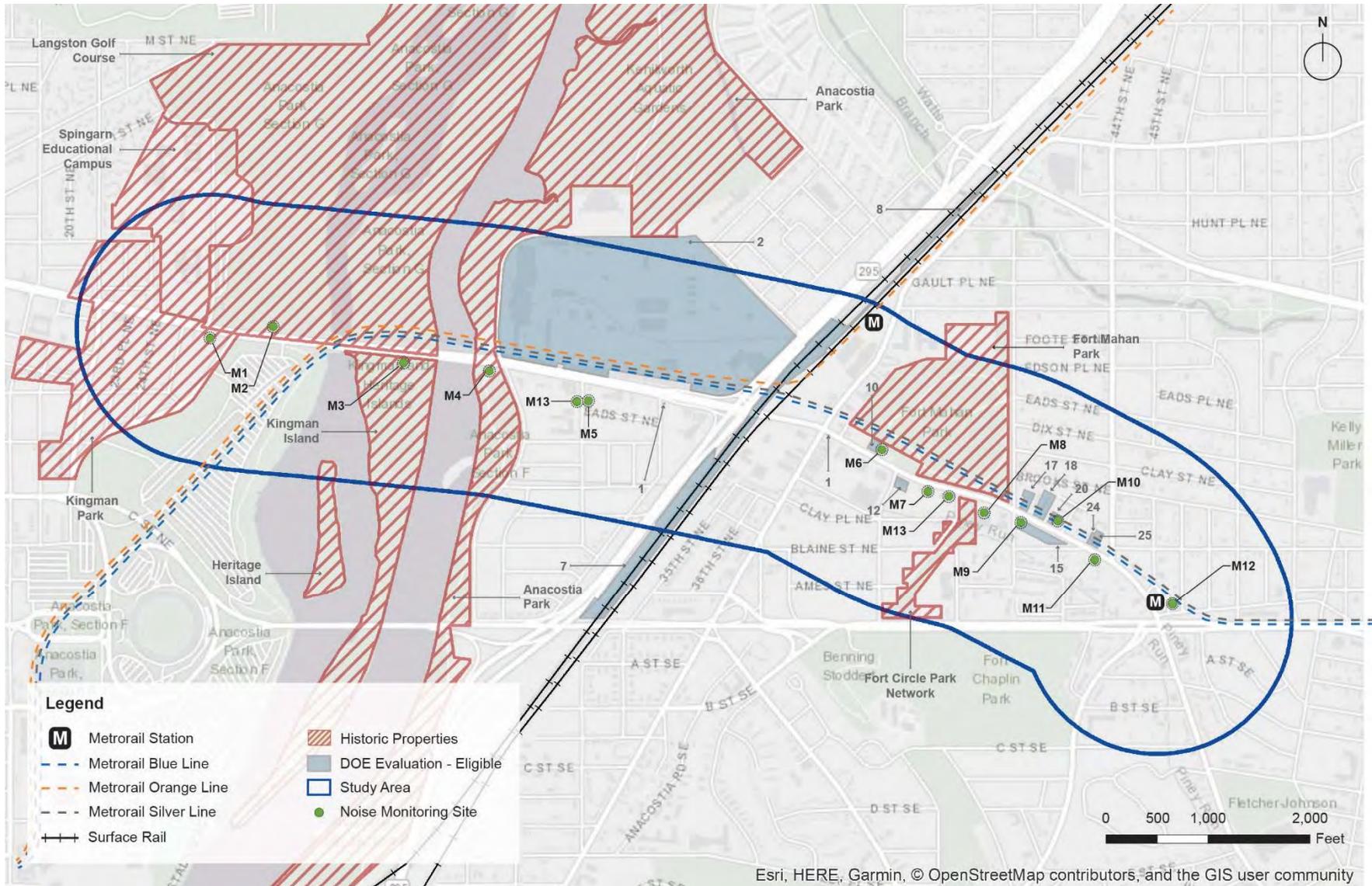
¹ This property was excluded from the analysis of noise impacts due to its setback from Benning Road

² These properties were excluded from the analysis because they are considered to be non-noise sensitive

³ Category F properties are considered not to be noise sensitive, and therefore are not eligible for abatement consideration

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 16: Historic Properties and Noise Monitoring Sites



2.4 Potential Archaeological Resources

The Anacostia River floodplain and adjacent upland bluffs were favorable for human occupation throughout the prehistoric, contact, and historic periods. Given the topographic setting of the APE and historic activities carried out in the vicinity, the area of the APE would have had high prehistoric and historic archaeological potential prior to the extensive landfilling of the turn of the 20th century.

Numerous archaeological surveys have been conducted within one-quarter mile of the APE, several which intersect or are immediately adjacent to the APE. Those surveys, as well as professional and/or avocational archaeologists canvassing the area since the late nineteenth century, have reported thirteen archaeological sites within one-quarter mile of the APE (**Table 5**). Four of the 13 sites are reported to be present within or adjacent to the APE but given the imprecision of site recordation over the past 100+ years, their presence within the APE requires archaeological confirmation. The results of the preliminary assessment of the potential for archaeological resources in the APE are summarized as follows:

- The western portion of the APE around Anacostia Park, includes Kingman Island and Heritage Island. This area appears to be the least disturbed portion of the APE. However, historic documents indicate that the area around the Anacostia River was substantially modified by an early-twentieth-century program of dredging, channelization, wetland-reclamation, and island-building that created both islands and Kingman Lake. Archaeological materials predating the early-twentieth century may be present at these locations beneath a package of historic fill material of variable but sometimes substantial thickness (re. Wagner 2015).
- Within the existing right-of-way of the Benning Road and Minnesota Avenue, no intact archaeological deposits are anticipated because the area has been subject to decades of utility, roadway and transit infrastructure construction and maintenance activities that have disturbed surface and subsoils (e.g. installation and resurfacing). The most disruptive and well-documented impact to naturally occurring land surfaces within the APE for archaeology resulted from construction of WMATA's Blue Line in the mid-1970s. As shown in **Figure 17**, the alignment of the Blue Line encompasses the APE for archaeology from a point west of 42nd Street to the eastern end of the APE. The subway was constructed using the cut-and-cover method. Consequently, no intact archaeological deposits are expected to occur in this section of the APE.
- Fort Mahan area — There is a potential for intact archaeological resources dating to the late-nineteenth through early twentieth-centuries or earlier in the Fort Mahan Park area. Areas adjacent to Fort Mahan Park, a Civil-War era fort, were constructed for the defense of Washington, DC and listed in the NRHP as part of the Civil War Defenses of Washington District. Fort Mahan Park itself is protected by the NPS and the area surrounding the park is heavily disturbed due to roadway, residential and business developments. Therefore, no intact archaeological deposits are expected to occur in this section of the APE.

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Table 5: Recorded Archaeological Sites within One-Quarter Mile of the APE

Site #	Location	Report #	Site Name	Project	Site Type	NRHP Status	Time Period
51NE008	East Bank of Anacostia above Benning Bridge	203	BP15		P	Not evaluated	2 paleo points; Unidentified (UID) prehistoric
51NE009*	River Terrace Playground, BP 16. NW of school	581	River Terrace; BP16	River Terrace School Expansion	P	Eligible under D	Late Archaic, Early and Middle Woodland
51NE010	East of Anacostia River; between Anacostia Ave & 34 th Star Blaine	203	BP17?		HP	Not evaluated	UID prehistoric; Contact; Not relocated.
51NE013*	East bank of Anacostia River; South of Benning Bridge				P	Not evaluated	UID prehistoric. Not relocated.
51NE015*	East of Anacostia; South of Benning Bridge		S34; S47; S33		P	Not evaluated	Woodland and UID prehistoric; Not relocated.
51NE018	South of Benning Rd, 300 yds from PEPCO Power House		S341		P	Not evaluated	Early, Middle, Late Woodland, and UID prehistoric; Not relocated.
51NE023	1100 ft northwest of Benning/ Kenilworth intersection PEPCO Railroad spurs	203	PE 242-312?	WSSC Force Main	P	Not evaluated	UID prehistoric. Not relocated.
51NE025	Intersection of Kenilworth and Benning	150		Barney, Circle Phase I & II	P	Not eligible	UID prehistoric
51NE036	Sq. 5053, portion lot 38, Minnesota Ave. adjacent to Metro Station	274	DC DOES	Phase 1 DC DOES	HP	Not eligible. Destroyed by construction	UID prehistoric and domestic/ farm/ church/ school

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

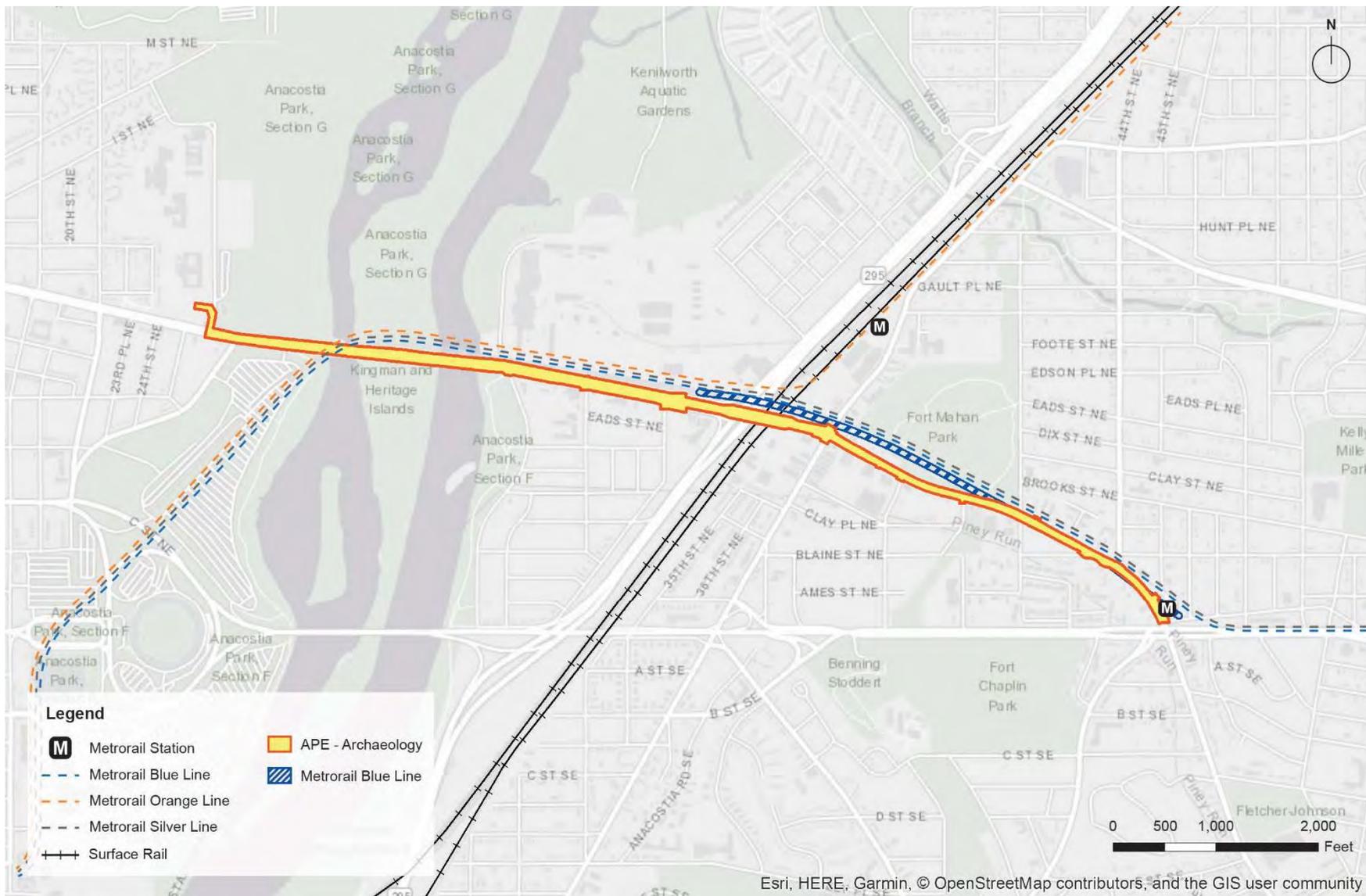
Site #	Location	Report #	Site Name	Project	Site Type	NRHP Status	Time Period
GWU5	Prehistoric secondary deposit in fill, no site # given	203	GWU5	WSSC Force Maine	P	Not a site	Secondary deposit of prehistoric (mixed age) in fill
H101*	In the vicinity of Benning Rd and Anacostia Ave		Benning's Bridge Battery		Civil War	Not relocated	
P29	SI 243 Cat 155082 Scagg Far; originally lumped w/ 51NE17	203	Scagg Farm	PRAS	P	Not relocated, unevaluated	Woodland; UID prehistoric ceramics
51NE050*	4000 Benning Rd	627		HUD – Multi-Family Housing	H	Not eligible	Early 20 th century industrial

Source: DCHPO 2016.

*Reported within or adjacent to the APE.

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 17: Areas of Recorded Disturbances in the APE



3.0 Impacts to Historic Properties and Archaeological Resources

3.1 Methodology

Impacts to historic properties and archaeological resources are described in terms of type, context, duration, and intensity, which is consistent with CEQ regulations that implement NEPA. These impact analyses are intended, however, to comply with the requirements of both NEPA and Section 106 of the National Historic Preservation Act (NHPA) of 1966. In accordance with the Advisory Council on Historic Preservation (ACHP) regulations implementing Section 106 (36 CFR Part 800, Protection of Historic Properties), impacts to historic properties and archaeological resources were identified and evaluated by:

- 1) determining the APE;
- 2) identifying historic properties and archaeological resources present in the APE that are either listed in or eligible to be listed in the NRHP;
- 3) applying the criteria of adverse effect to affected historic properties and archaeological resources either listed in or eligible to be listed in the NRHP; and
- 4) considering ways to avoid, minimize, or mitigate adverse effects.

Under the ACHP's regulations, a determination of either adverse effect or no adverse effect must be made for affected NRHP listed or eligible historic properties and archaeological resources. An adverse effect occurs whenever an impact alters, directly or indirectly, any characteristic of a historic properties and archaeological resources that qualifies it for inclusion in the NRHP (e.g., diminishing the integrity of the resource's location, design, setting, materials, workmanship, feeling, or association). Adverse effects also include reasonably foreseeable effects caused by a proposed action that would occur later in time, be farther removed in distance, or be cumulative (36 CFR 800.5, Assessment of Adverse Effects). Adverse effects on historic properties and archaeological resources would include, but not be limited to:

- 1) Physical destruction, damage, or alteration of all or part of the property;
- 2) Isolation of the property from or alteration of the character of the property's setting when that character contributes to the property's qualification for the NRHP;
- 3) Introduction of visual, audible, or atmospheric elements that are out of character with the property or alter its setting;
- 4) Neglect of a property resulting in its deterioration or destruction; and
- 5) Transfer, lease, or sale of the property (36 CFR 800.9[b]).

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

A determination of no adverse effect means that historic properties and archaeological resources are present, but the effect would not diminish in any way the characteristics of the property or resource that qualify it for inclusion in the NRHP.

For the purposes of this *Section 106 Technical Memorandum*, a significant impact under NEPA is defined as an “unresolvable” adverse effect under Section 106 of the NHPA. “Unresolvable” adverse effects may occur when the terms of mitigation cannot be agreed upon, or if the NHPA Section 106 process is foreclosed due to an inability to reach agreement.

The effects of the proposed action on historic properties and archaeological resources in the APE are described below. As stated above, an adverse effect on a property or resource would result if the proposed action impacts the integrity or character of that property or resource. The activities that cause impacts on historic properties and archaeological resources are typically associated with the construction of a proposed action, including: disturbance of the ground, the material or physical alteration of the built environment, or the alteration of the visual setting. Construction activities may cause impacts on historic properties and archaeological resources and can include excavation, staging, heavy equipment usage and movement, drilling, demolition, or relocation, as well as increases in noise or vibration levels, or introduction of new visual elements.

Common adverse effects or changes to a historic property are visual intrusions, construction and operational noise and vibration. A change in the visual setting of an historic property through the introduction of new features to the landscape or removal of existing ones, can impact the significance of that property. Vibration from impact pile-driving during construction could cause the physical destruction, damage, or alteration of an historic property if the pile-driving is within 25 to 50 feet of the property. Construction noise also has the potential to cause adverse effects or substantial adverse change to an historic property. An historic property that is sensitive to noise includes such properties as residences, parks, libraries, museums, and schools. These types of properties have an inherent quiet nature that is part of their identification as well as their significance.

Soil excavation or compaction resulting from the use of heavy machinery on the construction site or in staging areas may affect the integrity of artifact-bearing deposits associated with known or as-yet undiscovered archaeological resources. Unrecorded archaeological resources may exist in portions of the APE for archaeology. Disturbance and removal of archaeological resources could result in effects on archaeological resources under Section 106.

An Architectural Historian qualified under the Secretary of the Interior’s Professional Qualification Standards (36 CFR part 61) conducted the assessment of the potential of the proposed action elements to affect historic properties within the APE. An Archaeologist performed the same assessment for archaeological resources.

3.2 Assessment of Effects

3.2.1 No Build Alternative

Under the No Build Alternative, existing conditions would remain unchanged. Historic properties and archaeological resources would not be affected as no excavation, demolition, or construction would occur on or near the properties or resources.

3.2.2 Build Alternative 1 – Curbside Alignment

Safety improvements at the intersection of Benning Road and Minnesota Avenue would require relocation of an historic fire call box in the southeast corner of the intersection because of minor widening to accommodate a left-turning lane. Build Alternative 1 would not impact the historic fire and call boxes at the Benning Road and 36th Street intersection. DDOT will relocate the Minnesota Avenue fire call box to a comparable position at the new roadway edge in the southeast corner. As the proposed relocation would not diminish the integrity of the fire call box or its setting, a preliminary determination of no adverse effect to the fire call box is made.

The proposed improvements on Benning Road between Oklahoma Avenue and the western bank of the Anacostia River, occur within the boundaries of the Kingman Park Historic District. In the District's NCHRP nomination form, Benning Road is discussed several times as an important feature of Kingman Park's development. The existence of streetcar service along Benning Road (and mobility itself) is a key component of this relationship. By reintroducing streetcar service along the corridor, Build Alternative 1's proposed roadway improvements within the boundaries of the Kingman Park Historic District are therefore considered to be consistent with the District's historical context.

The proposed action would modify the Benning Road typical section, which would introduce new visual elements to the study area (new roadway typical section, streetcar operations, stop platforms, wired propulsion, traction powered substations (TPSS) and DC Streetcar Car Barn Training Center connecting track). Build Alternative 1 would also require removal of the street trees along Benning Road to accommodate the proposed roadway typical section. A key element in that change is the wider roadway section adjacent to historic properties aligned along Benning Road. A second key element is the new streetcar operation along Benning Road (track, stops, and vehicles); the third key element is the propulsion system for that streetcar (wired and wireless options). Each element would be located on or near the outside lane areas of the roadway section. **Figure 18** through **Figure 23** are renderings of Build Alternative 1 showing the wired and wireless propulsion systems. **Figure 24** shows the existing stop platform design at Union Station; DDOT would apply a similar design and elements at the proposed stops. The assessment of potential effect of Build Alternative 1 on historic properties determined that none would be adversely affected. While each element would be a new visual element in the context of the historic properties, the new elements are not inconsistent with the existing and historic transportation – focused visual elements in the APE.

Specifically, Benning Road pre-dates the historic properties, apart from the fort component of Fort Mahan Park (an archaeological resource). Historic properties, such as the apartment and commercial buildings, are oriented to the roadway. A streetcar historically ran along the portion

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

of Benning Road in the APE from the west side of the Anacostia River to Kenilworth Avenue. The presence of this line was a positive selling point for the developers of River Terrace and provided mass transit access to the Benning Road area and north to the Deanwood neighborhood. Introduction of a new streetcar service would be consistent with the historical presence of streetcar transit in the APE. The focus of activities at other historic properties, such as the Langston Golf Course, Anacostia Park, and the Civil War Defenses of Washington, are internal to the properties. The elements of the proposed action would be peripheral to these focal points.

The development of Build Alternative 1 would require the acquisition of temporary easements from Kingman and Heritage Island Park, Anacostia Park, the Baltimore & Potomac Railroad, the PEPCO powerplant. These temporary easements would be needed to install temporary fencing, erosion and sediment control measures, and provide adequate space for construction activities. In the B&P Railroad corridor, the easements will extend approximately 30' from the perimeter of the Whitlock Bridge. The principal construction activity in this area will be demolition and reconstruction of the Whitlock Bridge. In Anacostia Park, Kingman Park, and the PEPCO powerplant, the easements will extend approximately 5' south from the existing edge of sidewalk. The principal construction activity in these areas will be sidewalk reconstruction. Based on the long and extensive of ground disturbance in these areas, no intact archaeological deposits are expected to occur in these sections of the APE.

Based on the scope of the proposed improvements, Build Alternative 1 warrants the consideration of noise impacts under both FHWA and FTA's noise analysis protocols. The results of the both analyses are provided in **Appendix I**, the *Noise and Vibration Technical Memorandum* that was completed for the EA. Using FHWA's criteria, all 15 of the historic properties included in the noise analysis are predicted to experience traffic noise levels above the NAC under both the existing and build conditions and therefore are considered be impacted under DDOT's Noise Policy. However, the traffic noise levels predicted to occur under the build condition for all 15 properties are within one 1 decibel than those currently experienced. Based on this conclusion, the changes in traffic noise volumes generated by the proposed improvements will not be discernable and therefore do not constitute an adverse effect under Section 106 of the Historic Preservation Act.

Using FTA's criteria, five historic properties are predicted to be impacted by the noise generated by streetcar operations. Three of the five properties are expected to experience severe noise impacts under the build condition; these three properties are: Spingarn High School, Kingman Park Historic District, and Browne, Phelps, Spingarn, and Young Educational Campus Historic District. These impacts are associated with: use of the streetcar warning bell, the use of switches, and the occurrence of wheel squeal. These impacts will be mitigated using several noise reduction measures. Detailed specifications for these measures will be defined during final design, and include:

- the installation of "spring frogs," pointless switches, flange-lifters, and similar fixtures which eliminate the gap in the rail and thereby the impulsive or impact noise from the steel wheel striking the rail gap;
- increasing the radius of the track curves, applying flange lubricators to "grease" the contact points between the steel wheels and the steel rail heads, or procuring streetcar

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

vehicles that can operate effectively along tracks with radii less than 100 feet without causing wheel squeal to occur; and

- reducing the intensity of the streetcar warning bell (as safety protocols allow).

The two remaining properties are expected to experience moderate noise impacts under the build condition; these two properties are the apartment building located at 4208 Benning Rd and the block of rowhouses located between 4201 and 4243 Benning Rd. These impacts are associated with the use of the streetcar warning bell. These impacts will be mitigated by reducing the intensity of the streetcar warning bell and shifting the 42nd Street stop to the west side of the intersection. From a cumulative perspective, the noise from future streetcar operations represents only two percent of the noise that will be generated on Benning Road under the build condition. As a result, the overall noise impact is expected to be approximately the same as loudest hour noise levels predicted using FHWA's Traffic Noise Model (TNM). As stated previously, the build condition noise levels predicted by TNM are within 1 decibel of existing noise levels and therefore do not constitute an adverse effect under Section 106 of the Historic Preservation Act.

Figure 18: Oklahoma Avenue to Kingman Island, Build Alternative 1 (wired)



Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 19: Oklahoma Avenue to Kingman Island, Build Alternative 1 (wireless)



Figure 20: Kingman Island to 36th Street, Build Alternative 1 (wired)



Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 21: Kingman Island to 36th Street, Build Alternative 1 (wireless)



Figure 22: Minnesota Avenue to 45th Street, Build Alternative 1 (wired).



Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 23: Minnesota Avenue to 45th Street, Build Alternative 1 (wireless).



Figure 24: Union Station Stop on H Street



Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Vibration levels from streetcar operations along Benning Road in Build Alternative 1 would exceed FTA vibration impact thresholds at three historic properties (4201-4243 Benning Road, 4208 Benning Road and 4274 Benning Road) that are adjacent to Benning Road because of the proximity of the resources to Benning Road. DDOT will implement vibration control measures (such as streetcar speed reductions and ballast mats under the tracks) to reduce or eliminate vibration impacts. Because of this commitment, vibration from streetcar operations in Build Alternative 1 would not alter the vibration setting of the historic properties in the APE to the degree that the properties would no longer be eligible for the NRHP. DDOT has determined that in terms of vibration impacts, Build Alternative 1 would have no adverse effect on each historic property.

3.2.3 Build Alternative 2 – Median Alignment (Preferred Alternative)

As with Build Alternative 1, the proposed safety improvements for the Benning Road and Minnesota Avenue intersection would require the relocation of the fire call box at the southeast corner of the intersection to a new, similar location. As the call box would retain its integrity of location and setting, the preliminary determination of no adverse effect to the property will occur. The development of Build Alternative 2 would introduce the same visual elements as Build 1 and would lead to similar loss of street trees. Build Alternative 2 proposes to locate the proposed streetcar components (track, stops and propulsion system) towards the roadway median. Specifically, each set of components are closer to the center of Benning Road, and therefore farther away from adjacent historic properties, in Build Alternative 2 compared with Build Alternative 1.

Figure 25 through **Figure 30** are renderings of Build Alternative 2 showing the wired and wireless propulsion systems, respectively. As noted in **Section 1.4**, DDOT has selected the wired option as part of its Preferred Alternative. The proposed roadway dimensions would be the same as Build Alternative 1. **Figure 31** and **Figure 32** are renderings of the proposed stop platform design with an integral wall, shelter, and bench. The stop configuration illustrated in these renderings is located to the west of the Benning Road – 42nd Street intersection and was developed to reduce the occurrence of streetcar noise experienced at the rowhouse block located between 4201-4243 Benning Rd. As the elements in Build Alternative 2 would be like those in Build Alternative 1, but located farther inside the roadway section, the preliminary determination of direct and visual effects was determined to have no adverse effect on the APE's historic structures and districts.

The development of Build Alternative 2 would require temporary easements from Kingman and Heritage Island Park, Anacostia Park, the Baltimore & Potomac Railroad, and the PEPCO powerplant. These temporary easements would be needed to install temporary fencing, erosion and sediment control measures, and provide adequate space for construction activities. In the B&P Railroad corridor, the easements will extend approximately 30' from the perimeter of the Whitlock Bridge. Figures depicting the extent of the easements are provided in Appendix B of *Benning Road and Bridges Transportation Improvements Environmental Assessment*. The principal construction activity in this area will be the replacement of the Whitlock Bridge. In Anacostia Park, Kingman Park, and the PEPCO Powerplant, the easements will extend approximately 5' south from the existing edge of sidewalk. The principal construction activity in these areas will be sidewalk reconstruction. Based on the long and extensive ground disturbance in these areas, no intact archaeological deposits are expected to occur in these sections of the APE.

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Based on the scope of the proposed improvements, Build Alternative 2 warrants the consideration of noise impacts under both FHWA and FTA's noise analysis protocols. Both analyses are provided in detail in Appendix I of *Benning Road and Bridges Transportation Improvements Environmental Assessment*. Using FHWA's criteria, all 15 of the historic properties included in the noise analysis are predicted to experience traffic noise levels above the NAC under both the existing and build conditions and therefore are considered to be impacted under DDOT's Noise Policy. However, the traffic noise levels predicted to occur under the build condition for all 15 properties are within one decibel of those currently experienced. Based on this conclusion, the changes in traffic noise volumes generated by the proposed improvements will not be discernable in the Benning Road corridor and therefore; do not constitute an adverse effect under Section 106 of the Historic Preservation Act.

Using FTA's criteria, five historic properties are predicted to be impacted by the noise generated by streetcar operations. Three of the five properties are expected to experience severe noise impacts under the build condition: Spingarn High School, Kingman Park Historic District, and Browne, Phelps, Spingarn, and Young Educational Campus Historic District. The proposed impacts are associated with: use of the streetcar warning bell, the use of track switches, and the occurrence of wheel squeal. These impacts will be mitigated using several noise reduction measures, including:

- the installation of "spring frogs," pointless switches, flange-lifters, and similar fixtures which eliminate the gap in the rail and thereby the impulsive or impact noise from the steel wheel striking the rail gap;
- increasing the radius of the track curves, applying flange lubricators to "grease" the contact points between the steel wheels and the steel rail heads, or procuring streetcar vehicles that can operate effectively along tracks with radii less than 100 feet without causing wheel squeal to occur; and
- reducing the intensity of the streetcar warning bell (as safety protocols allow).

The two remaining properties are expected to experience moderate noise impacts under the build condition; these two properties are the apartment building located at 4208 Benning Rd and the block of rowhouses located between 4201 and 4243 Benning Rd. These impacts are associated with the use of the streetcar warning bell. These impacts will be mitigated by reducing the intensity of the streetcar warning bell and shifting the 42nd Street stop to the west side of the intersection. From a cumulative perspective, the noise from future streetcar operations represents only two percent of the noise that will be generated on Benning Road under the build condition. As a result, the overall noise impact is expected to be approximately the same as loudest hour noise levels predicted using FHWA's Traffic Noise Model (TNM). As stated previously, the build condition noise levels predicted by TNM are within 1 decibel of existing noise levels within the Benning Road corridor and are therefore; not anticipated to constitute an adverse effect under Section 106 of the Historic Preservation Act.

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 25: Oklahoma Avenue to Kingman Island, Build Alternative 2 (wired)



Figure 26: Oklahoma Avenue to Kingman Island, Build Alternative 2 (wireless)



Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 27: Kingman Island to 36th Street, Build Alternative 2 (wired)



Figure 28: Kingman Island to 36th Street, Build Alternative 2 (wireless)



Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 29: Minnesota Avenue to 45th Street, Build Alternative 2 (wired)



Figure 30: Minnesota Avenue to 45th Street, Build Alternative 2 (wireless)



Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 31: Median Platform at 42nd Street - Eastward View, Build Alternative 2 (wired)



Figure 32: Median Platform at 42nd Street - Westward View, Build Alternative 2 (wired)



Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

3.2.4 TPSS

TPSS – Wired and wireless propulsion would be supported by TPSS facilities that supply electricity at intervals along an electrically powered transit system. The TPSS facility sites are shown in Figure 33 and would be located on land that is not part of an historic property and would not be adjacent to or near an historic property. The TPSS facilities are preliminarily determined to have no adverse effect on historic properties.

3.2.5 Propulsion System

The source of propulsion power for the proposed streetcar service would be electricity. DDOT is considering wired or wireless options for each Build Alternative. As described for Build Alternative 1, wired and wireless propulsion system options for Build Alternative 2 are preliminarily determined to have no adverse effect on historic properties.

3.2.6 DC Streetcar Car Barn Training Center

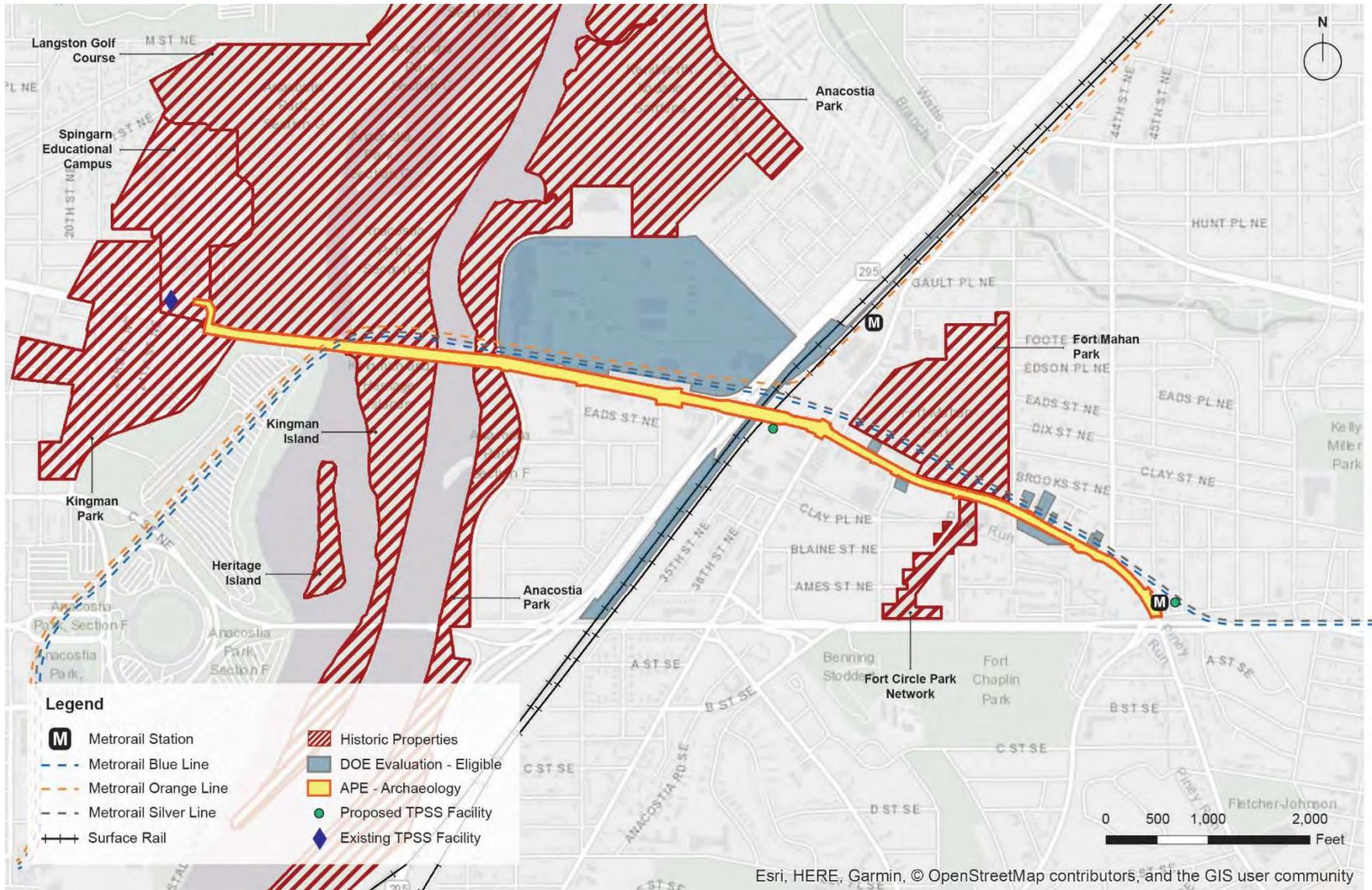
The proposed connection to the DC Streetcar Car Barn Training Center would be located within the DDOT right-of-way within the boundaries of the Browne, Phelps, Spingarn, and Young Educational Campus Historic District, as well as the Kingman Park Historic District. While the connection to the car barn is within these historic districts, it would be constructed entirely within the existing roadway and is therefore on land that is not part of an historic property and would not be adjacent to or near an historic property. The connection is preliminarily determined to have no adverse effect on historic properties.

3.3 Treatment of Historic Properties

DDOT, in consultation with the DC SHPO has agreed to provide mitigation for the impacts of proposed safety improvements on the fire call box located at Benning Road and Minnesota Avenue by proposing their relocation in the same general area. As the project moves into final design, DDOT will continue to coordinate with the DC SHPO regarding the site selection and placement of the fire call box. In addition, noise reduction measures will be used to reduce the noise generated by streetcar operations to the greatest degree possible. Replacement tree plantings will be used to offset the aesthetic impact of tree removal. During final design, DDOT will also investigate the feasibility of burying overhead utility lines in key locations to further reduce the influence of new visual elements. Since the proposed project occurs on a highly disturbed land, it is anticipated that there would be no intact archeological resources within the direct APE of the project. Much of the project area has not been surveyed for the archeological resources. However, as the project moves into final design, DDOT will continue consultation with SHPO to identify if any aspect of the project has a potential to adversely affect any intact archeological resources and if a Phase I archeological survey is needed.

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

Figure 33: Potential TPSS Locations



4.0 Conclusions

Based on the evaluations of historic properties and archaeological resources in terms of eligibility for the NRHP and the preliminary assessment of effects for the undertaking, DDOT preliminarily determines that the proposed action would not adversely affect historic properties in accordance with Section 106 of the NHPA and its implementing regulations (36 CFR 800). As the project moves into final design, DDOT will continue to coordinate with the DC SHPO, FHWA, and the public to review any changes to the proposed improvements and any new sources of relevant environmental information.

5.0 Resources

Beauchamp Tanya E. and Antoinette E. Lee

2003 *National Register of Historic Places Multiple Property Documentation Form, Public School Buildings of Washington, D.C., 1862-1960*. On file, District of Columbia Historic Preservation Office, Washington, D.C.

Cole, Joseph H.

1989 *National Register of Historic Places Registration Form, Langston Golf Course Historic District*. On file, District of Columbia Historic Preservation Office, Washington, D.C.

Dillon, Helen

1972 *National Register of Historic Places Registration Form, Civil War Fort Sites (Defense of Washington)*. On file, District of Columbia Historic Preservation Office, Washington, D.C.

Dillon, James

1978 *National Register of Historic Places Registration Form, Defenses of Washington (Civil War Fort Sites)*. Boundary increase. On file, District of Columbia Historic Preservation Office, Washington, D.C.

Eig, Emily H. and Laura H. Hughes

1994 *National Register of Historic Places Registration Form, Apartment Buildings in Washington, D.C. 1880-1945*. On file, District of Columbia Historic Preservation Office, Washington, D.C.

Kingman Park Civic Association

2012 *Government of the District of Columbia Historic Preservation Office, Historic Preservation Review Board Application for Historic Landmark or Historic District Designation, Spingarn Senior High School, landscape and grounds*. On file, District of Columbia Historic Preservation Office, Washington, D.C.

2013 *Government of the District of Columbia Historic Preservation Office, Historic Preservation Review Board Application for Historic Landmark or Historic District Designation, Browne Junior High School, Charles young Elementary School, and Phelps Architecture, Construction and Engineering (aka Vocations) High School, and Their Grounds and Surrounding Landscape's Educational Campus and Historic District*. On file, District of Columbia Historic Preservation Office, Washington, D.C.

Leiner, Glen B.

1986 *National Register of Historic Places Registration Form, Langston Terrace Dwellings*. On file, District of Columbia Historic Preservation Office, Washington, D.C.

National Park Service

2011 *Environmental Assessment Anacostia Riverwalk Trail Section 3 Realignment Anacostia Park*. National Park Service, U.S. Department of the Interior, National Capital Parks – East, Washington, D.C.

Benning Road and Bridges Transportation Improvements Environmental Assessment: Appendix F

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6.0 Appendix A

List of Appendix Items

Letter Initiating 106 Consultation Process.....F-A001
Date: February 18, 2014

Initial DC SHPO Comments on 106 Consultation.....F-A004
Date: March 25, 2014

DC SHPO Comments on DOE Forms.....F-A006
Date: August 20, 2014

DC SHPO Comments on DOE Forms.....F-A023
Date: April 8, 2015

The Committee of 100 of the Federal City Consulting Party Response Letter.....F-A026
Date: Sept 19, 2015

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF TRANSPORTATION**

d. Infrastructure Project Management Administration

February 18, 2014

Mr. David Maloney
District of Columbia State Historic Preservation Office
1100 4th Street, SW
Suite E650
Washington, DC 20024

Subject: Benning Road and Bridge Transportation Improvements Environmental Assessment
and Section 106 Evaluation

Dear Mr. Maloney:

The District Department of Transportation (DDOT), in cooperation with the Federal Highway Administration (FHWA) is preparing an Environmental Assessment (EA) for the Benning Road and Bridge Transportation Improvements Project in accordance with the National Environmental Policy Act (NEPA). The project will also consider effects to historic properties in accordance with the requirements of Section 106 of the National Historic Preservation Act (16 USC §470) and its implementing regulations (36 CFR Part 800). The purpose of this letter is to initiate Section 106 consultation for the Benning Road and Bridge Transportation Improvements Project.

The Benning Road and Bridge Transportation Improvements Project is located in Northeast Washington, DC. The project area extends from the intersection of Benning Road and Oklahoma Avenue to the Minnesota Avenue and Benning Road Metrorail Stations (see attached location map). The majority of proposed improvements would occur within the existing right-of-way and would address Safety, Roadway and Bridge conditions, Multi-modal Transportation Improvements, Transit needs, and pedestrian safety and access. The agency scoping meeting for the project will be held on Tuesday March 4, 2014 at 9:00 am at DDOT Office, Conference Room 439, 55 M St, SE, Washington DC 20003 as part of the monthly DDOT Interagency meeting.

District Department of Transportation | 55 M Street, SE, Suite 400, Washington, DC 20003 | 202.671.2800 | ddot.dc.gov

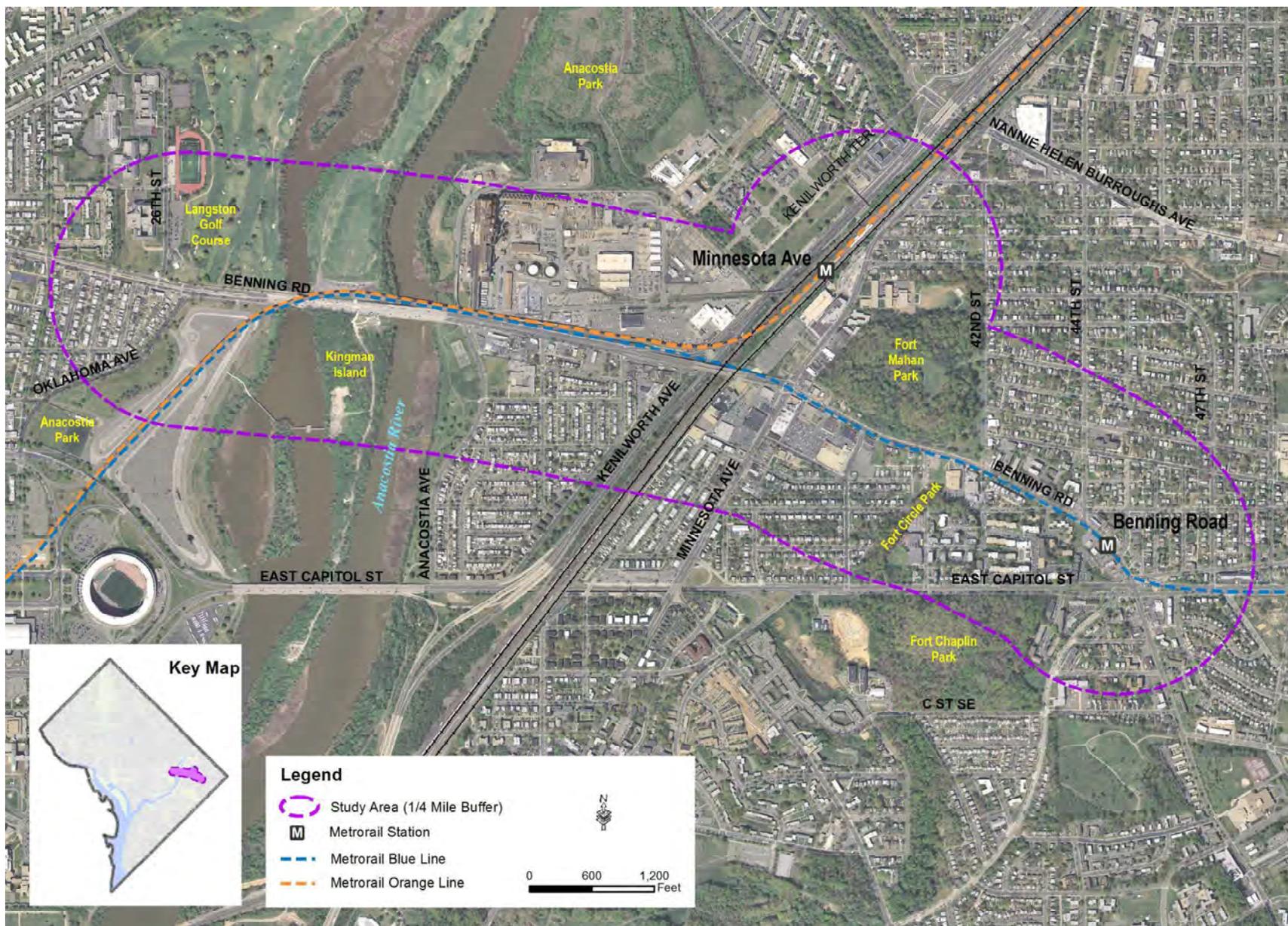
We will contact you shortly to set up meetings to discuss this project. Please contact me if you have additional questions or comments. Thank you very much, and we look forward to working with you on this project.

Sincerely,

Clarence Dickerson
Project Manager,
202-671-4586

Cc: Faisal Hameed, DDOT
Mike Hicks, FHWA
Daniel Koenig, FTA
Andrew Lewis, DC SHPO
Jennifer Hirsh, NCPC
David Hayes, NPS
Carol Legard, ACHP

Figure 1: Project Location Map



GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



March 25, 2014

Mr. Clarence Dickerson
Project Manager
District Department of Transportation
Infrastructure Project Management Administration
55 M Street, SE
Suite 400
Washington, DC 20003

RE: Initiation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

Dear Mr. Dickerson:

Thank you for initiating consultation with the DC State Historic Preservation Office (SHPO) regarding the above-referenced undertaking which we understand is to be carried out with assistance from the Federal Highway Administration and the Federal Transit Administration. We are writing in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800, to provide our initial comments regarding effects on historic properties.

Based upon a review of your submittal and recent discussions with DDOT staff, we understand that the project will involve a variety of transportation-related improvements designed to facilitate an extension of the forthcoming “One City Streetcar Line” from the intersection of 26th Street and Benning Road, NE to locations near the Benning Road and/or Minnesota Avenue Metro Stations. Since the project is still in the early planning phases, a draft Area of Potential Effect (APE) has yet to be prepared but, by referring to the “Study Area” shown in the image to the right, we identified several known historic properties and several which we believe should be evaluated using our Determination of Eligibility Form in order to determine whether they are eligible for listing in the National Register of Historic Places. The known historic properties and those recommended for evaluation are listed on the following pages.



Mr. Clarence Dickerson
Initiation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)
March 25, 2014
Page 2

The listed/eligible properties include:

1. The Langston Terrace Dwellings at 21st Street and Benning Road, NE
2. Spingarn High School at 2500 Benning Road, NE
3. The Brown, Phelps, and Young Schools just to the north of Spingarn
4. The Langston Golf Course
5. The Anacostia Park Historic District
6. The Senator Theater Entrance Pavilion at 3950 Minnesota Avenue, NE
7. Fort Circle Parks Historic District/Fort Mahan
8. Engine Company No. 27 at 4201 Minnesota Avenue, NE
9. Mayfair Mansions at Kenilworth Avenue, Jay and Hayes Streets, NE

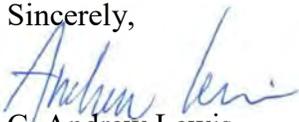
The properties recommended for evaluation using a DOE Form include:

1. The Pepco Power Plant Complex at Benning Road
2. 3341 Benning Road, NE: a streamlined currently building known as the “Washington Insurance”
3. 3439 Benning Road, NE: a mid-1940s automobile-related shopping complex
4. 3445 Benning Road, NE: a substantially altered, but relatively early building
5. 4202 Benning Road, NE: potentially associated with late 19th century African-American Community/Designed by African-American architects
6. 4208 Benning Road, NE: Potentially associated with late 19th century African-American Community/Designed by African-American architects
7. 4248 Benning Road, NE: a building with some modest architectural detail
8. 4270 Benning Road, NE: “New Mount Calvary Baptist Church” may have been relocated from the east side of East Capitol and the former site of Payne’s Cemetery.
9. 4510 East Capitol Street, NE: the “Shrimp Boat” was constructed c. 1953 and already considered a “landmark” of sorts by the local community.

Please note that additional survey and/or DOEs may be recommended after we learn more about the scope of the project, review a draft APE, and consider the comments of the consulting parties. Also note that, depending upon the extent and location of ground disturbing activities associated with the project, archaeological survey may be required in order to determine the potential for effects on archaeological resources.

We look forward to consulting further with all parties to continue the Section 106 review of this undertaking. If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841 (for historic built environment) or Ruth Troccoli at ruth.troccoli@dc.gov or 202-442-8836 (for archaeology). Otherwise, thank you for providing this initial opportunity to review and comment.

Sincerely,



C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

14-069

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



August 20, 2014

Mr. Clarence Dickerson
Project Manager
District Department of Transportation
Infrastructure Project Management Administration
55 M Street, SE
Suite 400
Washington, DC 20003

RE: Continuation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

Dear Mr. Dickerson:

Thank you for providing additional information about the above-referenced undertaking. Based upon our review of the supplemental documentation and the discussions held during our recent monthly meetings with DDOT, we are writing in accordance with Section 106 of the National Historic Preservation Act to provide further comments regarding the identification of, and potential effects on, historic properties.

We have reviewed the revised Area of Potential Effect (APE) for the project (shown in the image below) and concur that it should be generally sufficient to take into account the direct and indirect effects of the project, based upon the information we have reviewed to-date. However, we recommend that the schools along 26th Street, NE (i.e. Spingarn, Brown, Phelps and Young) be included in the APE since their location atop the hill provides an unobstructed view of the project area along Benning Road.

These properties have already been determined eligible for listing in the National Register of Historic Places as a historic district that has yet to be named. If necessary, the APE can be further revised at a later time to address other potential historic properties that may be affected by the project.



Mr. Clarence Dickerson

Continuation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

August 20, 2014

Page 2

As you may recall, the following properties were recommended for evaluation using a Determination of Eligibility (DOE) Form in our letter of March 25, 2014:

1. The Pepco Power Plant Complex at Benning Road
2. 3341 Benning Road, NE: a streamlined currently building known as the “Washington Insurance”
3. 3439 Benning Road, NE: a mid-1940s automobile-related shopping complex
4. 3445 Benning Road, NE: a substantially altered, but relatively early building
5. 4202 Benning Road, NE: potentially associated with late 19th century African-American Community/Designed by African-American architects
6. 4208 Benning Road, NE: Potentially associated with late 19th century African-American Community/Designed by African-American architects
7. 4248 Benning Road, NE: a building with some modest architectural detail
8. 4270 Benning Road, NE: “New Mount Calvary Baptist Church” may have been relocated from the east side of East Capitol and the former site of Payne’s Cemetery.
9. 4510 East Capitol Street, NE: the “Shrimp Boat” was constructed c. 1953 and already considered a “landmark” of sorts by the local community.

Since our initial letter, the project consultants have identified a number of other properties within the APE that are 50 years old or older and recommended for survey. Based upon our review of those properties, we offer the following comments:

10. Call boxes along Benning Road, NE: evaluate with a DOE.
11. 4001 Benning Road, NE: evaluate with a DOE.
12. 3399 Benning Road, NE: evaluate with a DOE.
13. 3621 Benning Road, NE: no need to evaluate with a DOE. No distinction or integrity.
- 14(a). Vicinity of 3700 Benning Road, NE: evaluate with a DOE.
- 14(b). 3703-05 Benning Road, NE: previously considered as part of DC Warehouse Survey. Not identified as eligible, but may have potential for significance based upon more in-depth research. Evaluate with a DOE.
15. 3917 Benning Road, NE: no need to evaluate with a DOE. No distinction or integrity.
16. 3919 Benning Road, NE: no need to evaluate with a DOE. Extensively altered. No integrity.
17. 3934 Benning Road, NE: no need to evaluate this particular residence.
18. 3938 Benning Road, NE: most likely the work of African-American Architect Lewis Giles (see attached partial bio). Evaluate with a DOE.
19. 3940 Benning Road, NE: most likely the work of African-American Architect Gus Bull (see attached partial bio). Evaluate with a DOE.
20. 3942 Benning Road, NE: no need to evaluate this particular residence.
21. 4035-4037 Benning Road, NE: no need to evaluate this particular residence.
22. 4049 Benning Road, NE: no need to evaluate this particular residence.
23. 4053 Benning Road, NE: most likely the work of African-American Architect Lewis Giles (see attached partial bio). Evaluate with a DOE.
24. 4057 Benning Road, NE: no need to evaluate this particular residence.
25. 4061 Benning Road, NE: no need to evaluate this particular residence.

Mr. Clarence Dickerson

Continuation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

August 20, 2014

Page 3

26. 4145 Benning Road, NE: previously determined unlikely to be eligible based on cursory review. Additional research would be beneficial. Evaluate with a DOE.
27. 4201-4243 Benning Road, NE: part of historically black community called "Capital View." Evaluate with a DOE.
28. 4228 Benning Road, NE: most likely the work of African-American Architect R. C. Archer (see attached partial bio). Evaluate with a DOE.
29. 4234 Benning Road, NE: most likely the work of African-American Architect Lewis Giles (see attached partial bio). Evaluate with a DOE.
30. 4236 Benning Road, NE: most likely the work of African-American Architect Cyril Bow (see attached partial bio). Evaluate with a DOE.
31. 4244 Benning Road, NE: no need to evaluate this particular residence.
32. 4246 Benning Road, NE: no need to evaluate this particular residence.
33. 4254 Benning Road, NE: most likely the work of African-American Architect Lewis Giles (see attached partial bio). Evaluate with a DOE.
34. 4256-4264 Benning Road, NE: evaluate with a DOE. May date to 1954 and fall outside the scope of "Apartment Buildings in Washington DC 1880-1945" Multiple Property Document.
35. 4280 Benning Road, NE: most likely the work of George T. Santmyers. Evaluate with a DOE. May date to 1942 and fall within the scope of "Apartment Buildings in Washington DC 1880-1945" Multiple Property Document.
36. 4280 Benning Road, NE: no need to evaluate this particular residence.
37. 4414 Benning Road, NE: previously determined ineligible. No longer extant.
38. 4430 Benning Road, NE: No longer extant.
39. 4212 East Capitol Street, NE: evaluate with a DOE.

We look forward to continuing consultation. To that end, some additional information about the above-referenced architects may be available in our files. We will be pleased to make this information available for purposes of completing the requested DOE Forms. And as for archaeology, much of the project area has not been surveyed. Please remember to begin identifying staging areas and other sites where ground disturbing activities may be anticipated outside of the existing streets. We will provide additional comments regarding the need for any archaeological survey after more specificity about project-related ground disturbance can be established.

If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841 (for historic built environment) or Ruth Troccoli at ruth.troccoli@dc.gov or 202-442-8836 (for archaeology). Otherwise, thank you for providing this additional opportunity to review and comment.

Sincerely,



C. Andrew Lewis

Senior Historic Preservation Specialist
DC State Historic Preservation Office

14-069

LEWIS WENTWORTH GILES, SR. (1894-1974)

Lewis Wentworth Giles was born in 1894 in Amelia County, in southside Virginia southwest of Richmond. Although Giles has been little studied, he appears to have been one of Washington's most prolific early 20th century African American architects. By 1908, Giles had moved to Washington where he attended Armstrong Technical School, graduating in 1913.¹ He attended the University of Illinois from 1914 to 1917² but was drafted into the army before he could graduate.³ He worked for African American architect Isaiah T. Hatton (see biography) from 1918 until Hatton's untimely death in 1921.⁴ Giles appears to have continued Hatton's practice from office space in the Pythian (True Reformer Building) at 12th and U Street, NW.⁵ In 1929, he moved his practice to his Deanwood residence at 4428 Hunt Place, NE, where he remained through 1950. Like a number of African American architects, Giles did not seek registration until 1950, when the law changed to require architectural registration for preparation of plans for buildings over 2 stories or 1000 sq. ft. Giles' son, Lewis Giles, Jr. (see biography), also went to the University of Illinois and became an architect. Lewis Giles, Sr. died in 1974.⁶

Sources: D.C. Board of Examiners and Registrars of Architects Case Files; D.C. City Directories; D.C. Engineer's Records for Isaiah T. Hatton; Lee, J.V. "Deanwood Historic Study: The Role of Black Architects in the Development of Deanwood;" Oral interview with Lewis Giles, Jr.

Illustrations: Material from Lewis Giles, Sr. scrapbook

Further work: Incorporate material from oral interview with Lewis Giles, Jr.
Incorporate material from Lewis Giles, Sr. scrapbook

BB: 10/16/95

GUS BULL

Gus Bull was listed as an architect in the 1936 City Directory. His residence was located at 2224 12th Place, N.W. In 1933, the Board of Architectural Registration noted that "the name G.N. Bull, Architect" was printed on Romulus Archer's letterhead and wrote Archer that "Mr. Bull is not entitled to any designation which would indicate or imply that he is an architect or a registered architect."¹ Bull designed houses in Deanwood.²

Sources: D.C. City Directories; D.C. Board of Examiners and Registrars of Architects Case File for Romulus Archer; Lee, J.V. "Deanwood Historic Study: The Role of Black Architects in the Development of Deanwood."

Illustration: None

BB: 10/9/95

ROMULUS C. ARCHER, JR. (1890-1968)

Romulus Cornelius Archer, Jr. was born in Norfolk, Virginia in 1890 and died in Washington, D.C. in 1968. Both his father and uncle were contractors in Virginia.¹ Archer worked as a carpenter before he became an architect.² He was the son of Romulus C. Archer, a contractor who was listed in the 1908 Norfolk City Directory as a plasterer.³ Archer attended Norfolk public schools, graduating from high school in June 1908. He enrolled in Norfolk Mission College for two terms (1908-1910) and in another school for three terms (1911-1913).⁴ He then attended Columbia University's School of Architecture for one year in 1913.⁵

In his application for registration, Archer stated that he began the practice of architecture in 1915.⁶ Archer joined the Army in 1916 and served as a bandsman in World War I.⁷ From June 1921 through November 15, 1921, Archer worked in the Supervising Architect's office in the U.S. Treasury Department. He opened his own office in Washington in December 1921, producing designs for churches, educational buildings, and small commercial structures. Archer was among the first African American architects to be registered in the District of Columbia. His registration number was 117, dated January 15, 1926. Archer's letterhead for that year listed "branches" in Norfolk and Durham.⁸

During World War II Archer worked as a drafting instructor for the government.⁹ In addition to his registration in the District, Archer was registered to practice architecture in Maryland, North Carolina, and Virginia. In 1954 he received the Washington Board of Trade Award for Superior Design and in 1964 the "Y" Men named him "Citizen of the Year" for providing employment opportunities for minorities.¹⁰ Gus Bull, Victor Agebite,

Continued Next Page

Leroy Brown, and John Nixon were among the African Americans who worked in Archer's office.¹¹

Archer was a member of the National Technical Association and served as the organization's treasurer for a number of years. He was also a member of the Florida Avenue Baptist Church, which he joined in 1921. Archer was married to Louise Archer, a teacher who was a native of Fayetteville, North Carolina. At the time of her death in 1948, she resided in Durham, North Carolina.¹² Both she and Archer are buried in Arlington National Cemetery.

Sources: Arlington National Cemetery Burial Records (Arlington National Cemetery Administration); D.C. City Directories; D.C. Board of Examiners and Registrars of Architects Case Files; Ethridge, Harrison Mosley. "The Black Architects of Washington, D.C., 1900-Present. Ph.D. Dissertation, Catholic University of America, 1979; Oral Interview with John H. Nixon, July 1994; "Romulus C. Archer, Jr., 77, Architect Here for 40 Years." *Evening Star*, December 1, 1968; Wells, John. "The Virginia Architects, 1820-1955," mss. of forthcoming book, courtesy of the author; Wirz, Hans and Richard Striner. *Washington Deco: Art Deco in the Nation's Capital*. Washington: Smithsonian Institution Press, 1984.

Illustrations: Photo with obit

Further Work: Check Board of Trade files -- bldg for 1954 award
Check 1964 NTA Bulletin for Obituary

CYRIL G. BOW

Originally from Syracuse, New York, Cyril Bow received his B. Arch. from Cornell University. For many years he was the chief draftsman in the office of Albert I. Cassell.¹

His wife, Marguerite Smith Bow, was a music teacher in the Washington public schools for 33 years (Wormley, Young and Phillips schools). She graduated from Miner Normal School and Howard University School of Music (1924). The Bows were members of St. Mary's Episcopal Church. Mrs. Bow died in 1945 and was buried in Harmony Cemetery.²

Sources: Obituary of wife Marguerite Smith Bow. *Washington Post* and *Washington Star*, July 8, 1945; Julian Euell. Oral history interview with Clarence B. Wheat, ; Historic American Buildings Survey documentation for Founders Library compiled by Harrison M. Ethridge; National Technical Association, *National Technical Year Book, 1936-37*, Detroit, 1937; National Technical Association, *National Technical Association Directory, 1949*.

Illustrations: None

Further Research: Call St. Mary's.

HE: 10/16/95



AECOM
516 East State Street
Trenton, NJ 08609
www.aecom.com

609-599-4261 tel
609-392-3785 fax

Memorandum

To Karl Kratzer, AECOM Page 9

CC Angela Jones; John Lawrence (AECOM)

Subject Benning Road Improvements, Historic Architecture Identification Effort

From Johnette Davies

Date June 25, 2014 Revised July 28, 2014

In March 2014, the District of Columbia Historic Preservation Office (DCHPO) provided preliminary guidance about the potential for historic resources within the project study area, including properties recommended for survey and National Register eligibility evaluation under Section 106 of the National Historic Preservation Act. This guidance was based upon a review of known and potential properties in the project Study Area.

The purpose of this memorandum is to confirm the level of effort required to meet the good faith historic properties identification requirement under Section 106. This memorandum provides a proposed Area of Potential Effect (APE) for the project and identifies properties within the proposed APE for the Preferred Alternative (eliminating properties along Minnesota Avenue) that meet the 50-year age criteria for National Register eligibility evaluation. It also enumerates properties previously recommended for survey by DCHPO, as well as additional properties recommended for survey by AECOM.

Properties Recommended for Evaluation by DCHPO

In a letter dated March 25, 2014, DCHPO recommended that the following properties be evaluated for this project:

Table 1: Properties Recommended for Evaluation by DCHPO		
Number	Address	Notes
1	3300 Benning Road, NE	Pepco Power Plant Complex. Built in 1906, the plant was expanded in 1968 and 1972
2	3341 Benning Road, NE	a streamlined building currently known as the "Washington Insurance" building
3	3431-39 Benning Road, NE	a mid-1940s automobile-related shopping complex
4	3445 Benning Road, NE	a substantially altered, but relatively early building, now "Benning Liquors"
5	4202 Benning Road, NE	potentially associated with late 19 th -century African-American community/designed by African-American architects
6	4208 Benning Road, NE	Potentially associated with late 19th century African-American community/designed by African-American



		architects
7	4248 Benning Road, NE	building with some modest architectural detail
8	4270 Benning Road, NE	New Mount Calvary Baptist Church; may have been relocated from the east side of East Capitol and the former site of Payne's Cemetery
9	4510 East Capitol Street, NE	The "Shrimp Boat:" constructed c. 1953, it is already considered a "landmark" of sorts by the local community

The location of these and all other properties described in this document is shown on the attached graphic entitled "Potential Historic Properties in the APE." The map shows where each parcel is located. Please note that some parcels show footprints for buildings less than 50 years of age.

Properties Recommended for Survey by AECOM

In addition to the specific properties identified by DCHPO in Table 1, the agency's letter further states the following:

Please note that additional survey and/or DOEs may be recommended after we learn more about the scope of the project, review a draft APE, and consider the comments of the consulting parties.

The properties in **Table 2** below are recommended for survey because they may have historic or architectural significance based upon preliminary research to date and a brief field view; they also appear to have good integrity.

Table 2: Additional Properties Recommended for Evaluation			
Number	Address	Notes	
10	Benning Road, NE	Call boxes along roadside (photo shows typical examples)	
11	4001 Benning Road, NE	Stewart's Funerals: funeral home built in 1964 for an African-American family-owned and operated business founded in 1900.	



Additional Properties 50 Years or Older in the APE

There are a number of additional properties along the corridor that meet the 50-year age criterion for evaluation that were not included in DCHPO or AECOM recommendations; these are listed in **Table 3**, below. It is unknown at this time whether any of the apartment buildings in Table 3 were built within the period of significance defined in the Multiple Property Documentation Form, "Apartment Buildings of Washington DC 1870-1945." All properties below are in order from west to east.

Table 3: Additional Properties 50 Years and Older in the APE			
Number	Address	Notes	
12	3399 Benning Road, NE	Mid-20 th -century auto sales and service building, now D&C Cab	
13	3621 Benning Road, NE	c. 1952 warehouse and cold storage facility, now Sam's Auto Car/ New Horizons Auto Body Repair	
14	Vicinity of 3700 Benning Road, NE	Former Baltimore & Potomac Railroad/ Alexandria Branch, Baltimore & Ohio Railroad/Pennsylvania Railroad	[no photo]
15	3703-05 Benning Road, NE	Appears to be early 20 th -century warehouse/storage facilities	



<p>16</p>	<p>3917 Benning Road, NE</p>	<p>Connected to a strip mall that faces Minnesota Avenue; little to no historical integrity</p>	
<p>17</p>	<p>3919 Benning Road, NE</p>	<p>Early-20th-century building; some Art Deco details remain at a portion of the cornice, but otherwise altered</p>	
<p>18</p>	<p>3934 Benning Road, NE</p>	<p>Early 20th-century residence, Tudor Revival</p>	
<p>19</p>	<p>3938 Benning Road, NE</p>	<p>Early 20th-century residence, Four Square (building at left in photograph)</p>	
<p>20</p>	<p>3940 Benning Road, NE</p>	<p>Early 20th-century residence, Colonial Revival (building at right in photograph)</p>	



21	3942 Benning Road, NE	Early 20 th -century residence, Colonial Revival	
22	4035-4037 Benning Road, NE	Mid-20 th -century triplex, Tudor Revival	
23	4049 Benning Road, NE	Early 20 th -century duplex	
24	4053 Benning Road, NE	Early 20 th -century residence	
25	4057 Benning Road, NE	Early 20 th -century residence	



26	4061 Benning Road, NE	Mid-20 th -century residence, altered bungalow	
27	4145 Benning Road, NE	Mid-20 th -century police station; extension along 42 nd St.	
28	4201-4243 Benning Road, NE	Early-mid-20 th -century block of rowhouses	
29	4228 Benning Road, NE	Mid-20 th -century apartment building	
30	4234 Benning Road, NE	Early 20 th -century residence (building at left in photograph)	



<p>31</p>	<p>4236 Benning Road, NE</p>	<p>Mid-20th-century apartment building (building at right in photograph)</p>	
<p>32</p>	<p>4244 Benning Road, NE</p>	<p>Early 20th-century residence (building at left in photograph)</p>	
<p>33</p>	<p>4246 Benning Road, NE</p>	<p>Early 20th-century residence with commercial front addition (second building from left in photograph)</p>	
<p>34</p>	<p>4254 Benning Road, NE</p>	<p>Early 20th-century residence</p>	
<p>35</p>	<p>4256-4264 Benning Road, NE</p>	<p>Mid-20th-century apartment buildings</p>	



36	4274 Benning Road, NE	Mid-20 th -century apartment building (building at right in photograph)	
37	4280 Benning Road, NE	Early 20 th -century residence, brick bungalow	
38	4414 Benning Road, NE	Mid-20 th -century restaurant	
39	4430 Benning Road, NE	Former filling station, mid-20 th -century	
40	42121 E. Capitol St, NE	Fort Chaplin Park Apartments & Townhomes. Some buildings in the complex face the 4300 block of Benning Road	



41	217-223 42 nd Street, NE	Mid-20 th -century duplexes	
42	227 and 231 42 nd Street, NE	Mid-20 th -century apartments	

A transit Car Barn that meets the 50-year age criterion for evaluation is located within the PEPCO Power Plant parcel, along Kenilworth Avenue. However, later buildings and the elevated Metro line effectively screen the proposed work from the building's viewshed and setting. We recommend that the Car Barn does not require evaluation for the purposes of this project.

Proposed Next Steps

The next step for the project is to seek concurrence among DDOT, and DCHPO regarding the level of effort required for the identification of historic properties for this project. The agencies should determine whether all of the potential resources listed in the tables above must be evaluated, whether to limit the evaluations to those previously recommended by DCHPO, or a combination thereof to meet the good faith identification requirement under Section 106. A DCHPO Determination of Eligibility (DOE) form will need to be completed for each property ultimately recommended for survey and evaluation.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



April 8, 2015

Mr. Michael Hicks
Environmental Manager
U.S. Department of Transportation
Federal Highway Administration
District of Columbia Division
1990 K Street, NW
Suite 510
Washington, DC 20006-1103

RE: Formal Initiation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

Dear Mr. Hicks:

Thank you for your letter of March 16, 2015 which served to formally initiate consultation with the District of Columbia State Historic Preservation Officer (DC SHPO) regarding the above-referenced undertaking. As you are aware, we have been working with DDOT over the last several months to carry out preliminary identification and evaluation efforts that will assist FHWA in meeting its obligations under Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

Of particular note are a number of Determination of Eligibility (DOE) Forms that were prepared by the project consultants and forwarded to our office for review. We appreciate that the forms were thoroughly researched and well-written. Our overall recommendations regarding National Register eligibility are summarized in the attached table. More detailed comments have been incorporated directly into the DOEs which we will forward electronically.

We look forward to consulting further with FHWA and all parties to continue the Section 106 review process. If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841 (for historic built environment) or Ruth Trocolli at ruth.trocolli@dc.gov or 202-442-8836 (for archaeology). Otherwise, thank you for providing this opportunity to review and comment.

Sincerely,

C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

14-069

Mr. Michael Hicks

Formal Initiation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

April 8, 2015

Page 2

**DC SHPO Recommendations Regarding the Determinations of Eligibility for the Benning Road
and Bridge Transportation Improvements Project
(Benning Road Extension)**

	Recommended Eligible by DC SHPO	Recommended Ineligible by DC SHPO
1		217-223 42nd Street NE
2		227 - 231 42nd Street NE
3	3300 Benning Road NE; PEPCO Power Plant Bld 32	
4		3341 Benning Road NE
5		3399 Benning Road, NE; District Cab Company
6		3423 - 3439 Benning Road, NE
7		3455 Benning Road, NE; Benning Liquors
8		3701 Benning Road, NE; A. Loeffler Sausage & Provisions Co.
9	3938 Benning Road, NE	
10		3940 Benning Road, NE; Kerrick House
11	4001 Benning Road, NE; Stewarts Funerals	
12		4053 Benning Road, NE
13		4145 Benning Road, NE; Police Station/MPD HQ
14	4201 - 4243 Benning Road, NE	
15		4202 Benning Road, NE; Mike's Market; Sherman's Market
16	4208 Benning Road, NE	
17	4228 Benning Road, NE; Benning Road Apartments	
18		4234 Benning Road, NE
19	4236 Benning Road, NE	
20		4248 Benning Road, NE
21		4254 Benning Road, NE
22		4256 - 4264 Benning Road, NE
23	4270 Benning Road, NE; New Mt. Calvary Baptist Church	
24	4274 Benning Road, NE	
25		4510 Benning Road, NE; The Shrimp Boat Restaurant
26		B&O Railroad Alexandria Branch
27	B&P Railroad	
28	Fire and Police Call Boxes along Benning Road, NE	

4212 East Capitol Street, NE – Fort Chaplin Park
Apartments also determined ineligible

Hachey, Alan

From: Walker, Paul K (DHCD) <paul.k.walker@dc.gov>
Sent: Tuesday, March 11, 2014 12:36 PM
To: Clarence.Dickerson@dc.gov; Kratzer, Karl
Cc: Anyaegbunam, Oke (DHCD)
Subject: Benning Rd and Bridge Transportation Improvements Environmental Assessment

Clarence and Karl

I have read and reviewed the DDOT attachment that was sent to Robert Trent, former Chief of Staff here at the Department of Housing and Community Development. At this time we have no issues, comments or suggestion regarding the assessment of the environment and cultural resources for this project. Thank you for your consideration in this matter.

Sincerely
Paul Walker
Architect
Development Finance Division
Department of Housing and Community Developemnt

As you spring forward, check your smoke alarm. It may be time for a new one. The DC Fire and Emergency Medical Services Department provides free installations of smoke alarms for owner-occupied District homes. Request an installation at <http://311.dc.gov> or call 202-673-3331.

The Committee of 100 on the Federal City



www.committeeof100.net

September 19, 2015

Federal Highway Administration
Attn: Mr. Michael Hicks
District of Columbia Division
1990 K Street, NW, Suite 510
Washington, DC 20006-1103
Michael.Hicks@dot.gov

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Marilyn J. Simon

Frank Vespe

Bill Wright

945 G Street, N.W.

Washington, D.C. 20001

202.681.0225

info@committeeof100.net

RE: Section 106 Consulting Party Invitation for Benning Road & Bridge Transportation Improvement Project Environmental Assessment

Dear Mr. Hicks,

In response to Mr. Joseph Lawson's letter of July 27, 2015 inviting the Committee of 100 on the Federal City to serve as a Section 106 Consulting Party on the referenced project, this letter serves as the Committee of 100's acceptance. We are pleased to have been invited and look forward to participating in the Section 106 process for this important project.

The Committee of 100 on the Federal City has long been concerned with protecting and enhancing, in our time, the various elements of the L'Enfant Plan (1791-92) and the planning work of the McMillan Commission (1901-02) even as the city continues to evolve in the 21st century.

Official written correspondence should be sent to our mailing address as noted herein. Please send e-mails to the following addresses to help us ensure adequate representation at all meetings and distribution of documents within the Committee of 100:

Primary Representative: Monte Edwards monte.edwards@verizon.net

Secondary Representative: Meg Maguire megmaguireconsultant@msn.com

C100 Executive Staff: Byron Adams Badamsc100@verizon.net

Sincerely,

Meg Maguire
Transportation Subcommittee

Cc, Nancy MacWood, Sarah Campbell

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



December 5, 2019

Mr. Michael Hicks
U.S. Department of Transportation
Federal Highway Administration
District of Columbia Division
1990 K Street, NW, Suite 510
Washington, DC 20006-1103

RE: Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project
(Benning Road Extension)

Dear Mr. Hicks:

Thank you for continuing to consult with the District of Columbia State Historic Preservation Officer (DC SHPO) regarding the above-referenced undertaking. We are writing to provide additional comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

The FHWA letter dated December 4, 2019 summarizes the results of the consultation process that has been on-going since it was initiated in 2014. The letter also specifies a number of measures that will be implemented to avoid adverse effects on historic properties. We concur with the findings of that letter, including FHWA's determination that the undertaking will have "no adverse effect" on historic properties, provided that the specified avoidance measures are implemented, and the following two conditions are met:

1. FHWA/DDOT will consult with DC SHPO to determine the appropriate sites to relocate the historic fire and police call boxes in order to ensure their integrity of location and setting is diminished as little as possible (i.e. the relocation sites should be as close as possible to their historic locations); and
2. FHWA/DDOT will consult further with DC SHPO to determine the need for phased archaeological investigations in previously unsurveyed areas where ground disturbing activities are proposed.

If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841 (for historic built environment) or Ruth Troccoli at ruth.troccoli@dc.gov or 202-442-8836 (for archaeology). Otherwise, thank you for providing these opportunities to review and comment.

Sincerely,

C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

14-069

BENNING ROAD & BRIDGES TRANSPORTATION IMPROVEMENTS

THREATENED AND ENDANGERED SPECIES COORDINATION

FINAL AUGUST 2020



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TABLE OF CONTENTS

USFWS IPAC Species List	G-001
<i>August 08, 2017</i>	
Updated USFWS IPAC Species List.....	G-008
<i>October 16, 2019</i>	
USFWS No Effect Letter	G-023
<i>October 16, 2019</i>	
NOAA ESA Section 7 Mapper Output	G-046
<i>July 14, 2020</i>	
DDOT-NOAA No Adverse Effect Recommendation Letter	G-048
<i>July 16, 2020</i>	
NOAA No Adverse Effect Concurrence	G-064
<i>July 17, 2020</i>	
FHWA-NOAA Non-Federal Representative Designation Letter	G-066
<i>July 30, 2020</i>	
NOAA Non-Federal Representative Designation Response	G-068
<i>July 30, 2020</i>	
DDOT-DOEE Project Review Request Letter	G-070
<i>July 22, 2020</i>	
DOEE No Effect Determination	G-084
<i>August 05, 2020</i>	



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Chesapeake Bay Ecological Services Field Office
177 Admiral Cochrane Drive
Annapolis, MD 21401-7307
Phone: (410) 573-4599 Fax: (410) 266-9127

<http://www.fws.gov/chesapeakebay/>
<http://www.fws.gov/chesapeakebay/endsppweb/ProjectReview/Index.html>

In Reply Refer To:

August 08, 2017

Consultation Code: 05E2CB00-2017-SLI-1754

Event Code: 05E2CB00-2017-E-03698

Project Name: Benning Road and Bridge Transportation Improvements Environmental Assessment

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. This species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

08/08/2017

Event Code: 05E2CB00-2017-E-03698

2

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Wetlands

08/08/2017

Event Code: 05E2CB00-2017-E-03698

1

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Chesapeake Bay Ecological Services Field Office

177 Admiral Cochrane Drive

Annapolis, MD 21401-7307

(410) 573-4599

08/08/2017

Event Code: 05E2CB00-2017-E-03698

2

Project Summary

Consultation Code: 05E2CB00-2017-SLI-1754

Event Code: 05E2CB00-2017-E-03698

Project Name: Benning Road and Bridge Transportation Improvements Environmental Assessment

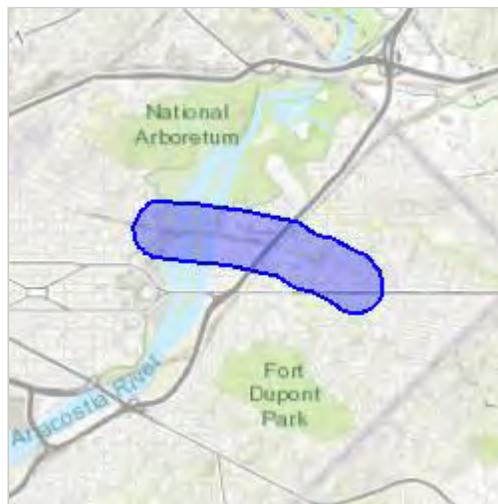
Project Type: TRANSPORTATION

Project Description: Transportation Project

Project Location:

Approximate location of the project can be viewed in Google Maps:

<https://www.google.com/maps/place/38.89416673711763N76.95330117779739W>



Counties: District of Columbia, DC

08/08/2017

Event Code: 05E2CB00-2017-E-03698

3

Endangered Species Act Species

There is a total of 0 threatened, endangered, or candidate species on this species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

Critical habitats

There are no critical habitats within your project area under this office's jurisdiction.

08/08/2017

Event Code: 05E2CB00-2017-E-03698

1

USFWS National Wildlife Refuges And Fish Hatcheries

Any activity proposed on [National Wildlife Refuge](#) lands must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuges or fish hatcheries within your project area.

08/08/2017

Event Code: 05E2CB00-2017-E-03698

1

Wetlands

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

FRESHWATER EMERGENT WETLAND

- [PEMIC](#)

RIVERINE

- [RIUBV](#)
- [RIUSN](#)

IPaC Information for Planning and Consultation U.S. Fish & Wildlife Service

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Project information

NAME

Benning Road and Bridge Transportation Improvements Environmental Assessment

LOCATION

District of Columbia County, District of Columbia



DESCRIPTION

The

proposed project involves extending the DC Streetcar along Benning Road from its existing eastern terminus to the Benning Metrorail Station. Completing this action will require: widening the existing roadway, construction new streetcar platforms at five locations, installing overhead propulsion wires, constructing two new traction power substations, modifying the deck of the Ethel Kennedy Bridge, and replacing the Whitlock Bridge. Secondary improvements include: widening and extending the existing sidewalk, renovating existing and installing

new lighting fixtures, and replacing street trees that will be impacted during construction.

Local office

Chesapeake Bay Ecological Services Field Office

☎ (410) 573-4599 

📠 (410) 266-9127 

177 Admiral Cochrane Drive
Annapolis, MD 21401-7307

<http://www.fws.gov/chesapeakebay/>

<http://www.fws.gov/chesapeakebay/endsppweb/ProjectReview/Index.html>

NOT FOR CONSULTATION

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Log in to IPaC.
2. Go to your My Projects list.
3. Click PROJECT HOME for this project.
4. Click REQUEST SPECIES LIST.

Listed species

¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

-
1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information.
 2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> This species only needs to be considered if the following condition applies: <ul style="list-style-type: none">• Projects with a federal nexus that have tree clearing = to or > 15 acres: 1. REQUEST A SPECIES LIST 2. NEXT STEP: EVALUATE DETERMINATION KEYS 3. SELECT EVALUATE under the Northern Long-Eared Bat (NLEB) Consultation and 4(d) Rule Consistency key No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/9045	Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act

¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This

is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)

Bald Eagle *Haliaeetus leucocephalus*

Breeds Oct 15 to Aug 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1626>

Black-billed Cuckoo *Coccyzus erythrophthalmus*

Breeds May 15 to Oct 10

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9399>

Bobolink *Dolichonyx oryzivorus*

Breeds May 20 to Jul 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Canada Warbler *Cardellina canadensis*

Breeds May 20 to Aug 10

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<p>Cerulean Warbler <i>Dendroica cerulea</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/2974</p>	Breeds Apr 29 to Jul 20
<p>Dunlin <i>Calidris alpina arctica</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA</p>	Breeds elsewhere
<p>Eastern Whip-poor-will <i>Antrostomus vociferus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds May 1 to Aug 20
<p>Golden Eagle <i>Aquila chrysaetos</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680</p>	Breeds elsewhere
<p>Golden-winged Warbler <i>Vermivora chrysoptera</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8745</p>	Breeds May 1 to Jul 20
<p>Kentucky Warbler <i>Oporornis formosus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds Apr 20 to Aug 20
<p>Least Tern <i>Sterna antillarum</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA</p>	Breeds Apr 20 to Sep 10
<p>Lesser Yellowlegs <i>Tringa flavipes</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679</p>	Breeds elsewhere
<p>Nelson's Sparrow <i>Ammodramus nelsoni</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds May 15 to Sep 5
<p>Prairie Warbler <i>Dendroica discolor</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds May 1 to Jul 31

<p>Prothonotary Warbler <i>Protonotaria citrea</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds Apr 1 to Jul 31
<p>Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds May 10 to Sep 10
<p>Red-throated Loon <i>Gavia stellata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds elsewhere
<p>Ruddy Turnstone <i>Arenaria interpres morinella</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA</p>	Breeds elsewhere
<p>Rusty Blackbird <i>Euphagus carolinus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds elsewhere
<p>Semipalmated Sandpiper <i>Calidris pusilla</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds elsewhere
<p>Short-billed Dowitcher <i>Limnodromus griseus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9480</p>	Breeds elsewhere
<p>Snowy Owl <i>Bubo scandiacus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds elsewhere
<p>Whimbrel <i>Numenius phaeopus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9483</p>	Breeds elsewhere
<p>Willet <i>Tringa semipalmata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds Apr 20 to Aug 5
<p>Wood Thrush <i>Hylocichla mustelina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds May 10 to Aug 31

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Golden Eagle
Non-BCC Vulnerable
(This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)

Golden-winged Warbler
BCC Rangwide (CON)
(This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Kentucky Warbler
BCC Rangwide (CON)
(This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Least Tern
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)

Lesser Yellowlegs
BCC Rangwide (CON)
(This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

SPECIES JAN FEB MAR APR MAY JUN JUL AUG SEP OCT NOV DEC

Nelson's Sparrow
BCC Rangwide (CON)
(This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Prairie Warbler
BCC Rangwide (CON)
(This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) and/or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review.

Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

WETLAND INFORMATION IS NOT AVAILABLE AT THIS TIME

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the [NWI map](#) to view wetlands at this location.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Chesapeake Bay Ecological Services Field Office
177 Admiral Cochrane Drive
Annapolis, MD 21401-7307
Phone: (410) 573-4599 Fax: (410) 266-9127

<http://www.fws.gov/chesapeakebay/>
<http://www.fws.gov/chesapeakebay/endsppweb/ProjectReview/Index.html>

IPaC Record Locator: 103-18727343

October 16, 2019

Subject: Consistency letter for the 'Benning Road and Bridge Transportation Improvements Environmental Assessment' project (TAILS 05E2CB00-2020-R-0076) under the revised February 5, 2018, FHWA, FRA, FTA Programmatic Biological Opinion for Transportation Projects within the Range of the Indiana Bat and Northern Long-eared Bat.

To whom it may concern:

The U.S. Fish and Wildlife Service (Service) has received your request dated to verify that the **Benning Road and Bridge Transportation Improvements Environmental Assessment** (Proposed Action) may rely on the revised February 5, 2018, FHWA, FRA, FTA Programmatic Biological Opinion for Transportation Projects within the Range of the Indiana Bat and Northern Long-eared Bat (PBO) to satisfy requirements under Section 7(a)(2) of the Endangered Species Act of 1973 (ESA) (87 Stat.884, as amended; 16 U.S.C. 1531 *et seq.*).

Based on the information you provided (Project Description shown below), you have determined that the Proposed Action will have **no effect** on the endangered Indiana bat (*Myotis sodalis*) or the threatened Northern long-eared bat (*Myotis septentrionalis*). If the Proposed Action is not modified, **no consultation is required for these two species**.

For Proposed Actions that include bridge/structure removal, replacement, and/or maintenance activities: If your initial bridge/structure assessments failed to detect Indiana bats, but you later detect bats during construction, please submit the Post Assessment Discovery of Bats at Bridge/Structure Form (User Guide Appendix E) to this Service Office. In these instances, potential incidental take of Indiana bats may be exempted provided that the take is reported to the Service.

If the Proposed Action may affect any other federally-listed or proposed species and/or designated critical habitat, additional consultation between the lead Federal action agency and this Service Office is required. If the proposed action has the potential to take bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act

10/16/2019

IPaC Record Locator: 103-18727343

2

may also be required. In either of these circumstances, please advise the lead Federal action agency for the Proposed Action accordingly.

10/16/2019

IPaC Record Locator: 103-18727343

3

Project Description

The following project name and description was collected in IPaC as part of the endangered species review process.

Name

Benning Road and Bridge Transportation Improvements Environmental Assessment

Description

The proposed project involves extending the DC Streetcar along Benning Road from its existing eastern terminus to the Benning Metrorail Station. Completing this action will require: widening the existing roadway, construction new streetcar platforms at five locations, installing overhead propulsion wires, constructing two new traction power substations, modifying the deck of the Ethel Kennedy Bridge, and replacing the Whitlock Bridge. Secondary improvements include: widening and extending the existing sidewalk, renovating existing and installing new lighting fixtures, and replacing street trees that will be impacted during construction.

10/16/2019

IPaC Record Locator: 103-18727343

4

Determination Key Result

Based on the information you provided, you have determined that the Proposed Action will have no effect on the endangered Indiana bat and/or the threatened Northern long-eared bat. Therefore, no consultation with the U.S. Fish and Wildlife Service pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended 16 U.S.C. 1531 *et seq.*) is required for these two species.

Qualification Interview

1. Is the project within the range of the Indiana bat^[1]?

[1] See [Indiana bat species profile](#)

Automatically answered

No

2. Is the project within the range of the Northern long-eared bat^[1]?

[1] See [Northern long-eared bat species profile](#)

Automatically answered

Yes

3. Which Federal Agency is the lead for the action?

A) Federal Highway Administration (FHWA)

4. Are *all* project activities limited to non-construction^[1] activities only? (examples of non-construction activities include: bridge/abandoned structure assessments, surveys, planning and technical studies, property inspections, and property sales)

[1] Construction refers to activities involving ground disturbance, percussive noise, and/or lighting.

No

5. Does the project include *any* activities that are **greater than** 300 feet from existing road/rail surfaces^[1]?

[1] Road surface is defined as the actively used [e.g. motorized vehicles] driving surface and shoulders [may be pavement, gravel, etc.] and rail surface is defined as the edge of the actively used rail ballast.

No

10/16/2019

IPaC Record Locator: 103-18727343

5

6. Does the project include *any* activities **within** 0.5 miles of a known Indiana bat and/or NLEB hibernaculum^[1]?

[1] For the purpose of this consultation, a hibernaculum is a site, most often a cave or mine, where bats hibernate during the winter (see suitable habitat), but could also include bridges and structures if bats are found to be hibernating there during the winter.

No

7. Is the project located **within** a karst area?

No

8. Is there *any* suitable^[1] summer habitat for Indiana Bat or NLEB **within** the project action area^[2]? (includes any trees suitable for maternity, roosting, foraging, or travelling habitat)

[1] See the Service's [summer survey guidance](#) for our current definitions of suitable habitat.

[2] The action area is defined as all areas to be affected directly or indirectly by the Federal action and not merely the immediate area involved in the action (50 CFR Section 402.02). Further clarification is provided by the [national consultation FAQs](#).

No

9. Does the project include maintenance of the surrounding landscape at existing facilities (e.g., rest areas, stormwater detention basins)?

No

10. Does the project include wetland or stream protection activities associated with compensatory wetland mitigation?

No

11. Does the project include slash pile burning?

No

12. Does the project include *any* bridge removal, replacement, and/or maintenance activities (e.g., any bridge repair, retrofit, maintenance, and/or rehabilitation work)?

Yes

13. Is there *any* suitable habitat^[1] for Indiana bat or NLEB **within** 1,000 feet of the bridge? (includes any trees suitable for maternity, roosting, foraging, or travelling habitat)

[1] See the Service's current [summer survey guidance](#) for our current definitions of suitable habitat.

No

10/16/2019

IPaC Record Locator: 103-18727343

6

14. Does the project include the removal, replacement, and/or maintenance of *any* structure other than a bridge? (e.g., rest areas, offices, sheds, outbuildings, barns, parking garages, etc.)

No

15. Will the project involve the use of **temporary** lighting *during* the active season?

Yes

16. Is there *any* suitable habitat **within** 1,000 feet of the location(s) where **temporary** lighting will be used?

No

17. Will the project install new or replace existing **permanent** lighting?

Yes

18. Is there *any* suitable habitat **within** 1,000 feet of the location(s) where **permanent** lighting will be installed or replaced?

No

19. Are *all* project activities that are **not associated with** habitat removal, tree removal/trimming, bridge and/or structure activities, temporary or permanent lighting, or use of percussives, limited to actions that DO NOT cause any additional stressors to the bat species?

Examples: lining roadways, unlighted signage , rail road crossing signals, signal lighting, and minor road repair such as asphalt fill of potholes, etc.

Yes

20. Will the project raise the road profile **above the tree canopy**?

No

21. Is the location of this project consistent with a No Effect determination in this key?

Automatically answered

Yes, because the project action area not within suitable Indiana bat and/or NLEB summer habitat and is outside of 0.5 miles of a hibernaculum.

22. Is the bridge removal, replacement, or maintenance activities portion of this project consistent with a No Effect determination in this key?

Automatically answered

Yes, because the bridge is more than 1,000 feet from the nearest suitable habitat and is therefore considered unsuitable for use by bats

10/16/2019

IPaC Record Locator: 103-18727343

7

23. Is the temporary lighting portion of this project consistent with a No Effect determination in this key?

Automatically answered

Yes, because the lighting will be more than 1,000 feet from the nearest suitable habitat

24. Is the permanent lighting portion of this project consistent with a No Effect determination in this key?

Automatically answered

Yes, because the lighting will be more than 1,000 feet from the nearest suitable habitat

10/16/2019

IPaC Record Locator: 103-18727343

8

Determination Key Description: FHWA, FRA, FTA Programmatic Consultation For Transportation Projects Affecting NLEB Or Indiana Bat

This key was last updated in IPaC on March 16, 2018. Keys are subject to periodic revision.

This decision key is intended for projects/activities funded or authorized by the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), and/or Federal Transit Administration (FTA), which require consultation with the U.S. Fish and Wildlife Service (Service) under Section 7 of the Endangered Species Act (ESA) for the endangered **Indiana bat** (*Myotis sodalis*) and the threatened **Northern long-eared bat** (NLEB) (*Myotis septentrionalis*).

This decision key should only be used to verify project applicability with the Service's [February 5, 2018, FHWA, FRA, FTA Programmatic Biological Opinion for Transportation Projects](#). The programmatic biological opinion covers limited transportation activities that may affect either bat species, and addresses situations that are both likely and not likely to adversely affect either bat species. This decision key will assist in identifying the effect of a specific project/activity and applicability of the programmatic consultation. The programmatic biological opinion is not intended to cover all types of transportation actions. Activities outside the scope of the programmatic biological opinion, or that may affect ESA-listed species other than the Indiana bat or NLEB, or any designated critical habitat, may require additional ESA Section 7 consultation.

IPaC Information for Planning and Consultation U.S. Fish & Wildlife Service

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

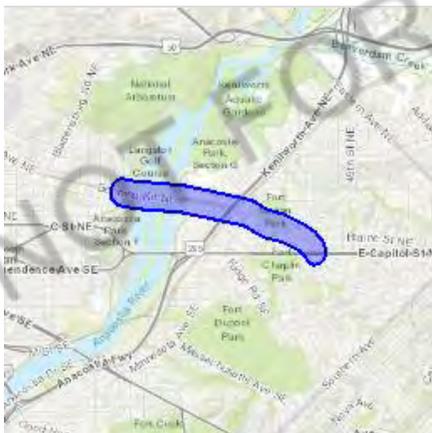
Project information

NAME

Benning Road and Bridge Transportation Improvements Environmental Assessment

LOCATION

District of Columbia County, District of Columbia



DESCRIPTION

The

proposed project involves extending the DC Streetcar along Benning Road from its existing eastern terminus to the Benning Metrorail Station. Completing this action will require: widening the existing roadway, construction new streetcar platforms at five locations, installing overhead propulsion wires, constructing two new traction power substations, modifying the deck of the Ethel Kennedy Bridge, and replacing the Whitlock Bridge. Secondary improvements include: widening and extending the existing sidewalk, renovating existing and installing

new lighting fixtures, and replacing street trees that will be impacted during construction.

Local office

Chesapeake Bay Ecological Services Field Office

☎ (410) 573-4599 

📠 (410) 266-9127 

177 Admiral Cochrane Drive
Annapolis, MD 21401-7307

<http://www.fws.gov/chesapeakebay/>

<http://www.fws.gov/chesapeakebay/endsppweb/ProjectReview/Index.html>

NOT FOR CONSULTATION

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Log in to IPaC.
2. Go to your My Projects list.
3. Click PROJECT HOME for this project.
4. Click REQUEST SPECIES LIST.

Listed species

¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

-
1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information.
 2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> This species only needs to be considered if the following condition applies: <ul style="list-style-type: none">Projects with a federal nexus that have tree clearing = to or > 15 acres: 1. REQUEST A SPECIES LIST 2. NEXT STEP: EVALUATE DETERMINATION KEYS 3. SELECT EVALUATE under the Northern Long-Eared Bat (NLEB) Consultation and 4(d) Rule Consistency key No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/9045	Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act

¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This

is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)
<p>Bald Eagle <i>Haliaeetus leucocephalus</i></p> <p>This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.</p> <p>https://ecos.fws.gov/ecp/species/1626</p>	<p>Breeds Oct 15 to Aug 31</p>
<p>Black-billed Cuckoo <i>Coccyzus erythrophthalmus</i></p> <p>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p> <p>https://ecos.fws.gov/ecp/species/9399</p>	<p>Breeds May 15 to Oct 10</p>
<p>Bobolink <i>Dolichonyx oryzivorus</i></p> <p>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	<p>Breeds May 20 to Jul 31</p>
<p>Canada Warbler <i>Cardellina canadensis</i></p> <p>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	<p>Breeds May 20 to Aug 10</p>

<p>Cerulean Warbler <i>Dendroica cerulea</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/2974</p>	Breeds Apr 29 to Jul 20
<p>Dunlin <i>Calidris alpina arctica</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA</p>	Breeds elsewhere
<p>Eastern Whip-poor-will <i>Antrostomus vociferus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds May 1 to Aug 20
<p>Golden Eagle <i>Aquila chrysaetos</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680</p>	Breeds elsewhere
<p>Golden-winged Warbler <i>Vermivora chrysoptera</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8745</p>	Breeds May 1 to Jul 20
<p>Kentucky Warbler <i>Oporornis formosus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds Apr 20 to Aug 20
<p>Least Tern <i>Sterna antillarum</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA</p>	Breeds Apr 20 to Sep 10
<p>Lesser Yellowlegs <i>Tringa flavipes</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679</p>	Breeds elsewhere
<p>Nelson's Sparrow <i>Ammodramus nelsoni</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds May 15 to Sep 5
<p>Prairie Warbler <i>Dendroica discolor</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds May 1 to Jul 31

Prothonotary Warbler <i>Protonotaria citrea</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 1 to Jul 31
Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Sep 10
Red-throated Loon <i>Gavia stellata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Ruddy Turnstone <i>Arenaria interpres morinella</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds elsewhere
Rusty Blackbird <i>Euphagus carolinus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Semipalmated Sandpiper <i>Calidris pusilla</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Short-billed Dowitcher <i>Limnodromus griseus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9480	Breeds elsewhere
Snowy Owl <i>Bubo scandiacus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Whimbrel <i>Numenius phaeopus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9483	Breeds elsewhere
Willet <i>Tringa semipalmata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 20 to Aug 5
Wood Thrush <i>Hylocichla mustelina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Aug 31

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Golden Eagle
Non-BCC Vulnerable
(This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)

Golden-winged Warbler
BCC Rangwide (CON)
(This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Kentucky Warbler
BCC Rangwide (CON)
(This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Least Tern
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)

Lesser Yellowlegs
BCC Rangwide (CON)
(This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

SPECIES JAN FEB MAR APR MAY JUN JUL AUG SEP OCT NOV DEC

Nelson's Sparrow
BCC Rangwide (CON)
(This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Prairie Warbler
BCC Rangwide (CON)
(This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) and/or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review.

Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

WETLAND INFORMATION IS NOT AVAILABLE AT THIS TIME

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the [NWI map](#) to view wetlands at this location.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

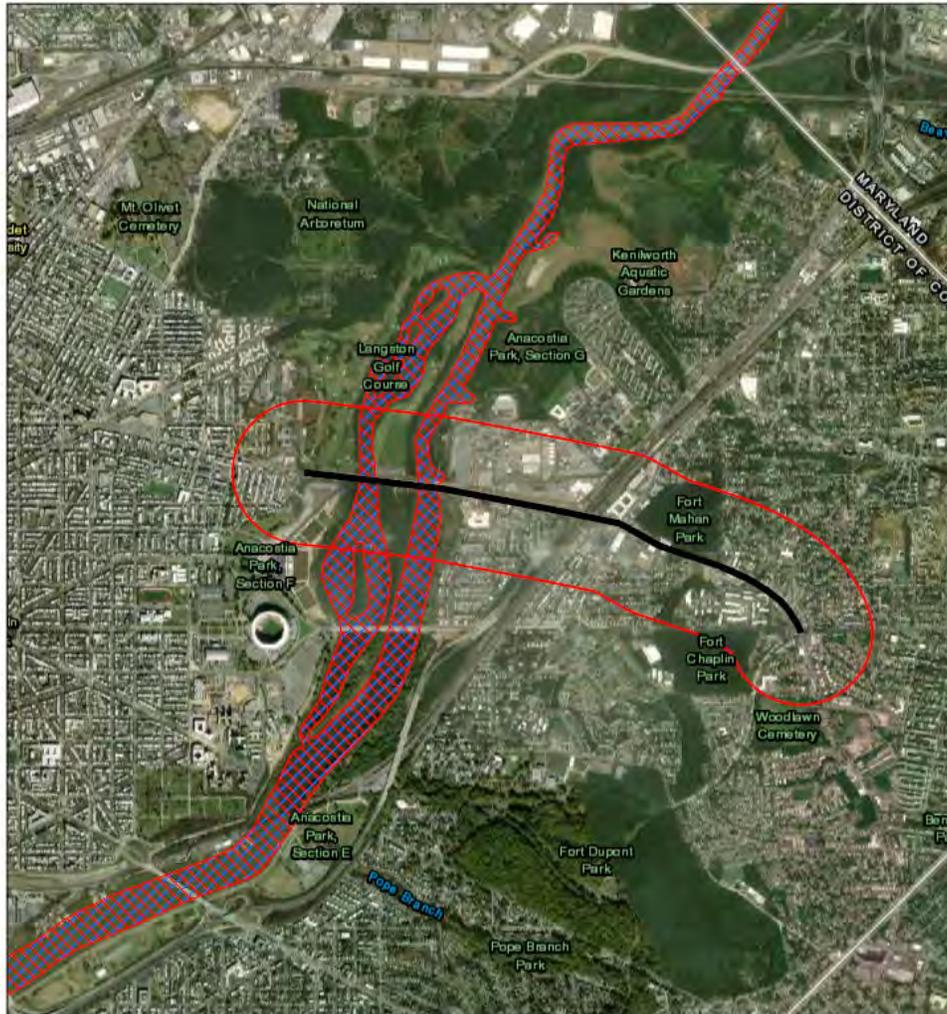


Drawn Action Area & Overlapping S7 Consultation Areas

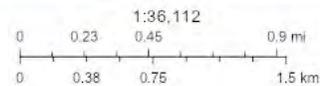
Area of Interest (AOI) Information

Area : 728.52 acres

Jul 14 2020 11:36:17 Eastern Daylight Time



-  Atlantic Sturgeon
-  Shortnose Sturgeon



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community

Summary

Name	Count	Area(acres)	Length(mi)
Atlantic Sturgeon	7	330.39	N/A
Shortnose Sturgeon	4	188.80	N/A
Atlantic Salmon	0	0	N/A
Sea Turtles	0	0	N/A
Atlantic Large Whales	0	0	N/A
In or Near Critical Habitat	0	0	N/A

Atlantic Sturgeon

#	Feature ID	Species	Life Stage	Behavior	Zone
1	ANS_POT_JUV_MAF	Atlantic sturgeon	Juvenile	Migrating & Foraging	Potomac River
2	ANS_POT_PYL_MAF	Atlantic sturgeon	Post Yolk-sac Larvae	Migrating & Foraging	Potomac River
3	ANS_POT_SUB_MAF	Atlantic sturgeon	Subadult	Migrating & Foraging	Potomac River
4	ANS_POT_YOY_MAF	Atlantic sturgeon	Young of year	Migrating & Foraging	Potomac River
5	ANS_POT_ADU_MAF	Atlantic sturgeon	Adult	Migrating & Foraging	Potomac River
6	ANS_POT_ADU_SPN	Atlantic sturgeon	Adult	Spawning	Potomac River
7	ANS_POT_EYL_NON	Atlantic sturgeon	Eggs and Yolk-sac Larvae	N/A	Potomac River

#	From	Until	From (2)	Until (2)	Area(acres)
1	01/01	12/31	N/A	N/A	47.20
2	03/15	07/15	8/1	1/31	47.20
3	03/15	11/30	N/A	N/A	47.20
4	01/01	12/31	N/A	N/A	47.20
5	03/15	11/30	N/A	N/A	47.20
6	03/15	05/15	8/1	11/30	47.20
7	03/15	06/15	8/1	12/31	47.20

Shortnose Sturgeon

#	Feature ID	Species	Life Stage	Behavior	Zone
1	SNS_POT_YOY_MAF	Shortnose sturgeon	Young of year	Migrating & Foraging	Potomac River
2	SNS_POT_JUV_MAF	Shortnose sturgeon	Juvenile	Migrating & Foraging	Potomac River
3	SNS_POT_PYL_MAF	Shortnose sturgeon	Post Yolk-sac Larvae	Migrating & Foraging	Potomac River
4	SNS_POT_ADU_MAF	Shortnose sturgeon	Adult	Migrating & Foraging	Potomac River

#	From	Until	From (2)	Until (2)	Area(acres)
1	01/01	12/31	N/A	N/A	47.20
2	01/01	12/31	N/A	N/A	47.20
3	03/15	6/30	N/A	N/A	47.20
4	01/01	12/31	N/A	N/A	47.20

DISCLAIMER: Use of this App does NOT replace the Endangered Species Act (ESA) Section 7 consultation process; it is a first step in determining if a proposed Federal action overlaps with listed species or critical habitat presence. Because the data provided through this App are updated regularly, reporting results must include the date they were generated. The report outputs (map/tables) depend on the options picked by the user, including the shape and size of the action area drawn, the layers marked as visible or selectable, and the buffer distance specified when using the "Draw your Action Area" function. Area calculations represent the size of overlap between the user-drawn Area of Interest (with buffer) and the specified S7 Consultation Area. Summary table areas represent the sum of these overlapping areas for each species group.

Government of the District of Columbia
Department of Transportation



July 16th, 2020

Ms. Jennifer Anderson
Protected Resources Divisions
NOAA Fisheries
55 Great Republic Drive
NOAA Fisheries Services
Gloucester, MA 01930

RE: Benning Road & Bridges Transportation Improvements Project, Washington D.C.

Dear Ms. Anderson:

The District Department of Transportation (DDOT), in conjunction with the Federal Highway Administration (FHWA), is preparing a final Environmental Assessment (EA) for the proposed Benning Road and Bridges Transportation Improvements project (the proposed action) in northeast Washington, DC. The EA is being prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations (40 CFR 1500-1508), FHWA's Environmental Impact and Related Procedures (23 CFR 771), FHWA's Technical Advisory Guidance for Preparing and Processing Environmental and Section 4(f) Documents (T6640.8A), FHWA's 2006 SAFETEA-LU Environmental Review Process: Final Guidance, Appendix A of 23 CFR part 450 titled Linking Transportation Planning and NEPA Processes, FTA's 2006 Transit Noise and Vibration Impact Assessment guidance, FHWA's Noise Regulations (23 CFR 772), and DDOT's Environmental Process Manual. DDOT and FHWA are sponsoring the proposed project as described below. The purpose of this letter is to request Endangered Species Act (ESA) concurrence from your office for the Benning Road & Bridges Transportation Improvements Project. The action's Preferred Alternative involves modifying the superstructure of the bridges which carry Benning Road over Kingman Lake and the Anacostia River, in Washington D.C. The ESA Section 7 Mapper indicates that both waterbodies may be inhabited by the federally endangered Atlantic and Shortnose sturgeons (*Acipenser oxyrinchus oxyrinchus* and *Acipenser brevirostrum*).¹ Using the NOAA project review guidelines, we have made preliminary determination that the proposed activity may affect, but is not likely to adversely affect, these species or any other listed as threatened or endangered by NMFS under the ESA of 1973, as amended. Our supporting analysis is provided below.

Proposed Project

Purpose & Need

The purpose of the Benning Road and Bridges Transportation Improvements project is to address deficiencies in transportation infrastructure conditions, improve safety conditions and operations for both motorized and non-motorized access, and to provide for increased mobility and accessibility between the intersection of Benning Road, and Oklahoma Avenue and the Benning Road Metrorail Station.

¹ *ESA Section 7 Mapper*. (2019, November). NOAA Fisheries. Retrieved July 6, 2020, from <https://noaa.maps.arcgis.com/apps/webappviewer/index.html?id=1bc332edc5204e03b250ac11f9914a27>

Project Study Area

The Benning Road and Bridges Transportation Improvements Project is focused on the section of Benning Road between Oklahoma Avenue and the Benning Road Metro Station, in Washington, D.C. This segment is approximately two miles long (see Figure 1) The study area is the geographic area within one-quarter mile of Benning Road between and around the western and eastern termini. The crossing of the Anacostia River and Kingman Lake is located at approximately 38° 53' 49.40" N by 76° 57' 43.47" W.

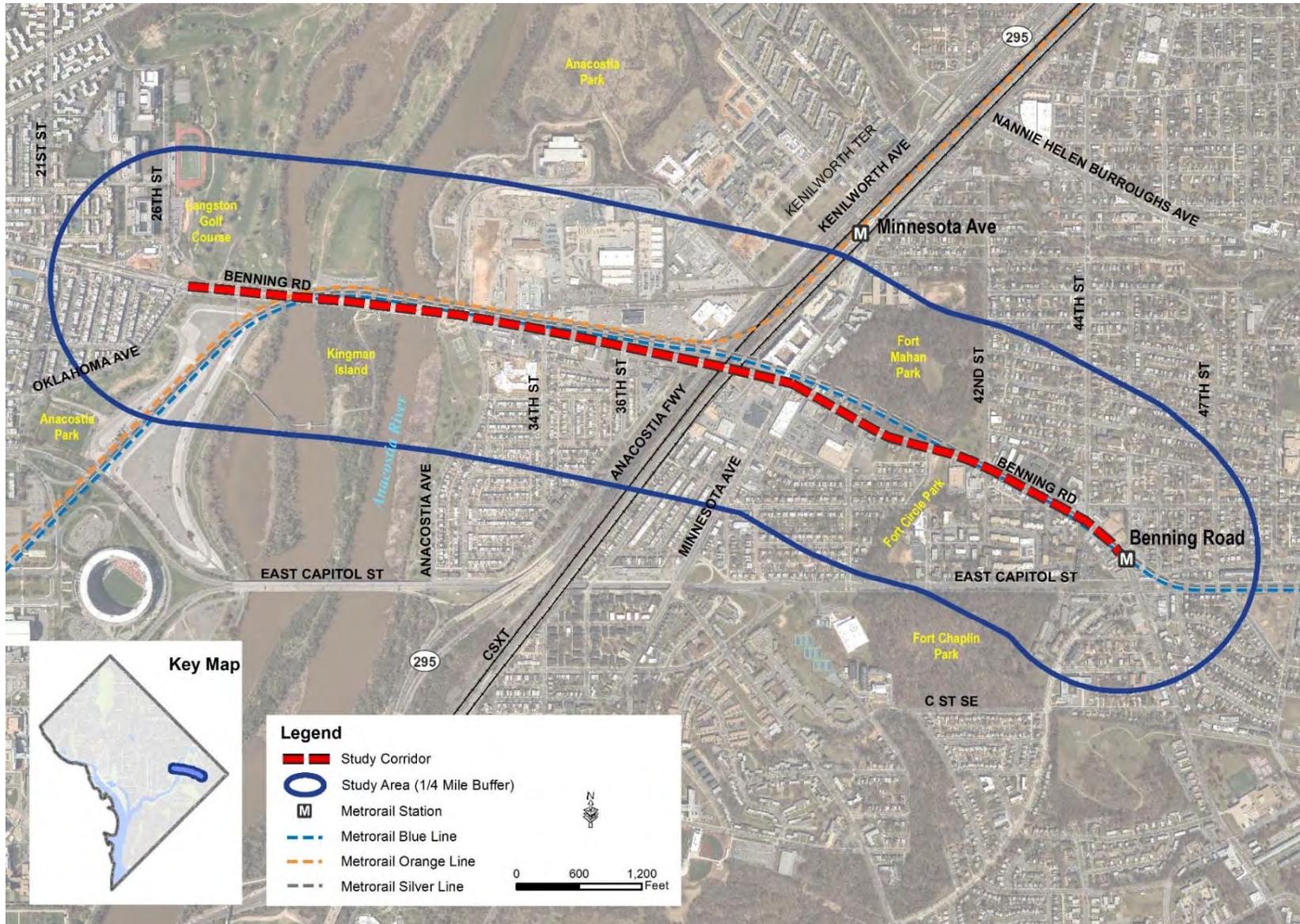
Proposed Activities

Streetcar and Roadway Improvements

The Preferred Alternative would provide an 11- to 12-foot wide, median shared streetcar lane for the length of the Benning Road corridor and new pedestrian, bicycle, and safety improvements. Streetcar tracks would be provided in the inside lane adjacent to the median. The Preferred Alternative would include facilities and structures required for the streetcar operations such as traction power substations (TPSS), wired propulsion equipment (*i.e.* overhead wire and support poles) and streetcar stop platforms (see Figure 2). Figure 3 provides an illustration of how the typical section of Benning Road would be under the build condition.

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Figure 1. Project Study Area



Source: Benning Road and Bridges Transportation Improvements Final Environmental Assessment

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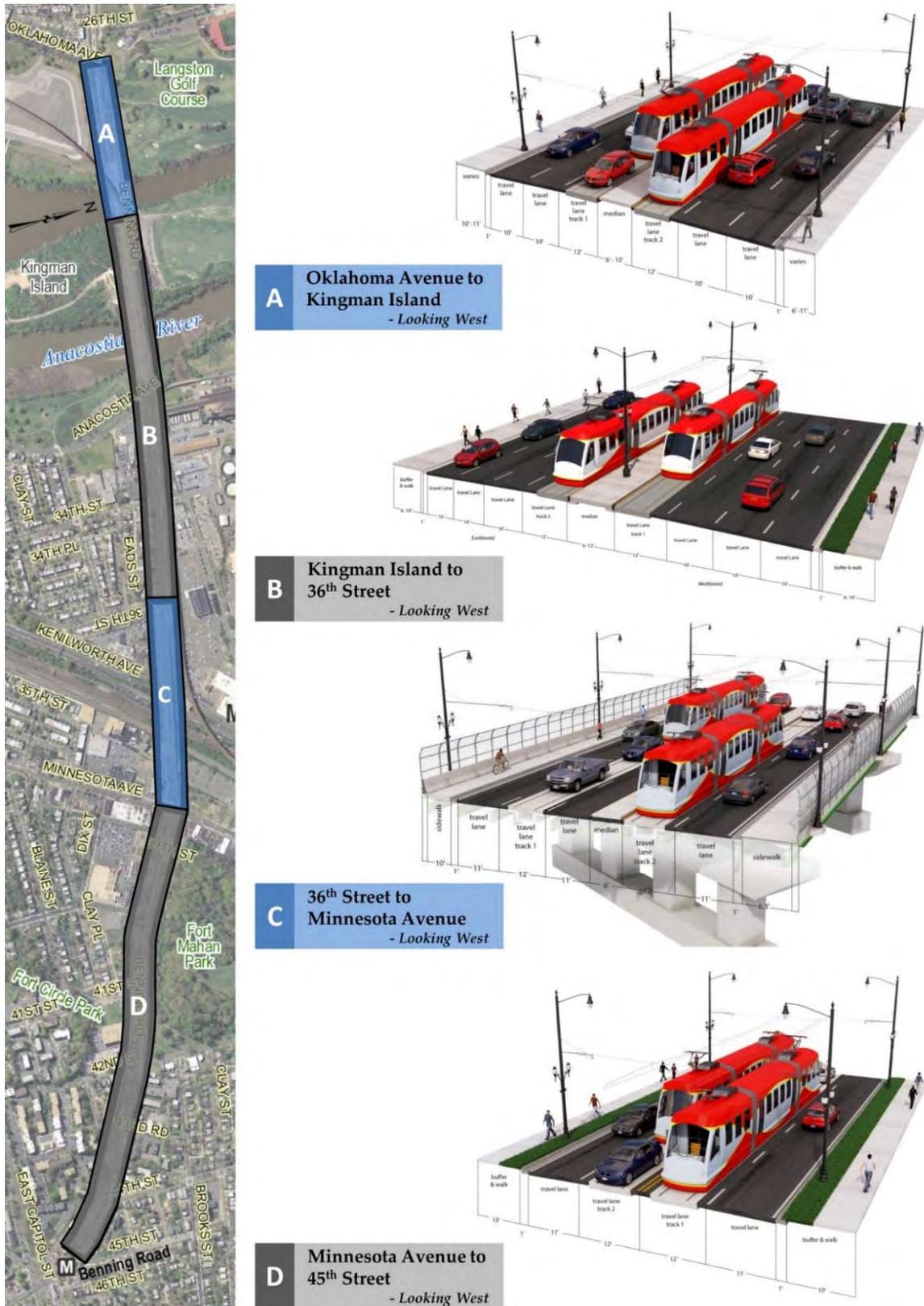
Figure 2. Proposed Streetcar Stops



Source: Benning Road and Bridges Transportation Improvements Final Environmental Assessment

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Figure 3. Preferred Alternative Typical Sections



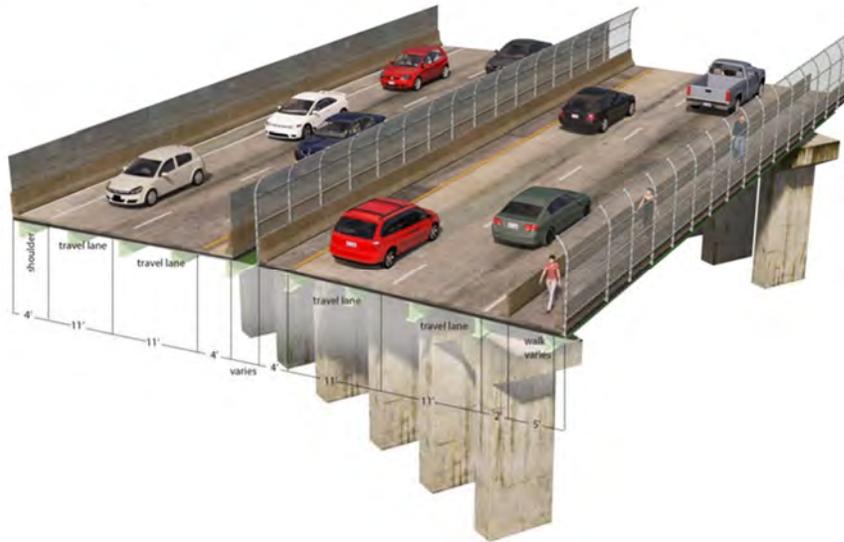
Source: Benning Road and Bridges Transportation Improvements Final Environmental Assessment

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Bridge Improvements

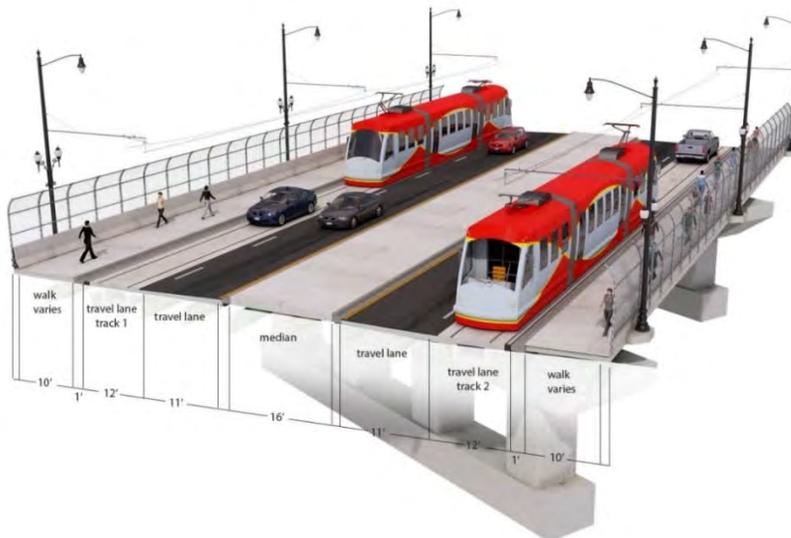
The Preferred Alternative recommends replacing the Lorraine H. Whitlock Bridge and modifying the bridges which carry Benning Road over Kingman Lake and the Anacostia River (the Ethel B. Kennedy Bridge). The Whitlock Bridge is comprised of two structures which convey Benning Road over DC 295 (Anacostia Freeway) and a CSX rail line. Inspection reports prepared for the Whitlock Bridge by DDOT in 2012 found the substructure of the bridges to be in fair to poor condition (see Figure 4). The new structure(s) would replace the existing piers, abutments, superstructure, and deck. The new east abutment would be relocated approximately 45 feet east of its existing location (see Figure 5).

Figure 4. Existing Whitlock Bridge (looking east)



Source: Benning Road and Bridges Transportation Improvements Final Environmental Assessment

Figure 5. Proposed Whitlock Bridge Improvements (looking east)



Source: Benning Road and Bridges Transportation Improvements Final Environmental Assessment

The Ethel B. Kennedy Bridge over Kingman Lake and Anacostia River are both composed of single structures which currently bear eight travel lanes (four in each direction) and sidewalks. The proposed extension of the streetcar along Benning Road requires modifying the superstructure of both bridges (see Sections A and B in Figure 3). The scope of improvements includes: removing portions of the deck, reinforcing the girders, restoring the deck, and installing the streetcar tracks and overhead appurtenances. Based on this scope, all work on both bridges is expected to occur from the bridge surface.

Streetcar Propulsion Systems

DDOT's Preferred Alternative recommends the use of a wired population system to energize the proposed extension of the Benning Road Streetcar line. This system is comprised of two elements: an overhead wire contact system (known as a catenary) which delivers electricity to the streetcar vehicles, and two traction power substation (TPSS). A TPSS consists of a fenced area approximately 30 feet by 60 feet within which is a structure that houses electrical equipment. One location is on the east side of DC-295 and the CSX railroad tracks under the bridge structure on DDOT owned property; the second location is on WMATA's Benning Road Metrorail Station property.

DC Streetcar Car Barn

The Preferred Alternative includes installing a new two-track connection between the DC Streetcar Car Barn Training Center (located at 2550 Benning Road). The two new tracks would be provided along 26th Street and will connect the DC Streetcar Car Barn Training Center to the existing eastbound and westbound streetcar tracks on Benning Road.

Projected Schedule

The construction of Ethel B. Kennedy Bridges over Kingman Lake and Anacostia River is anticipated during 2021-2022. The overall project is estimated to complete during Fall of 2025.

Description of the Action Area

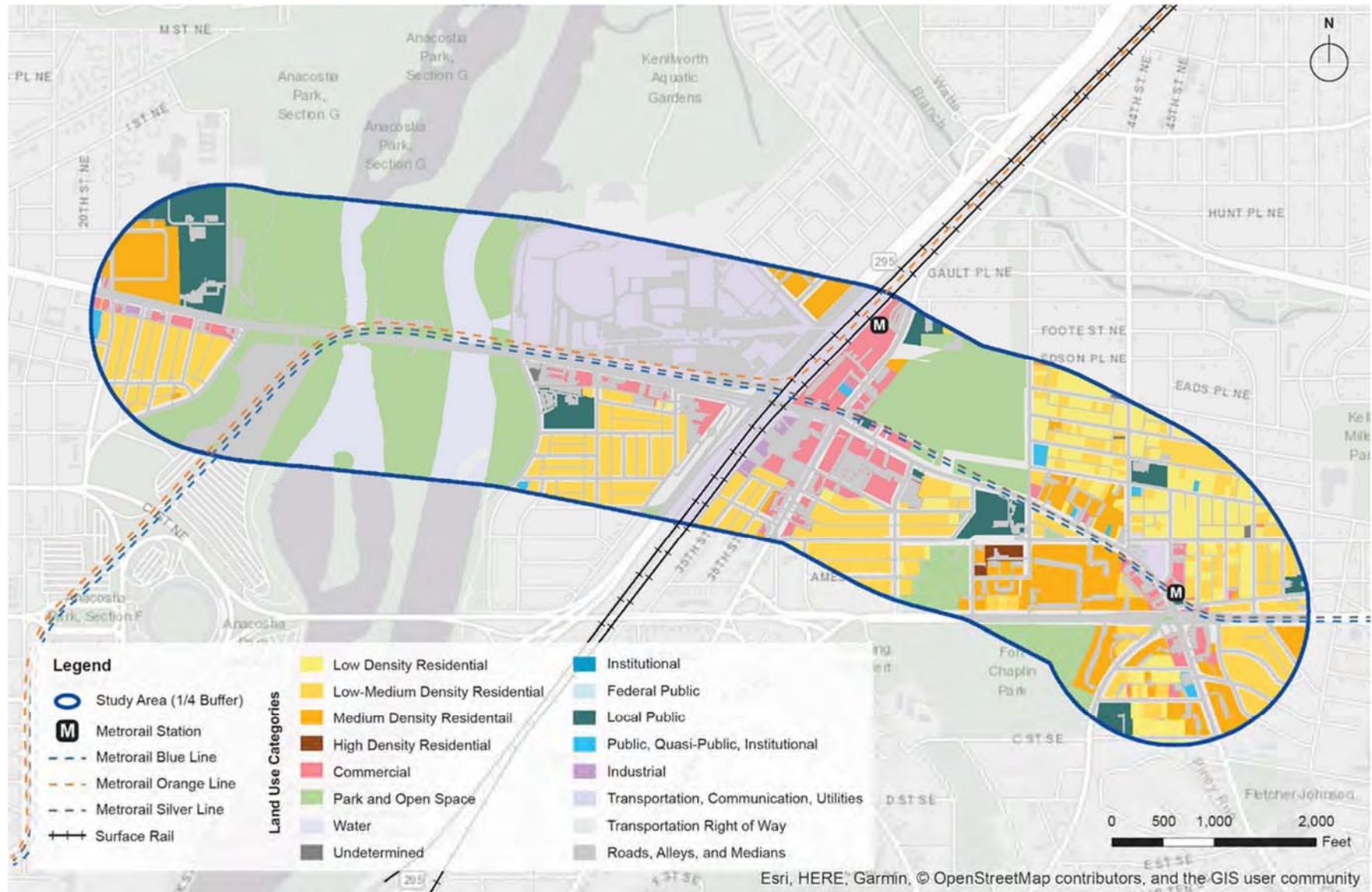
The Benning Road and Bridges Transportation Improvements Project study area encompasses approximately 730 acres (see Figure 6). Most of this area (69%) is comprised of urban land uses (*e.g.* residential, commercial, and industrial). The 31 % of the area (229 acres) that is classified as open spaces is comprised predominately of parks (25% or 184 acres), and open water (6% or 45 acres) (see Figure 7).

Surface Water Resources

Based on the environmental information assembled for the Benning Road and Bridges Transportation Improvements EA, the project study includes a variety of aquatic habitats (see Figure 8). The study area contains three water bodies: the Anacostia River, Kingman Lake, and Piney Run. Piney Run is a stream that courses immediately south of Benning Road roughly paralleling the road's alignment. Piney Run connects to the Anacostia River and has been channelized in sections through the study area. All three water bodies are comprised of freshwater.

The main channel of the Anacostia River (including Kingman Lake) is an estuary, whose water can change by approximately 3 feet over a tidal cycle (MDE, 2012). This tidal effect occurs in the segment included in the study area. According to a biological stressor identification analysis published by the Maryland Department of the Environment (MDE) in 2012, approximately 95% of stream miles in the Anacostia River basin are estimated as having fish and and/or benthic indices of biological integrity in the very poor to poor category (see Table 1). In 2013, the District of Columbia's (DC) Department of Energy and the Environment (DOEE) implemented the Anacostia River Sediment Project (ASRP) to determine the condition of the waterway's sediment. The ASRP's study area extended from the point where the northeast and northwest branches of the Anacostia River meet to its confluence with the Potomac River. The ASRP found that contamination is present in both the shallow and deep sediments. The primary contaminant of concern includes polychlorinated biphenyls (PCBs), pesticides, and dioxins (DC-DOEE, 2020).

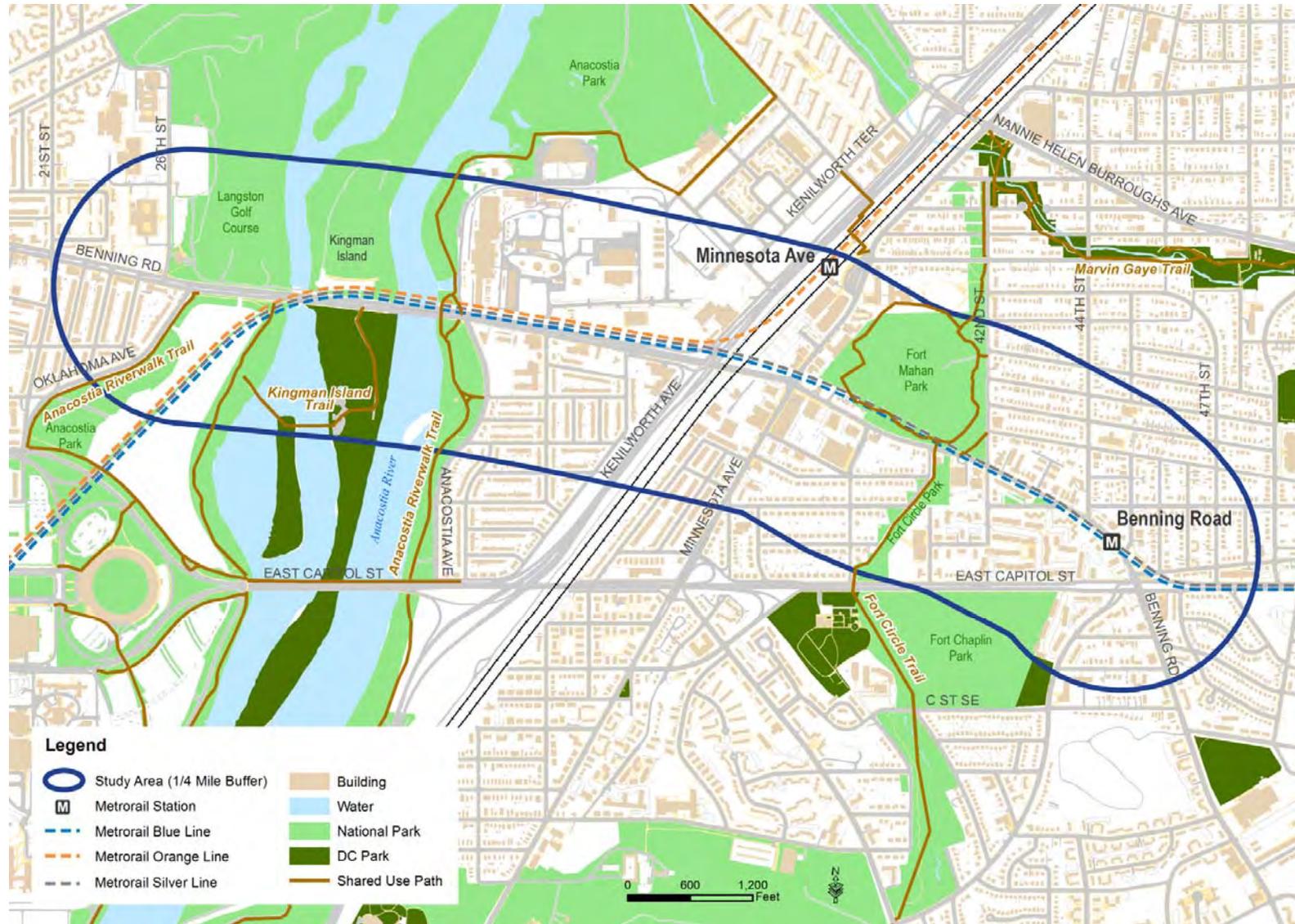
Figure 6. Land Use within the Project Study Area



Source: DC OCTO, Retrieved 2019

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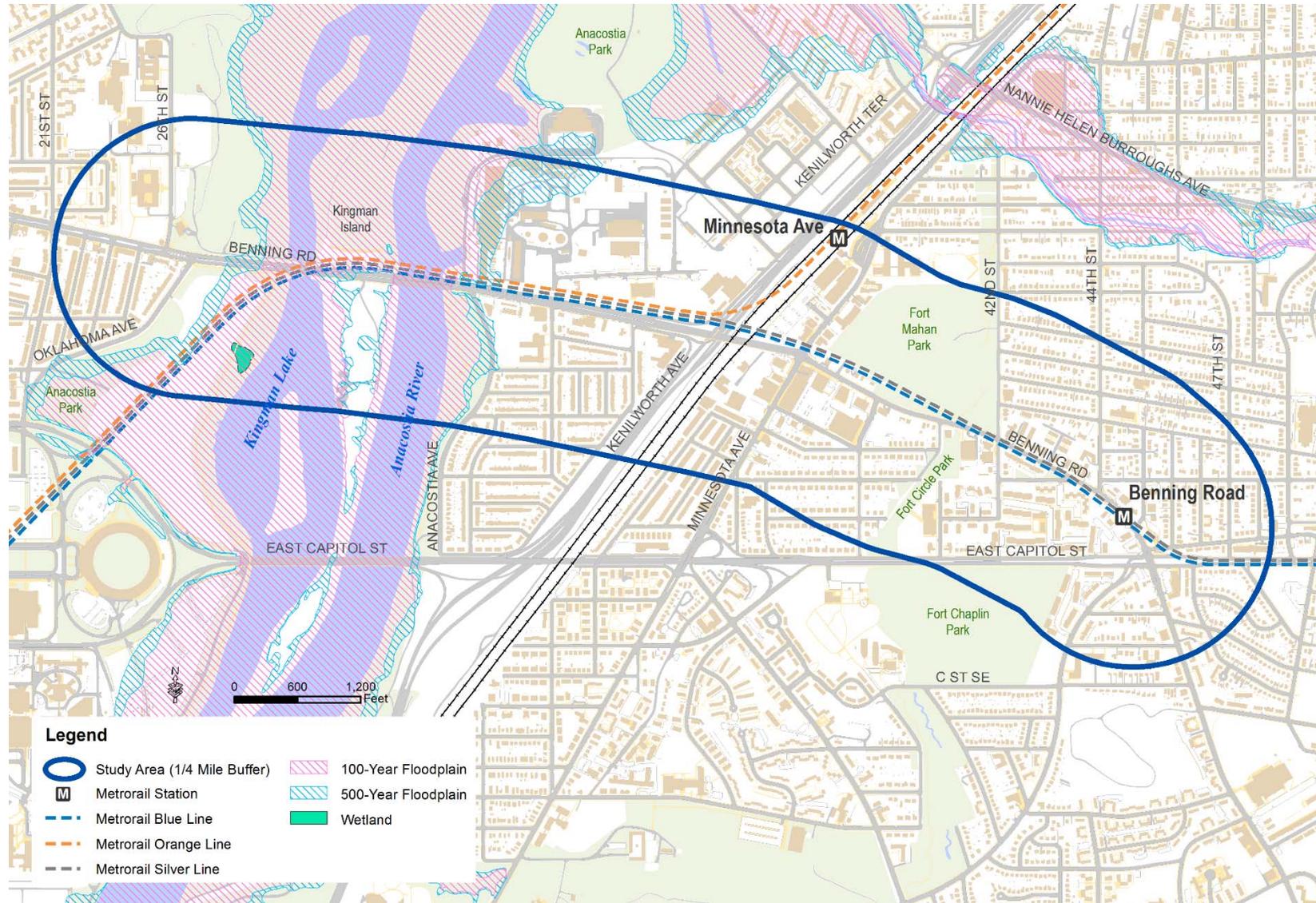
Figure 7. Parks, Recreational Resources, and Trails in the Study Area



Source: DC Data Catalog (<http://data.dc.gov>) and NPS

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Figure 8. Surface Water Resources in the Project Study Area



Source: DCGIS, UFWS, and FEMA retrieved February 2014

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Table 1. Summary of Attribute Risk Values for Stressor Groups for Anacostia River

Stressor Group	Percent of stream miles in watershed with poor to very poor Fish or Benthic IBI impacted by Parameter Group(s) (Attributable Risk)	
Sediment	73%	95%
In-Stream Habitat	69%	
Riparian	26%	
Water Chemistry	78%	

Source: (MDE, 2012)

The list of NWI-identified wetlands includes Riverine, Open Water Tidal, Riverine Tidal, and Palustrine Emergent. In addition, the Anacostia River itself is defined by the NWI as a “Riverine Open Water Tidal wetland.” The NWI does not identify any other wetlands in the study area beyond the vicinity of the Anacostia River. The 100-year flood zones are located around the Anacostia River. The Base Flood Elevation for 100-year flood zones is 14 feet as identified on the DFIRM. The 500-year flood zone areas are also located along the east and west shores of the Anacostia River. Besides the locations around the Anacostia River and Kingman Lake, no other portions of the study area are within 100-year or 500-year flood zones.

NMFS Listed Species and Critical Habitat

The Section 7 ESA Mapper was used to generate a list of federally endangered aquatic species that may be inhabiting the section of the portions of the Anacostia River and Kingman Lake that fall within the project study area. The Mapper identified two species: Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*) and Shortnose sturgeon (*Acipenser brevirostrum*)². The life phases and times of year associated with each species is provided in

Table 2. According to the Atlantic sturgeon Critical Habitat Federal Register Final Rule (82 FR 39160), the sections of Kingman Lake and the Anacostia River which fall within the project study area are not classified as critical habitat.³

Table 2. Federal Endangered Aquatic Species

Species	Life phase	Activity	Time(s) of Year
Atlantic sturgeon (<i>Acipenser oxyrinchus oxyrinchus</i>)	Eggs and Yolk-sac Larvae	N/A	03/15 to 06/15; 08/01 to 12/31
	Post Yolk-sac Larvae	Migrating & Foraging	03/15 to 07/15; 08/01 to 01/31
	Young of Year		01/01 to 12/31
	Juvenile		01/01 to 12/31
	Sub-Adult		03/15 to 11/30
	Adult	Spawning; Migrating & Foraging	03/15 to 05/15; 08/01 to 11/30
shortnose sturgeon (<i>Acipenser brevirostrum</i>)	Post Yolk-sac Larvae	Migrating & Foraging	03/15 to 06/30
	Young of Year		01/01 to 12/31
	Juvenile		01/01 to 12/31
	Adult		01/01 to 12/31

Source: (NOAA, 2020)

Atlantic Sturgeon

The ESA mapper identified six life phases in which Atlantic sturgeon might be utilizing the sections of Kingman Lake and the Anacostia River which fall within the project study area. A brief description of habitat requirements associated with each life phase is provided in Table 3. Atlantic sturgeon are anadromous fish, meaning that migrate between fresh and marine habitats over the course of their lifespan. The spawning grounds tend to be located far enough upstream that the water is fresh. The spawning behavior of Atlantic sturgeon appears to be seasonal but appears to vary by region. From the Chesapeake Bay southward, it appears that Atlantic sturgeon spawn in the late summer and fall (NOAA, 2020). Once hatched, juveniles may stay within their home rivers for up to seven years (Smith &

² The current recovery plan for the Atlantic Sturgeon is located here: 77 FR 5880 and 77 FR 5914(3); The current recovery plan for the shortnose sturgeon is located here: 32 FR 4001; Recovery plan: NMFS 1998a

³ *Atlantic Sturgeon Critical Habitat Map and GIS Data* (2019, October 18). NOAA Fisheries. Retrieved July 6, 2020, from <https://www.fisheries.noaa.gov/resource/map/atlantic-sturgeon-critical-habitat-map-and-gis-data>

Clugston, 1996). During all life phases, Atlantic sturgeon forage in the stream or ocean bottom. Juvenile individuals feed of aquatic insects, while the diet of adults include mollusks, gastropods, amphipods, isopods, and other fish (New York Natural Heritage Program, 2019).

Table 3. Habitats of the Atlantic Sturgeon by Life Phase

Life Phase	Habitat Description
Eggs and Yolk-sac Larvae (Spawning Areas)	Spawning occurs in freshwater portions of estuaries and large river tributaries along Atlantic Coast. The water must be well oxygenated water and the substrate should be clean, with cobble/gravel (64 mm to 250 mm) being ideal
Post Yolk-sac Larvae	Nurseries occur in freshwater portions of estuaries and large river tributaries along Atlantic Coast. Hard substrate and crevices provide cover for larvae. The habitat should support a macroinvertebrate prey community
Young of Year	Individuals at this stage inhabit freshwater and some low-salinity portions of estuaries and large river tributaries along Atlantic Coast. Hard substrate and crevices still provide important refuges from predators. Water temperatures should generally be below 28° C and oxygen levels above 60% (4.3 mg/L to 4.7 mg/L at 22°C to 27°C). Salinities range between 8 and 15 ppt.
Juvenile	Individuals at this stage will transition further downstream towards more brackish environments.
Sub-Adult	Individuals at this stage commonly inhabit the mouths of estuaries, such as the Chesapeake and Narragansett Bays. In these locations, the substrate is typically composed of sand and gravel and the water is shallow (less than 60 m deep).
Adult	Individuals at this stage tend to inhabit shallow inshore areas of the Continental Shelf. During spawning, however, they will migrate back up river to the freshwater nurseries.

Sources: (Atlantic States Marine Fisheries Commission, 2012)

Shortnose Sturgeon

The ESA mapper identified four life phases in which shortnose sturgeon might be utilizing the sections of Kingman Lake and the Anacostia River which fall within the project study area. A brief description of habitat requirements associated with each life phase is provided in Table 4. Shortnose sturgeon are amphidromous fish, meaning that they regularly migrate between freshwater and marine habitats, but not for the purpose of breeding, as in anadromous and catadromous species (NOAA, 2020). Spawning occurs in far upstream segments of river systems (O'Herron, Able, & Hastings, 1993). The spawning period lasts from late winter to mid spring; during this period water temperatures range from about 9° C to 15° C (Dadswell, 1979). The substrate found in spawning sites tends to be composed of: gravel, cobble, and large rocks (Kynard, 1997); and pebble, gravel, cobble, woody debris, and sand (Gibbons & Post, 2009). As noted for the Atlantic sturgeon, the presence of cavities in the substrate is believed to be an important component of larval predator-avoidance behavior.

Table 4. Habitats of the Shortnose Sturgeon by Life Phase

Life Phase	Habitat Description
Post Yolk-sac Larvae	Spawning occurs in far upstream portions of freshwater rivers and streams connected to the Atlantic Ocean. The substrate tends to be composed clean gravel and large pieces of rock or woody debris which can provide refuge for larvae.
Young-of-Year	Individuals in this life phase tend to reside in the bottom of the channel, foraging for macroinvertebrates.
Juvenile	Individuals in these life phases tend to reside in the bottom of the channel, foraging for crustaceans and mollusks. Unlike Atlantic sturgeon, adult shortnose sturgeon infrequently leave their home estuaries for marine habitats.
Adult	

Sources: (Kynard, Atcheson, Kieffer, & Mangold, 2009)

Short downstream movement of larvae is believed to start as early as 9 to 16 days post hatch (Kynard, 1997). In the Hudson River, shortnose sturgeon larvae were associated with deep waters and strong currents (Bain, 1997). Year-of-young, most likely reside in these deep channel locations until they encounter adults completing their yearly migration (Kynard, 1997). Shortnose sturgeon forage along the bottoms of the waterbodies they inhabit; juveniles feed on insects and crustaceans while adults feed predominately on mollusks (NMFS, 1987). Juvenile and adult Shortnose sturgeon have been shown to use limited and distinct home ranges, typically in reaches of curves and runs with islands (Kynard, 1997). In the Potomac River, the shortnose sturgeon were documented wintering in the interface between freshwater-saltwater interface area and the tidal freshwater river (Kynard, Atcheson, Kieffer, & Mangold, 2009).

Vegetation

Tracts of natural vegetation occur along the banks of the Anacostia River and in Fort Mahan Park. Along the Anacostia River, NPS vegetation surveys (completed for the *Anacostia Riverwalk Trail EA* in 2011) found mid-successional Sycamore/Green Ash/Box Elder/Silver Maple forest association is the dominant plant community, consisting of common species: American sycamore (*Platanus occidentalis*), silver maple (*Acer saccharinum*), box elder (*Acer negundo*), green ash (*Fraxinus pennsylvanica*), black cherry (*Prunus serotina*), and red maple (*Acer rubrum*), with occurrences of elm (*Ulmus sp.*), hickory (*Carya sp.*), oaks (*Quercus spp.*), tree of heaven (*Ailanthus altissima*), tulip poplar, (*Liriodendron tulipifera*), persimmon (*Diospyros virginiana*) and Eastern cottonwood (*Populus deltoides*) and white mulberry (*Morus alba*). Areas of upland forest are dominated by plant species including red mulberry (*Morus rubra*), black locust (*Robinia pseudoacacia*), willow oak (*Quercus phellos*), princess tree (*Paulownia tomentosa*), northern catalpa (*Catalpa speciosa*), silk tree (*Albizia julibrissin*), and slippery elm (*Ulmus rubra*).

Invasive vegetative species identified by NPS (and in the NPS invasive plant species publication) include poison ivy (*Toxicodendron radicans*), bush honeysuckle (*Lonicera sp.*), tree of heaven (*Ailanthus altissima*), white mulberry (*Morus alba*), Japanese Knotweed (*Fallopia japonica*), princess tree (*Paulownia tomentosa*), silk tree (*Albizia julibrissin*), and Japanese honeysuckle (*Lonicera japonica*).

Terrestrial Wildlife

In 2017, the USFWS IPaC database did not identify any federally-listed threatened or endangered species or habitat, bald or golden eagles, federally-designated critical habitat, or wildlife refuges within the study area. In 2019, the USFWS IPaC database review indicated that the federally threatened Northern Long-eared Bat (*Myotis septentrionalis*) could be found within the study area.

Effects Determination

The *Benning Road and Bridges Transportation Improvements EA* included assessment of direct (temporary and permanent), indirect, and cumulative impacts to environmental resources located within the study area. Overall, no significant impacts were identified. The following subsections provide a brief summary of anticipated project impacts related to natural resources and wildlife conservation.

Surface Water Resources

The modification of the Ethel B. Kennedy Bridge would require the removal of a portion of the existing bridge decking, modification of the girders beneath, and installation of the new deck and streetcar tracks. None of these actions would require modifying the piers, abutments, or similar elements of the Bridge's substructure. Based on the current design, these actions would be completed from the remaining sections of the bridge deck. As a result, no direct permanent impacts to Kingman Lake or the Anacostia River are anticipated at this time. Beyond this area, none of the improvements proposed under the Preferred Alternative would extend into WOUS, wetlands, navigable waterways, and/or 100- and 500-year floodplains. However, construction activities have the potential to increase the transmission of sediment, demolition debris, and construction materials (i.e., raw concrete, aggregates, etc.) through stormwater runoff. The occurrence and severity of these impacts will be minimized through strict adherence to DDOT's erosion and sediment control requirements, USACE and local permitting procedures.

The operation of the Preferred Alternative could indirectly affect surface water resources by increasing the amount of stormwater runoff being generated by Benning Road. This potential impact would be ameliorated by the renovation of existing stormwater facilities located within the limits of work. With these mitigation measures in place, the Preferred Alternative is not expected to contribute to the cumulative effect of past, present, and future development on surface water resources located within the project study area.

NMFS Listed Species and Critical Habitat

NOAA Fisheries identifies six stressors associated with the Atlantic sturgeon; they are:

- Sound
- Habitat Structure & Disturbance

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- Dredging
- Water Quality
- In-Water Structures (including Aquaculture)
- Prey Quantity/Quality.

Given the similarities between the two species, this list of stressors is also be used to assess the potential for impacts to the shortnose sturgeon.

Project-related sounds can have an effect when the construction or operation of the proposed action would increase ambient noise levels. The noise analysis conducted as part of the *Benning Road and Bridges Transportation Improvements EA* concluded that the predominant source of noise within the study area is the existing vehicular traffic. During construction, the modification of the Ethel B. Kennedy Bridge will lead to temporary increases in noise intensity. However, once the Preferred Alternative is in operation, the existing vehicular traffic will again be the dominant source of traffic within the study area. Based on this conclusion, the Preferred Alternative may affect, by is unlikely adversely affect either the Atlantic sturgeon or the shortnose sturgeon due to changes in sound intensity.

The modification and disturbance of habitat structure can have an effect when the proposed action lead to “*changes in substrate characteristics, depth, velocity, and no permanent or temporary impacts or changes in the availability of cover or ability of a fish to pass through the action area*” (NOAA, 2019). Since the proposed improvements to the Ethel B. Kennedy Bridge are expected to be completed from the bridge surface and no elements of the bridge substructure will be modified, none of these changes are expected to occur. Therefore, the Preferred Alternative is expected to have no effect on either the Atlantic sturgeon or the shortnose sturgeon due to changes in habitat structure or disturbance.

Dredging can have an effect by altering the characteristics of the waterbody’s substrate and exposing contamination. Since dredging is not required to complete the proposed improvements, the Preferred Alternative is expected to have no effect on either the Atlantic sturgeon or the shortnose sturgeon due to dredging.

Changes in water quality can have an effect when they impact habitat characteristics that are important to aquatic life, such as temperature, dissolved oxygen, salinity, and pH. Construction of the proposed improvements have the potential to temporarily impact water quality by increasing the release of sediments and building debris into surface water bodies. This impact will be mitigated through the installation of erosion and sediment control measures during constructions. Once the Preferred Alternative is in operation, portions of Benning Road will be wider than they are now. This expansion will increase the amount of impervious surface present within the Anacostia River watershed, and therefore increase the generation of stormwater runoff. Given the watershed’s high level of urbanization, the increase is expected to lead to very small relative change. To mitigate the effects of this runoff on surface water bodies, the Preferred Alternative includes the renovation of stormwater management facilities within the project limits. Based on these commitments, the Preferred Alternative may affect, by is unlikely adversely affect either the Atlantic sturgeon or the shortnose sturgeon due to changes in water quality.

In-water structure can have an effect when they alter habitat characteristics or become a source of contamination. If developed, the Preferred Alternative would not introduce any in-water structures. The Ethel B. Kennedy Bridge is itself an in-water structure. However, none of the proposed improvements involve modifying or replacing the elements of the bridge that rest in the water. Therefore, the Preferred Alternative is expected to have no effect on either the Atlantic sturgeon or the shortnose sturgeon due to the construction or modification of in-water structures.

Changes in the quality or quantity of prey can have an effect because they are trophic relationships are important for not only target species, but also larger food webs and nutrient cycling. The improvements proposed under the Preferred Alternative will in no way alter how the prey sought be the Atlantic or shortnose sturgeon move through or otherwise inhabit the study area. Therefore, the Preferred Alternative is expected to have no effect on either the Atlantic sturgeon or the shortnose sturgeon due to changes in prey quantity or quality.

Vegetation

No impact to the tracts of natural vegetation that occur along the banks of the Anacostia River and Fort Mahan Park would occur; however, improvements associated with the Preferred Alternative would result in the removal or relocation of approximately 147 street trees within the Benning Road ROW in order to accommodate roadway, pedestrian and bicycle, and transit improvements. The removal or relocation of street trees within the ROW would

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comprise a total caliper loss of 1,267 inches and associated loss of tree canopy. DDOT is the certified arborist and landscaper within its rights-of-way. DDOT's Urban Forestry Administration (UFA) will develop and implement a street tree management plan during the design phase of the proposed action. The plan will comply with District standards and regulations regarding planting, pruning, or removing a tree within the DDOT right-of-way as part of the Preferred Alternative. When trees must be removed and as reasonably feasible, DDOT will replace street trees removed within the right-of-way as part of UFA's Standard Specification 608.07 Tree Protection and Replacement, which requires a diameter breast-height (DBH) inch per DBH inch replacement. New street trees would reach a maturity in approximately 15 years.

Trees within DDOT ROW that do not require removal during construction of the Preferred Alternative potentially could be impacted by construction activities, resulting in such problems as root disturbance during grading, compaction of soils in the root area, loss of limbs, and bark damage from equipment hits. The occurrence of these impacts will be minimized through the installation of tree protection measures (*e.g.* temporary fencing, root pruning, limb pruning, etc.). With these mitigation measures in place, the Preferred Alternative is not expected to contribute to the cumulative effect of past, present, and future development on vegetated areas located within the project study area.

Terrestrial Wildlife

An on-line project review with the USFWS IPaC system indicated that the Northern Long-eared bat (*Myotis septentrionalis*) could be present within the study area. However, since most of the Study Area is urbanized and does not contain sufficient plant communities to serve as a wildlife habitat, the USFWS online determination indicates that the proposed action will have no effect on the threatened Northern long-eared bat. Due to the heavily urbanized nature of the study area, the Preferred Alternative is not expected to generate an indirect impact or contribute to a cumulative affect any terrestrial wildlife or rare, threatened, and endangered species.

Conclusion

Based on the above analysis that all effects of the proposed action will be insignificant and/or discountable, our preliminary determination is that the Benning Road and Bridges Transportation Improvement Project is not likely to adversely affect any listed species or critical habitat under NOAA Fisheries' jurisdiction. We certify that we have used the best scientific and commercial data available to complete this analysis. We request your concurrence with this determination. In addition, we are looking forward to hearing from your agency if there are any time-of-year restrictions that DDOT should follow during construction of this project. Thank you,

Sincerely,

Robyn Jackson

Robyn Jackson, P.E.
Project Manager

cc: Brian Hopper (NOAA)
Michael Hicks, (FHWA)
Austina Casey (DDOT)
Kirti Rajpurohit (DDOT)

Enclosures:

Attachment 1. *NOAA ESA Section 7 Mapper Output*

Attachment 2. *Benning Road and Bridges Transportation Improvement – Limit of Disturbance Figure Set*

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Rajpurohit, Kirti (DDOT)

From: Brian D Hopper - NOAA Federal <brian.d.hopper@noaa.gov>
Sent: Friday, July 17, 2020 9:53 AM
To: Rajpurohit, Kirti (DDOT)
Cc: Hicks, Michael (FHWA); Casey, Austina (DDOT); Jackson, Robyn (DDOT); Jonathan Watson - NOAA Affiliate
Subject: Re: PROJECT REVIEW- Benning Road & Bridges Transportation Improvements Project, Washington D.C.

CAUTION: This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to phishing@dc.gov for additional analysis by OCTO Security Operations Center (SOC).

Hi Kirti,

Your email and attached letter dated July 16, 2020, regarding DDOT's proposed Benning Road and Bridges Transportation Improvements project in northeast Washington, DC over the Anacostia River and Kingman Lake, requested concurrence with a determination that the proposed action may affect, but is not likely to adversely affect ESA-listed species under our jurisdiction.

Although shortnose sturgeon and Atlantic sturgeon originating from five Distinct Population Segments (DPS) are known to occur in the Chesapeake Bay and its rivers and tributaries, based on the activities associated with the project, the location of the project, and information you provided in your email and letter, we believe that these species will not be exposed to any direct or indirect effects of the action. Therefore, we do not believe a consultation in accordance with section 7 of the Endangered Species Act (ESA) is necessary. As such, no further coordination on this activity with the NMFS Protected Resources Division is necessary at this time. Should there be additional changes to the project plans or new information becomes available that changes the basis for this determination, further coordination should be pursued. Please contact me (brian.d.hopper@noaa.gov), should you have any questions regarding these comments.

Regards,
-Brian

On Thu, Jul 16, 2020 at 5:05 PM Rajpurohit, Kirti (DDOT) <Kirti.Rajpurohit@dc.gov> wrote:

Dear Ms. Anderson,

The District Department of Transportation (DDOT), in conjunction with the Federal Highway Administration (FHWA), is preparing an Environmental Assessment (EA) for the proposed Benning Road and Bridges Transportation Improvements project (the proposed action) in northeast Washington, DC. The EA is being prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations (40 CFR 1500-1508), FHWA's Environmental Impact and Related Procedures (23 CFR 771) and DDOT's Environmental Process Manual.

DDOT has completed the attached analysis using NOAA's Section 7: Consultation Technical Guidance in the Greater Atlantic Region (<https://www.fisheries.noaa.gov/new-england-mid-atlantic/consultations/section-7-consultation->

[technical-guidance-greater-atlantic](#)). Our preliminary determination is that the Benning Road and Bridges Transportation Improvement Project is not likely to adversely affect any listed species or critical habitat under NOAA Fisheries' jurisdiction, pursuant to Endangered Species Act of 1973. We request your concurrence with this determination. In addition, we are looking forward to hearing from your agency if there are any time-of-year restrictions that DDOT should follow during construction of this project.

Please feel free to contact us if you would need more information to aid in your review of this project. Thank you.

Kirti Rajpurohit

Environmental Policy Analyst

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For the latest information on the District Government's response to COVID-19 (Coronavirus), please visit coronavirus.dc.gov.

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In Reply To: HDA-DC

July 30, 2020

Ms. Jennifer Anderson
Protected Resources Divisions
NOAA Fisheries
55 Great Republic Drive
NOAA Fisheries Services
Gloucester, MA 01930

Subject: Belated Non-Federal Representative Designation

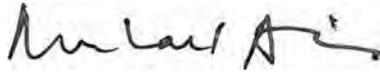
Dear Ms. Anderson:

In compliance with [50 CFR §402.08](#), the District Department of Columbia Division of the Federal Highway Administration (FHWA) belatedly designates the District of Columbia Department of Transportation (DDOT) to act as FHWA's non-Federal representative for the purpose of conducting informal consultation with the NOAA Fisheries, also known as the National Marine Fisheries Service, regarding Section 7 of the Endangered Species Act (ESA). This belated designation is subsequent to notification by DDOT that an informal consultation had occurred with NOAA Fisheries regarding the shortnose sturgeon and Atlantic sturgeon originating from five Distinct Population Segments (DPS) that are known to occur in the Chesapeake Bay and its rivers and tributaries; however, the critical step of obtaining designation as the non-Federal representative was inadvertently omitted. The intent of this letter is twofold; to backfill the procedural gap and officially grant non-Federal designation as referenced.

The assigned designation of non-Federal representation by FHWA to DDOT is specific to issues concerning the potential for the presence of the endangered Shortnose sturgeon (*Acipenser brevirostrum*) and the Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*) in the Anacostia River located in Washington, D.C. This informal consultation request for ESA Section 7 is crucial regarding compliance with the National Environmental Policy Act as it relates to the Benning Road & Bridges Transportation Improvements Project.

If there are any questions, please contact Mr. Michael Hicks at (202)-493-7023 (Michael.Hicks@dot.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Hicks". The signature is written in a cursive style with a prominent initial "M".

Michael Hicks
Environmental/Urban Engineer

cc: Brian Hopper (NOAA)
Robyn Jackson (DDOT)
Austina Casey (DDOT)
Kirti Rajpurohit (DDOT)

Rajpurohit, Kirti (DDOT)

From: Brian D Hopper - NOAA Federal <brian.d.hopper@noaa.gov>
Sent: Thursday, July 30, 2020 2:50 PM
To: Hicks, Michael (FHWA)
Cc: jennifer.anderson@noaa.gov; Jackson, Robyn (DDOT); Casey, Austina (DDOT); Rajpurohit, Kirti (DDOT); McDuffie, Cynthia (FHWA); Hoyle, Jim (FHWA)
Subject: Re: Belated Non-Federal Representative Designation - Benning Road & Bridges Transportation Improvements Project.

CAUTION: This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to phishing@dc.gov for additional analysis by OCTO Security Operations Center (SOC).

Hi Mike,

Thank you for forwarding the information regarding the designation of a non-federal representative for consultations under section 7 of the ESA regarding the Benning Road & Bridges Transportation Improvements Project. Just to clarify, the email we sent on July 17, 2020, responded to your request for consultation with a determination that species under our jurisdiction will not be exposed to any direct or indirect effects of the action. As a result, we do not believe a section 7 consultation is required. Therefore, at this time, no further coordination on this activity with the NMFS Protected Resources Division is necessary. Please let me know if you have any questions.

-Brian

On Thu, Jul 30, 2020 at 1:56 PM Hicks, Michael (FHWA) <Michael.Hicks@dot.gov> wrote:

Ms. Anderson, see the attached letter from the FHWA DC Division that is a belated notification of non-Federal representative designation to the District Department of Transportation (DDOT) for the referenced project for the reasons noted. Please don't hesitate to contact me if there are questions. Cynthia please file the attached letter as appropriate. Thanks...

-Mike-

--

Brian D. Hopper
Protected Resources Division
NOAA Fisheries
Greater Atlantic Regional Fisheries Office
200 Harry S Truman Parkway
Suite 460
Annapolis, MD 21401
410 267 5649
Brian.D.Hopper@noaa.gov

<http://www.greateratlantic.fisheries.noaa.gov/>



Government of the District of Columbia
Department of Transportation



July 22, 2020

Mr. Bryan King
District Department of Energy and Environment
Fisheries and Wildlife Division
12000 First Street NE
Washington, D.C 20002

RE: Benning Road & Bridges Transportation Improvements Project, Washington D.C.

Dear Mr. King,

The District Department of Transportation (DDOT), in conjunction with the Federal Highway Administration (FHWA), is preparing an Environmental Assessment (EA) for the proposed Benning Road and Bridges Transportation Improvements project (the proposed action) in northeast Washington, DC. The EA is being prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations (40 CFR 1500-1508), FHWA's Environmental Impact and Related Procedures (23 CFR 771), FHWA's Noise Regulations (23 CFR 772), and DDOT's Environmental Process Manual. The purpose of this letter is to solicit comments from the District Department of the Energy and the Environment (DOEE), pursuant to the Fish and Wildlife Coordination Act (16 U.S.C. 661-667e; the Act of March 10, 1934; Ch. 55; 48 Stat. 401), and the subsequent amendments, towards the proposed project.

Based on a project review conducted using the USFWS's Information for Planning and Consultation (IPaC) tool, the Northern long-eared bat (*Myotis septentrionalis*) potentially exists within the project study area. However, the IPaC review further determined that the proposed project will have no effect on the threatened Northern long-eared bat; and if the proposed action is not modified, no further consultation is required. In addition, the National Oceanic and Atmospheric Administration's (NOAA) Endangered Species (ESA) Section 7 Mapper indicated that the Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*) and Shortnose sturgeon (*Acipenser brevirostrum*) are known to inhabit the sections of Kingman Lake and the Anacostia River which lie within the project area. NOAA has concurred with DDOT's determination that both sturgeon species are unlikely to be adversely affected and further project consultation under Section 7 of the Endangered Species Act is not required. The USFWS IPaC project review and NOAA consultation are provided as Attachment 2 and 3 respectively. As the project design progresses, DDOT will apply for USACE and DOEE permits, in accordance with Sections 404 and 401 of the Clean Water Act. Erosion and sediment control and stormwater management plans would be developed in accordance with DCMR to minimize off-site impacts.

Purpose & Need

The purpose of the Benning Road and Bridges Transportation Improvements project is to address deficiencies in transportation infrastructure conditions, improve safety conditions and operations for both motorized and non-motorized access, and to provide for increased mobility and accessibility between the intersection of Benning Road, and Oklahoma Avenue and the Benning Road Metrorail Station.

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Project Study Area

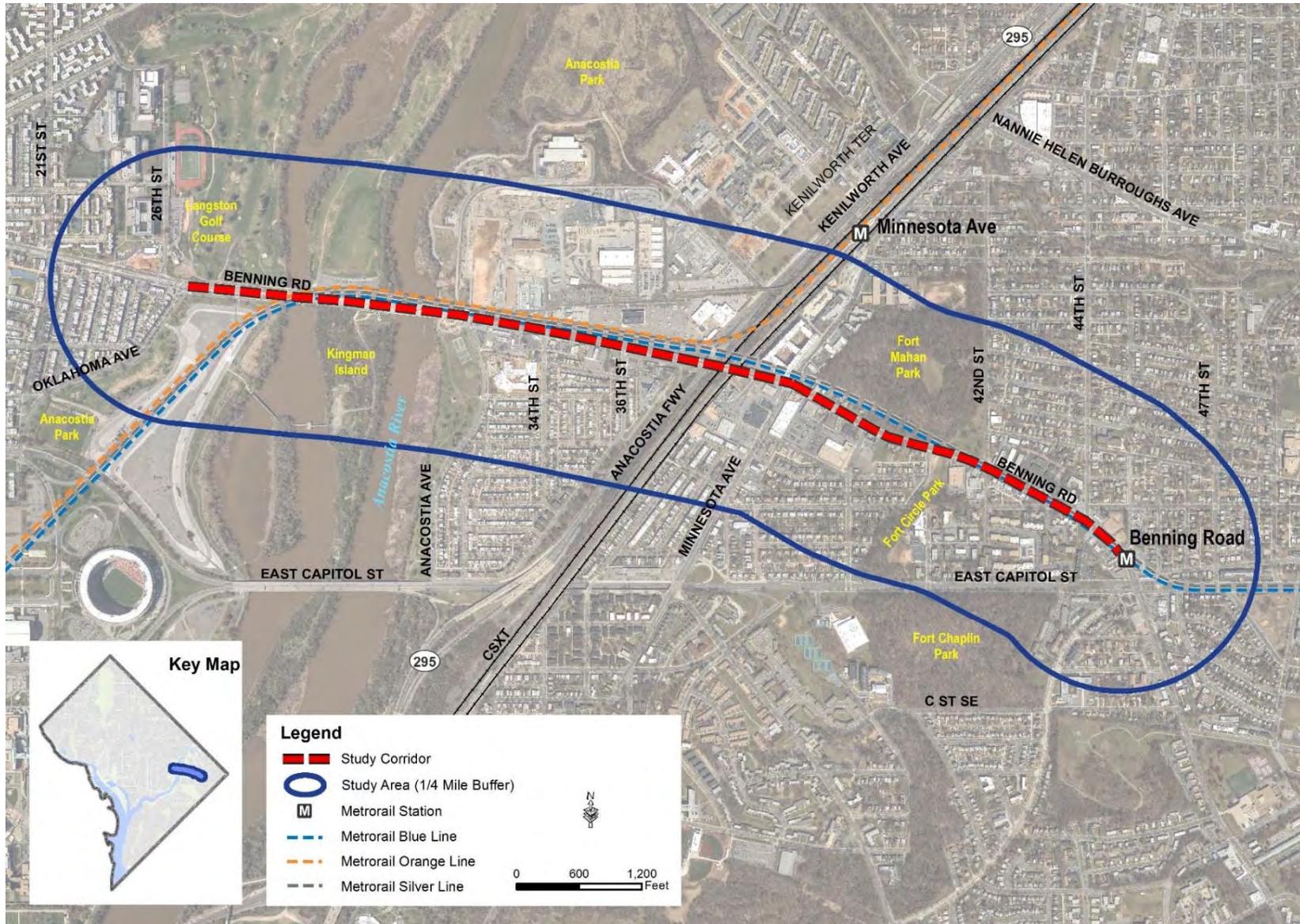
The Benning Road and Bridges Transportation Improvements Project is focused on the section of Benning Road between Oklahoma Avenue and the Benning Road Metro Station, in Washington, D.C. This segment is approximately two miles long (see Figure 1). The study area is the geographic area within one-quarter mile of Benning Road between and around the western and eastern termini. The Benning Road and Bridges Transportation Improvements Project study area encompasses approximately 730 acres (see Figure 2). Most of this area (69%) is comprised of urban land uses (*e.g.* residential, commercial, and industrial). The 31 % of the area (229 acres) that is classified as open spaces is comprised predominately of parks (25% or 184 acres), and open water (6% or 45 acres) (see Figure 3 and Figure 4).

Proposed Activities

Streetcar and Roadway Improvements

The Preferred Alternative would provide an 11- to 12-foot wide, median shared streetcar lane for the length of the Benning Road corridor and new pedestrian, bicycle, and safety improvements. Streetcar tracks would be provided in the inside lane adjacent to the median. The Preferred Alternative would include facilities and structures required for the streetcar operations such as traction power substations (TPSS), wired propulsion equipment (*i.e.* overhead wire and support poles) and streetcar stop platforms (see Figure 5). Figure 6 provides an illustration of how the typical section of Benning Road would be under the build condition. The Preferred Alternative's limit of disturbance is provided in Attachment 1.

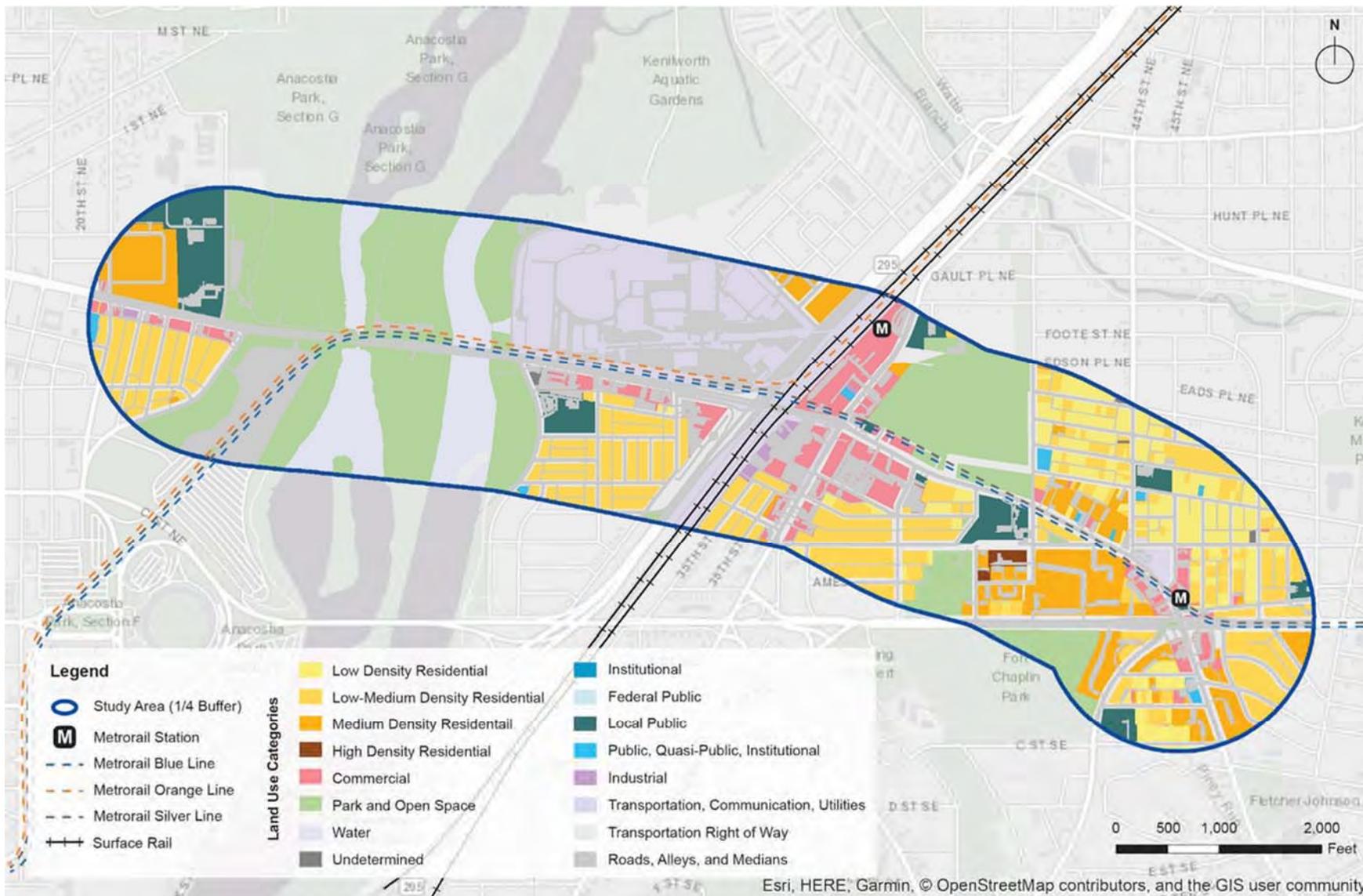
Figure 1. Project Study Area



Source: Benning Road and Bridges Transportation Improvements Final Environmental Assessment

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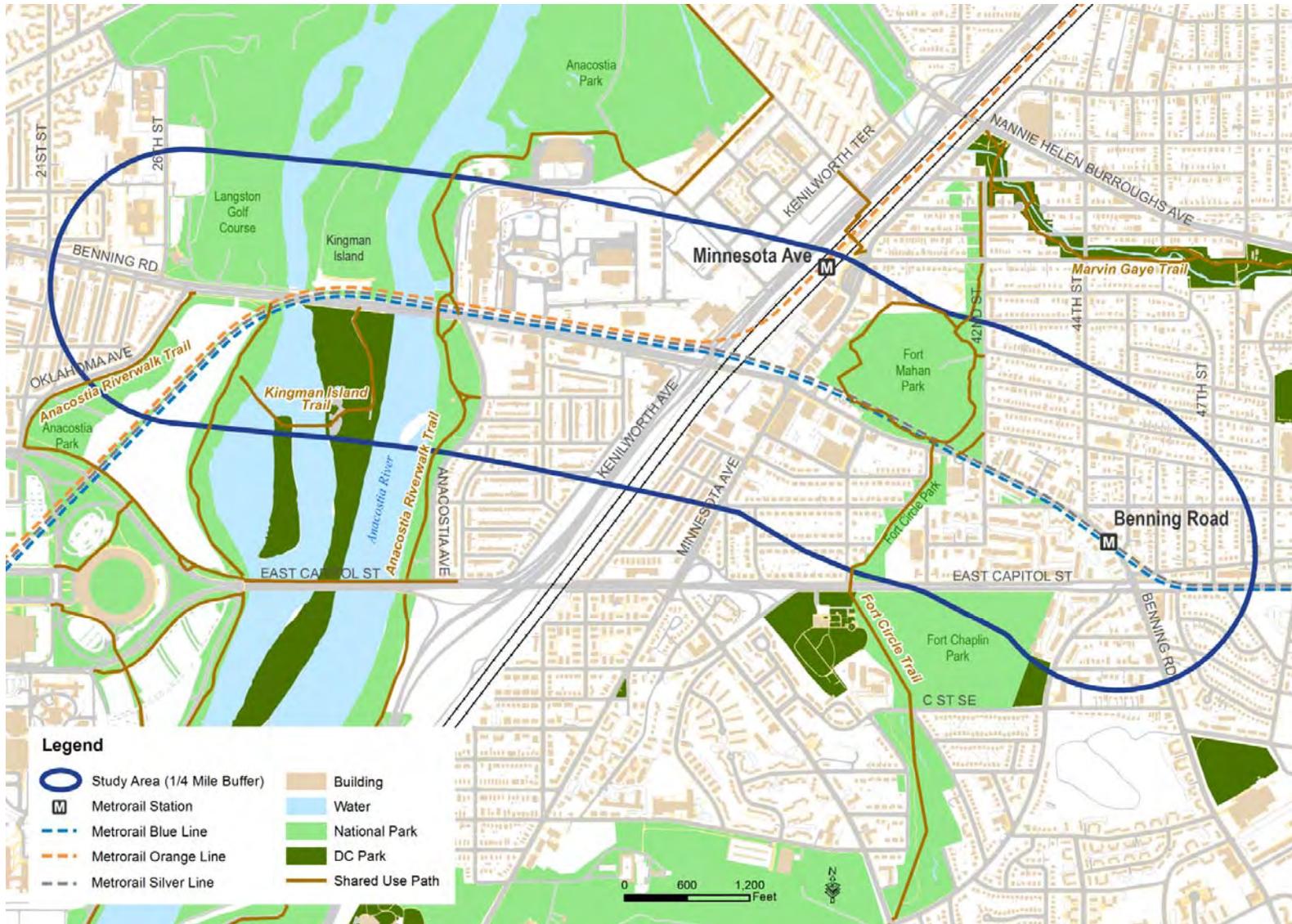
Figure 2. Land Use within the Project Study Area



Source: DC OCTO, Retrieved 2019

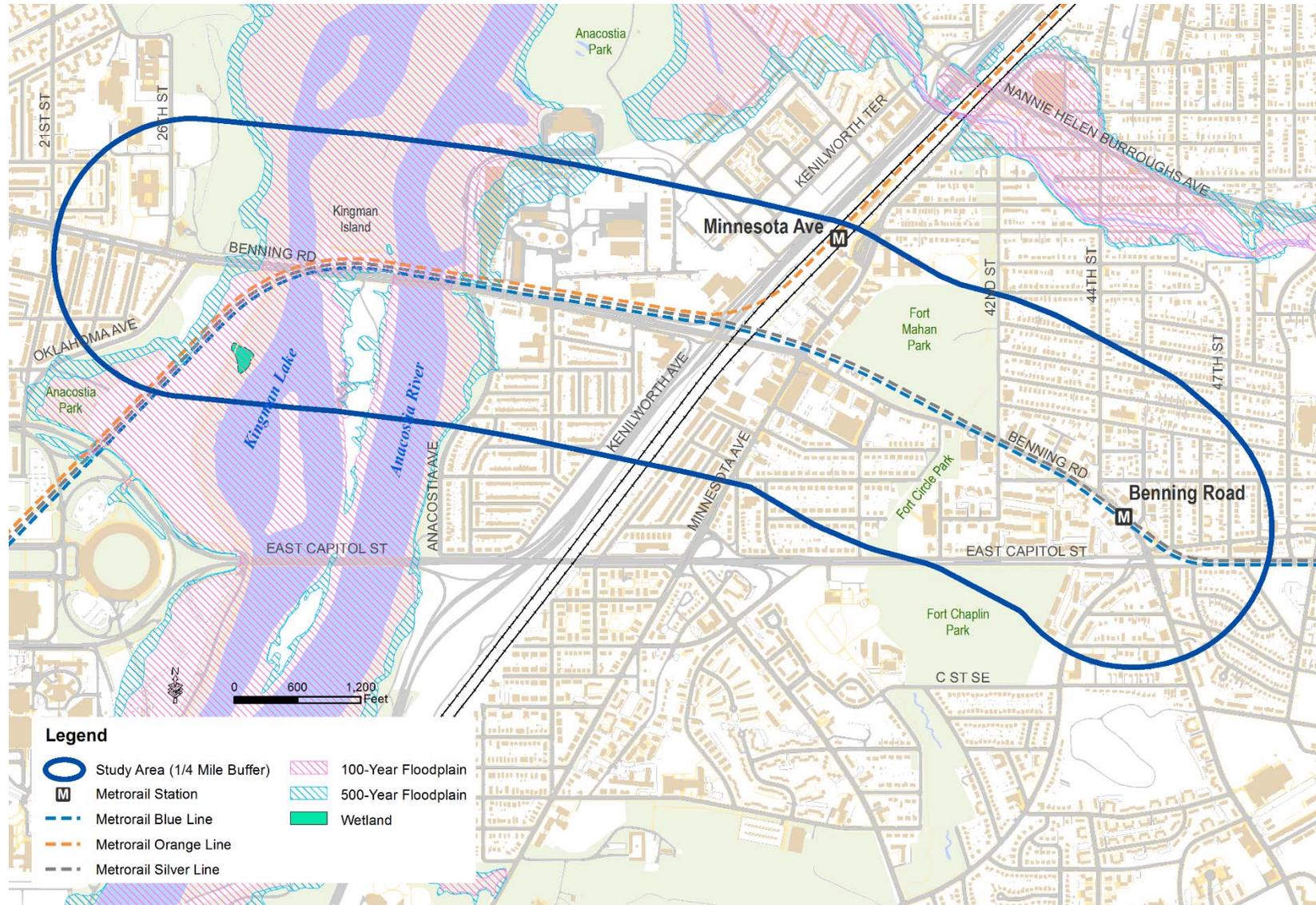
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Figure 3. Parks, Recreational Resources, and Trails in the Study Area



Source: DC Data Catalog (<http://data.dc.gov>) and NPS

Figure 4. Surface Water Resources in the Project Study Area



Source: DCGIS, UFWS, and FEMA retrieved February 2014

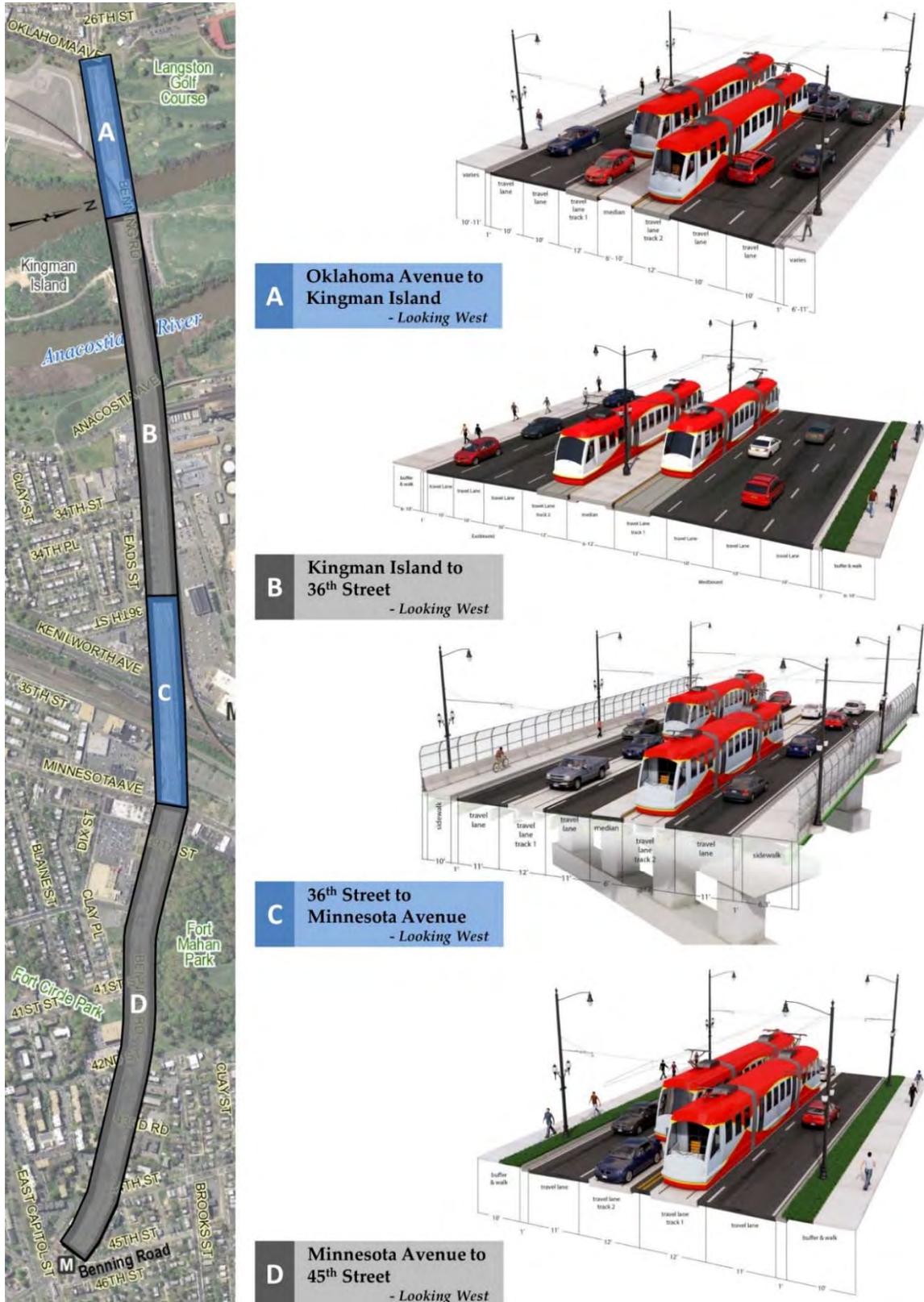
Figure 5. Proposed Streetcar Stops



Source: Benning Road and Bridges Transportation Improvements Final Environmental Assessment

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Figure 6. Preferred Alternative Typical Sections

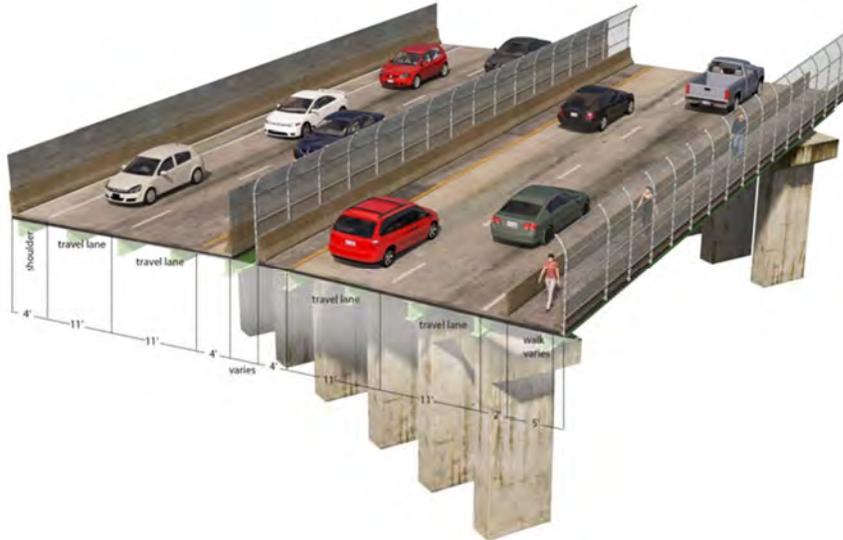


Source: Benning Road and Bridges Transportation Improvements Final Environmental Assessment

Bridge Improvements

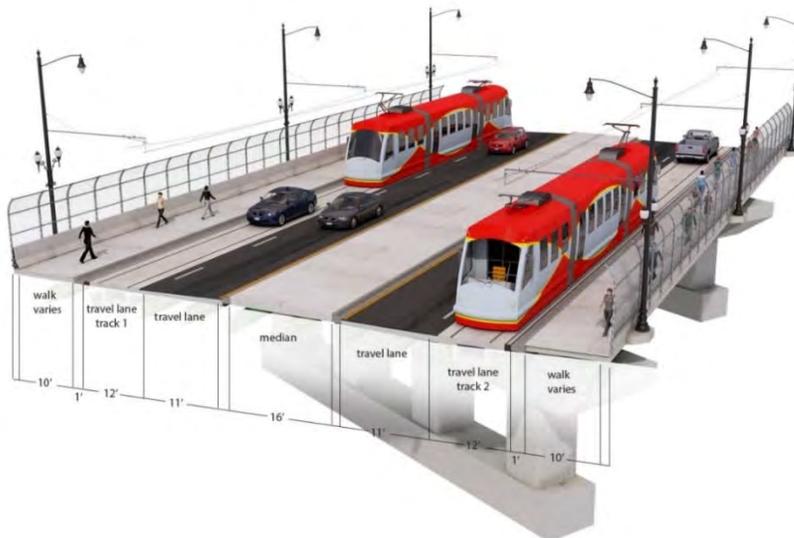
The Preferred Alternative recommends replacing the Lorraine H. Whitlock Bridge and modifying the bridges which carry Benning Road over Kingman Lake and the Anacostia River (the Ethel Kennedy Bridge). The Whitlock Bridge is comprised of two structures which convey Benning Road over DC 295 (Anacostia Freeway) and a CSX rail line. Figure 7 shows the Bridge's existing typical section. Inspection reports prepared for the Whitlock Bridge by DDOT in 2012 found the substructure of the bridges to be in fair to poor condition. The new structure(s) would replace the existing piers, abutments, superstructure, and deck. The new east abutment would be relocated approximately 45 feet east of its existing location. Figure 8 shows the Whitlock Bridge's typical section under DDOT's Preferred Alternative.

Figure 7. Existing Whitlock Bridge (looking east)



Source: Benning Road and Bridges Transportation Improvements Final Environmental Assessment

Figure 8. Proposed Whitlock Bridge Improvements (looking east)



Source: Benning Road and Bridges Transportation Improvements Final Environmental Assessment

The Ethel Kennedy Bridge over Kingman Lake and Anacostia River are both composed of single structures which currently bear six to eight travel lanes (three to four in each direction) and sidewalks. The proposed extension of the streetcar along Benning Road requires modifying the superstructure of both bridges (see Sections A and B in Figure 6). The scope of improvements includes: removing portions of the deck, reinforcing the girders, restoring the deck, and installing the streetcar tracks and overhead appurtenances. Based on this scope, all work on both bridges is expected to occur from the bridge surface.

Streetcar Propulsion Systems

DDOT's Preferred Alternative recommends the use of a wired population system to energize the proposed extension of the Benning Road Streetcar line. This system is comprised of two elements: an overhead wire contact system (known as a catenary) which delivers electricity to the streetcar vehicles, and two traction power substation (TPSS). A TPSS consists of a fenced area approximately 30 feet by 60 feet within which is a structure that houses electrical equipment. One location is on the east side of DC-295 and the CSX railroad tracks under the bridge structure on DDOT owned property; the second location is on WMATA's Benning Road Metrorail Station property.

DC Streetcar Car Barn

The Preferred Alternative includes the installation of a new two-track connection between the DC Streetcar Car Barn Training Center (located at 2550 Benning Road). The two new tracks would be provided along 26th Street and will connect the DC Streetcar Car Barn Training Center to the existing eastbound and westbound streetcar tracks on Benning Road.

Construction Outlook

The construction of Ethel Kennedy Bridges over Kingman Lake and Anacostia River is anticipated during 2021-2022. The overall project is estimated to complete during Fall of 2025.

Existing Environmental Resources

The *2015 District of Columbia Wildlife Action Plan* identifies four general types of habitat within the project area (DOEE, 2015). These habitat types are:

- Northeastern Upland Forest
- Northeastern Wetland Forest
- Grasslands & Emergent Wetlands and
- Open Water.

The following subsections provide brief descriptions of the plant and animal species which are found within the portions of these habitats which fall within the study area.

Aquatic Habitats

Based on the environmental information assembled for the *Benning Road and Bridges Transportation Improvements EA*, the project study includes a variety of aquatic habitats (see Figure 4). The study area contains three water bodies: the Anacostia River, Kingman Lake, and Piney Run. Piney Run is a stream that courses immediately south of Benning Road roughly paralleling the road's alignment. Piney Run connects to the Anacostia River and has been channelized in sections through the study area. All three water bodies are comprised of freshwater. The wetlands systems located within the study area surround the Anacostia River and Kingman Lake. They are both tidally influenced. Chapter 3 of the *2015 District of Columbia Wildlife Action Plan* includes map depicting the richness and abundance of Species of Greatest Conservation Need (SGCN). This mapping high level of species richness and abundance in the aquatic habitats just south of the Ethel Kennedy Bridge.

The *2015 District of Columbia Wildlife Action Plan* identifies 5 classifications of aquatic habitat near the Benning Road Corridor (DOEE, 2015). The most widespread of these classifications are Embayed River Area and Small River – Anacostia. The Embayed River Area includes Kingman Lake while the Small River – Anacostia classification covers the river's main channel. Both areas are abutted by Intertidal Mudflats and Wetland & Grassland. Most the areas

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classified as Intertidal Mudflats are associated with Kingman Lake, whereas the Anacostia River's riparian buffer contains most the areas classified as Wetland & Grassland. The least widespread aquatic habitat type is Creek & Headwater Creek. This classification only occurs around the section of Kingman Lake between Langston Golf Course and Kingman Island.

Terrestrial Habitats

The 2015 *District of Columbia Wildlife Action Plan* identifies 3 types of terrestrial habitats near the Benning Road Corridor (DOEE, 2015). Of these, Urban and Recreational Grasses is the most prolific. This habitat type occupies most of Anacostia Park, Langston Golf Course, and the northern portion of Kingman Island. The southern portion of Kingman Island is classified as Ruderal Upland – Old Field. This classification represents land that were disturbed in the past and were colonized by early successional and opportunistic species. The portion of the Anacostia River's east bank that abuts the PEPCO Benning Service Center (3400 Benning Road NE), is also assigned this classification. The wooded portions of Fort Mahan Park are classified as Central Appalachian Dry Oak-Pine Forest. Of these three, the Central Appalachian Dry Oak-Pine Forest community most likely has the highest conservation value. Based on the Core Habitat Ranking presented in Chapter 3 of the 2015 *District of Columbia Wildlife Action Plan*, much of Fort Mahan Park is considered some of the highest value (Rank 10) terrestrial habitats in the District. This ranking is supported by the SGCN richness and abundance mapping included in Chapter 3 of the 2015 *District of Columbia Wildlife Action Plan*, which assigns Fort Mahan high scores for both measures.

NPS completed an Environmental Assessment for the implementation of Section 3 of the Anacostia Riverwalk Trail in August 2011. Due to the proximity of the Anacostia Riverwalk Trail study area, the biological assessments and observations in that EA serve as the primary research source for the identification of wildlife in the study area. This resource was supplemented by visual observation during field investigations for the proposed action. NPS identified the presence of a riparian floodplain, emergent, and forested wetland in the general study area which serves as wildlife habitat. Along the Anacostia River, the NPS analysis found mid-successional Sycamore/Green Ash/Box Elder/Silver Maple forest association is the dominant plant community, consisting of common species: American sycamore (*Platanus occidentalis*), silver maple (*Acer saccharinum*), box elder (*Acer negundo*), green ash (*Fraxinus pennsylvanica*), black cherry (*Prunus serotina*), and red maple (*Acer rubrum*), with occurrences of elm (*Ulmus sp.*), hickory (*Carya sp.*), oaks (*Quercus spp.*), tree of heaven (*Ailanthus altissima*), tulip poplar, (*Liriodendron tulipifera*), persimmon (*Diospyros virginiana*) and Eastern cottonwood (*Populus deltoides*) and white mulberry (*Morus alba*). Areas of upland forest are dominated by plant species including red mulberry (*Morus rubra*), black locust (*Robinia pseudoacacia*), willow oak (*Quercus phellos*), princess tree (*Paulownia tomentosa*), northern catalpa (*Catalpa speciosa*), silk tree (*Albizia julibrissin*), and slippery elm (*Ulmus rubra*). Invasive vegetative species identified by NPS (and in the NPS invasive plant species publication) include poison ivy (*Toxicodendron radicans*), bush honeysuckle (*Lonicera sp.*), tree of heaven (*Ailanthus altissima*), white mulberry (*Morus alba*), Japanese Knotweed (*Fallopia japonica*), princess tree (*Paulownia tomentosa*), silk tree (*Albizia julibrissin*), and Japanese honeysuckle (*Lonicera japonica*).

The UFA database has inventoried 2,480 street trees within the study area, including approximately 199 street trees within the Benning Road project limits-of-disturbance (LOD). Street trees along Benning Road include the American elm (*Ulmus americana*), Cherry tree (*Prunus sp.*), Katsura tree (*Cercidiphyllum japonicum*), Littleleaf linden (*Tilia cordata*), Pin Oak (*Quercus palustris*), Princeton elm (*Ulmus americana 'Princeton'*), Red maple (*Acer rubrum*), Sawtooth oak (*Quercus acutissima*), Sweetgum (*Liquidambar styraciflua*), and Thornless honeylocust (*Gleditsia triacanthos var. inermis*).

Wildlife Including Threatened and Endangered Species

Federally Endangered Species:

The USFWS Chesapeake Bay Preservation Office IPAC tool was used in August 2017 and again in October 2019 to determine if any listed, proposed or candidate species may be present within the study area. In 2017, the USFWS IPaC database did not identify any federally-listed threatened or endangered species or habitat, bald or golden eagles, federally-designated critical habitat, or wildlife refuges within the study area. In 2019, however, the USFWS IPaC database review indicated that the federally threatened Northern long-eared bat (*Myotis septentrionalis*) could be found within the study area.

The Section 7 ESA Mapper was used to generate a list of federally endangered aquatic species that may be inhabiting the section of the portions of the Anacostia River and Kingman Lake that fall within the project study area. The Mapper

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identified two species: Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*) and shortnose sturgeon (*Acipenser brevirostrum*). The life phases and times of year associated with each species is provided in Table 1. According to the Atlantic Sturgeon Critical Habitat Federal Register Final Rule (82 FR 39160), the sections of Kingman Lake and the Anacostia River which fall within the project study area are not classified as critical habitat.¹

Table 1. Federal Endangered Aquatic Species

Species	Life phase	Activity	Time(s) of Year
Atlantic sturgeon (<i>Acipenser oxyrinchus oxyrinchus</i>)	Eggs and Yolk-sac Larvae	N/A	03/15 to 06/15; 08/01 to 12/31
	Post Yolk-sac Larvae	Migrating & Foraging	03/15 to 07/15; 08/01 to 01/31
	Young of Year		01/01 to 12/31
	Juvenile		01/01 to 12/31
	Sub-Adult		03/15 to 11/30
	Adult	Spawning; Migrating & Foraging	03/15 to 05/15; 08/01 to 11/30
Shortnose sturgeon (<i>Acipenser brevirostrum</i>)	Post Yolk-sac Larvae	Migrating & Foraging	03/15 to 06/30
	Young of Year		01/01 to 12/31
	Juvenile		01/01 to 12/31
	Adult		01/01 to 12/31

Source: (NOAA, 2020)

Other Sensitive Species:

During its biological surveys, NPS documented 191 bird, 50 butterfly, 23 fish, 20 reptile, 18 amphibian, and 17 mammal species as either residents in or migrants passing through Anacostia Park. Local predators include red and gray foxes (*Vulpes vulpes* and *Urocyon cinereoargenteus*), raccoons (*Procyon lotor*), ospreys (*Pandion haliaetus*), red-tailed hawks (*Buteo jamaicensis*), and transitory bald eagles (*Haliaeetus leucocephalus*). Other species identified by NPS were opossums (*Didelphis marsupialis*), gray squirrels (*Sciurus carolinensis*), and various species of bats, butterflies, dragonflies, snakes, turtles, migratory songbirds, and waterfowl. In prior studies, NPS identified additional species in the area:

- Various species of amphibians, including marbled salamander (*Ambystoma opacum*), red-spotted newt (*Notophthalmus viridescens*), and spring peeper (*Pseudacris crucifer*), in both emergent and forested wetlands;
- Eastern box turtle (*Terrapene carolina*) in forested uplands;
- Eastern tiger swallowtail butterfly (*Papilio glaucus*) in upland fields;
- Red-winged blackbird (*Agelaius phoeniceus*) in emergent wetlands and floodplain fields;
- Egret species in open water of the Anacostia River;
- Northern mockingbird (*Mimus polyglottos*) and American crow (*Corvus brachyrhynchos*);
- Black-crowned night heron (*Nycticorax nycticorax*) in the Anacostia River riparian buffer; and
- Great blue heron (*Ardea herodias Linnaeus*) and double-crested cormorant (*Phalacrocorax auritus*).

According to the 2015 District of Columbia Wildlife Action Plan, the Hay's Spring Amphipod (*Stygobromus hayi*) and Kenk's Amphipod (*Stygobromus kenki*) have been found only in the Rock Creek Valley, and therefore are not believed to be present within the Anacostia River system located within the project study area.

¹ Atlantic Sturgeon Critical Habitat Map and GIS Data (2019, October 18). NOAA Fisheries. Retrieved July 6, 2020, from <https://www.fisheries.noaa.gov/resource/map/atlantic-sturgeon-critical-habitat-map-and-gis-data>

Preliminary Impact Analysis

Aquatic Habitats

The modification of the Ethel Kennedy Bridge would require the removal of a portion of the existing bridge decking, modification of the girders beneath, and installation of the new deck and streetcar tracks. None of these actions would require modifying the piers, abutments, or similar elements of the Bridge's substructure. Based on the current design, these actions would be completed from the remaining sections of the bridge deck. As a result, no direct permanent impacts to Kingman Lake or the Anacostia River are anticipated at this time. Beyond this area, none of the improvements proposed under the Preferred Alternative would extend into the Waters of the US (WOUS) including the wetlands, navigable waterways, and/or 100- and 500-year floodplains.

Construction activities have the potential to increase the transmission of sediment, demolition debris, and construction materials (i.e., raw concrete, aggregates, etc.) through stormwater runoff. The occurrence and severity of these potential impacts will be minimized through strict adherence to DDOT's erosion and sediment control requirements, USACE and DOEE permitting procedures.

Terrestrial Habitats

No impact to the tracts of natural vegetation that occur along the banks of the Anacostia River and Fort Mahan Park are expected to occur due to the operation of the Preferred Alternative. However, approximately 147 street trees are predicted to be removed within the Benning Road ROW in order to accommodate roadway, pedestrian and bicycle, and transit improvements. The removal or relocation of street trees within the ROW would comprise a total caliper loss of 1,267 inches. Nine of these trees have a circumference greater than 100 inches and are considered Heritage Trees in accordance with the DDOT Tree Regulations. Additional trees not maintained by DDOT but located in the public ROW would also be lost, however based on a review of aerial photography and Google Street View mapping, this loss would be negligible. Trees within DDOT ROW that do not require removal during construction of the Preferred Alternative potentially could be impacted by construction activities, resulting in issues like root disturbance, soil compaction, loss of limbs, and bark damage. The occurrence of these impacts will be minimized through the installation of tree protection measures (e.g. temporary fencing, root pruning, limb pruning).

Wildlife Including Threatened and Endangered Species

Northern Long-eared Bat

An on-line project review with the USFWS IPaC system indicated that the Northern Long-eared bat could be present within the study area. However, since most of the study area is urbanized and does not contain suitable habitat, the USFWS IPaC online determination indicates that the proposed action would have no effect on the threatened Northern long-eared bat (see Attachment 2).

Atlantic and Shortnose Sturgeon

NOAA Fisheries identifies six stressors associated with the Atlantic sturgeons. They are:

- Sound
- Habitat Structure & Disturbance
- Dredging
- Water Quality
- In-Water Structures (including Aquaculture)
- Prey Quantity/Quality.

Given the similarities between the two species, this list of stressors is also be used to assess the potential for impacts to the shortnose sturgeon. Of these six, only water quality is expected to be affected by the construction and operation of the proposed improvements.

Construction of the proposed improvements have the potential to temporarily impact water quality by increasing the release of sediments and construction debris into surface water bodies. This impact will be mitigated through the installation of erosion and sediment control measures in accordance with the conditions of the USACE and DOEE permits. Once the Preferred Alternative is in operation, portions of Benning Road will be wider than they are now. This expansion will increase the amount of impervious surface present within the Anacostia River watershed, and therefore increase the generation of stormwater runoff. Given the watershed's high level of urbanization, this increase is expected to lead to very small relative change. To mitigate the effects of this runoff on surface water bodies, the Preferred Alternative includes the renovation of stormwater management facilities within the project limits.

DDOT initiated consultation with NOAA Fisheries for Benning Road and Bridges Transportation Improvement Project. On July 17, 2020 NOAA provided its concurrence with the determination that the project, as proposed, is not likely to adversely affect any listed species or critical habitat under NOAA Fisheries' jurisdiction (Attachment 3)

Other Sensitive Species

The limit of disturbance needed to construct the Preferred Alternative is limited to the area immediately abutting DDOT's existing right of way. Based on the environmental resources data collected for the *Benning Road and Bridges Transportation Improvement Final EA* and the resource mapping presented in the *2015 District of Columbia Wildlife Action Plan*, most of these areas contain urban landscapes with a low conservation value. The portions of the corridor that have high conservation values, like Kingman Island and Fort Mahan, are not anticipated to experience any habitat disturbance. In both cases, turf grass and street trees are expected to be disturbed near these sites due to sidewalk widening and the relocation of utility poles. Impacts associated with this disturbance will be offset through the installation of erosion and sediment control measures and compensatory tree plantings. As noted previously, impacts to water quality that could be generated during the modification of the Ethel Kennedy Bridge will be mitigated through the use of shielding (to intercept debris), temporary erosion and sediment control measures (to capture runoff); and through the conditions of the USACE and DOEE Section 404 and 401 permits. Due to the heavily urbanized nature of the study area, the Preferred Alternative is not expected to generate an indirect impact or contribute to a cumulative affect sensitive terrestrial or aquatic wildlife.

Conclusion

Based on the above analysis, DDOT anticipates that the Benning Road and Bridges Transportation Improvement Project, as proposed, is not likely to adversely affect any fish and wildlife species; and their habitats; pursuant to the FWCA of 1934, as amended. We request your concurrence with this determination. In addition, since the proposed project involves work on Ethel Kennedy and Whitlock Bridges, DDOT is requesting your agency's comments towards any findings of state -listed bats, federally- listed bats; and migratory birds nesting or hibernating on these bridges. Thank you for considering the project materials. We look forward to receiving comments from the DOEE's Fish and Wildlife Division.

Sincerely,

Robyn Jackson

Robyn Jackson, P.E.
Project Manager

cc: Michael Hicks, (FHWA)
Austina Casey (DDOT)
Kirti Rajpurohit (DDOT)

Enclosures: *Attachment 1: Benning Road and Bridge Transportation Improvement Limit of Disturbance Figure Set*
Attachment 2: USFWS IPaC Review
Attachment 3: NOAA Consultation

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

Kirti Rajpurohit
Environmental Policy Analyst
55 M Street, SE
Suite 400
Washington, DC 20003

August 5, 2020

Re: **Threatened and Endangered Species Consultation**

Dear Ms. Rajpurohit:

The Department of Energy and Environment (the Department) has reviewed the Department of Transportation's (DDOT) request for information regarding the presence of threatened and endangered species with regards to its proposed Benning Road & Bridges Transportation Improvements Project. Please be advised that this response is not an assessment of environmental, human, or economic impacts. Additionally, please note that this document does not satisfy any federal requirements for a Section 7(c) consultation of the Endangered Species Act (the Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). The response to this request is written below.

Interagency Cooperation

Sec. 7.

(c) BIOLOGICAL ASSESSMENT.—(1) To facilitate compliance with the requirements of subsection (a)(2), each Federal agency shall, with respect to any agency action of such agency for which no contract for construction has been entered into and for which no construction has begun on the date of enactment of the Endangered Species Act Amendments of 1978, request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action. If the Secretary advises, based on the best scientific and commercial data available, that such species may be present, such agency shall conduct a biological assessment for the purpose of identifying any endangered species or threatened species which is likely to be affected by such action. Such assessment shall be completed within 180 days after the date on which initiated (or within such other period as is mutually agreed to by the Secretary and such agency, except that if a permit or license applicant is involved, the 180-day period may not be extended unless such agency provides the applicant, before the close of such period, with a written statement setting forth the estimated length of the proposed extension and the reasons therefor) and, before any contract for construction is entered into and before construction is begun with respect to such action. Such assessment may be undertaken as part of a Federal agency's compliance with the requirements of section 102 of the National Environmental Policy Act of 1969 (42 U.S.C. 4332). (2) Any person who may wish to apply for an exemption under subsection (g) of this section for that action may conduct a biological assessment to identify any endangered species or threatened species which is likely to be affected by such action. Any such biological assessment must, however, be conducted in cooperation with the Secretary and under the supervision of the appropriate Federal agency.

In accordance with the Act please note that the following species are known to occur in or may occur in the District of Columbia.

Scientific Name	Common Name	Status
<u><i>Acipenser brevirostrum</i></u>	Shortnose sturgeon	Endangered/Present
<u><i>Acipenser oxyrinchus oxyrinchus</i></u>	Atlantic sturgeon	Endangered
<u><i>Alasmidonta heterodon</i></u>	Dwarf wedgemussel	Endangered
<u><i>Clemmys muhlenbergii</i></u>	Northern bog turtle	Threatened
<u><i>Myotis septentrionalis</i></u>	Northern long-eared bat	Threatened/Present
<u><i>Stygobromus hayi</i></u>	Hay's Spring amphipod	Endangered/Present
<u><i>Stygobromus kenki</i></u>	Kenk's amphipod	Candidate

Evaluation

According to current observations, surveys, and data derived from the District's *Wildlife Action Plan*, the proposed project area does not harbor any listed species. As a result, the following actions are suggested.

- The Department and **DDOT** shall monitor the proposed and surrounding project areas regularly for the duration of the project.
- If either the Department or **DDOT** identify any changes regarding the presence of federally threatened or endangered species it shall notify the other immediately to determine further actions.
- This response does not characterize nor quantify the presence of more common species that may be federally protected (e.g. migratory birds).
- Unless otherwise permitted by law, all District of Columbia and federal laws pertaining to fish and wildlife shall remain in effect for the duration of the project.

Finally, this correspondence in no way circumvents or nullifies any other permits or processes that may be required in connection with this project. For more information please contact me by phone at (202) 997-9607 or via email at bryan.king@dc.gov.

Sincerely,



Bryan D. King
Associate Director

BENNING ROAD & BRIDGES TRANSPORTATION IMPROVEMENTS

HAZARDOUS MATERIALS

FINAL AUGUST 2020



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Figure F-1: Map of EDR-Listed Recognized Environmental Conditions Sites

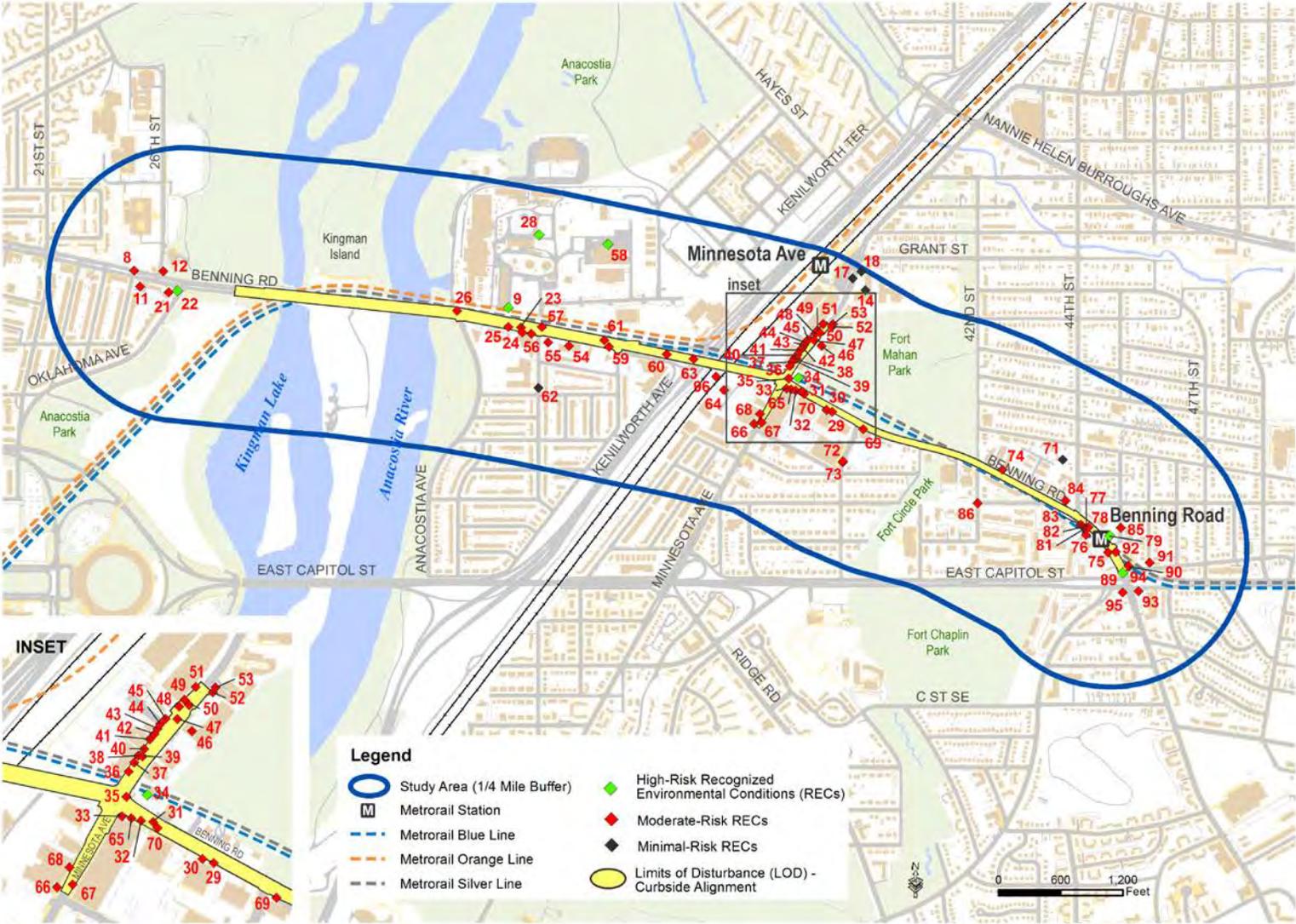


Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
8	Spingarn SHS	2500 Benning Road, NE	RCRA - CESQC, DC UST	Generates and/or accumulates the following: ignitable hazardous waste; corrosive hazardous waste; reactive hazardous waste; explosive hazardous waste; and mercury. EDR did not identify any violations; however, there is no record of off-site disposal. Two 10,000 gallon heating oil USTs were identified on the property as permanently out of use. No regulatory status or closure documentation was provided.	The presence of hazardous materials and lack of disposal documentation may have resulted in improper disposal and impacted the property. Furthermore, a lack of regulatory information regarding the presence of previous USTs may have impacted the property.
9	Potomac Electric Power Company	3400 Benning Road, NE	RCRA LQG/NLR, NY Manifest, NJ Manifest, US AIRS	EDR reported this property generates and/or accumulates PCB waste (≥ 500 ppm) and lead; however, records indicate the material is transported to a TSDF under proper manifest. Property was identified as having actual or potential emissions above applicable major source thresholds. With the exception of one event, EDR did not report compliance violations. The aforementioned violation was for emissions and procedural compliance. No additional information was provided by EDR.	The generation and temporary staging of PCB waste ≥ 500 ppm has the potential to impact the property.
11	Unknown	2501 Benning Road, NE	DC Historic UST	EDR reported one 2,000 gallon heating oil UST located on the property. No additional information is provided by EDR.	The presence of a former UST on the property with no closure information may have impacted the property.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
12	Langston Golf Course	2600 Benning Road, NE	DC LUST, DC UST, DC RGA LUST, ERNS	EDR reported a leaking gasoline USTs on the property in 1991 and 1997 that impacted the soil. The regulatory status of these LUST cases is closed. One 500 gallon gasoline UST was identified on the property by EDR. No additional information was provided. In 1993, a regulator reservoir for a pole mounted transformer fell to ground and leaked when the pole was struck by an auto. EDR reported 69 gallons of transformer oil leaked and may have reached the Anacostia River; however, no indication of reaching the river was observed by Pepco employees. Pepco cleaned up the spill.	Previous soil impact from two LUST cases was reported. The regulatory status is closed; however, impacted soil may be encountered during construction activities. Additionally, impacted soil may be encountered resulting from the transformer oil spill in 1993.
14	Carter Woodson	4095 Minnesota Avenue, NE	DC UST	EDR reported one 15,000 gallon heating oil UST on the property as permanently out of use. No additional information was provided. It should be noted that this database listing is suspected to be the Friendship Collegiate Academy (Edison Friendship-Woodson Campus).	The presence of a former UST on the property with no closure information may have impacted the property.
17	Woodson Junior High School	4101 Minnesota Avenue, NE	RCRA NonGen/NLR	Generates and/or accumulates the following: ignitable hazardous waste; corrosive hazardous waste; and reactive hazardous waste. EDR did not identify any violations; however, there is no record of off-site disposal.	The presence of hazardous materials and lack of disposal documentation may have resulted in improper disposal and impacted the property.
18	Cowboys Cleaners	Not listed	FINDS	EDR identified the property in the FINDS database	The identification of a dry cleaners in the area of EDR ID 10 may have impacted the property.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
21	Stadium Exxon (also listed as Prices Esso Station)	2651 Benning Road, NE	ICIS, FINDS, US Historic Auto Station, DC UST, DC LUST, RCRA-CESQG, NJ Manifest	EDR reported a violation of the clean air act. No additional information was provided by EDR. The property reportedly has been a gas/service station since 1940 with the following USTs currently or previously in use: 6,000 gallon gasoline; 10,000 gallon gasoline; 6,000 gallon gasoline; and 1,000 gallon waste oil. Impacted soil was identified during a waste oil UST closure in 1996 with a regulatory status of closed. There is an open case for soil and groundwater impact that was reported in 2009. Ignitable and corrosive hazardous waste is generated and/or accumulated at the site; however, these wastes are disposed of at a TSDF under proper manifest with no violations other than administrative.	The presence of an active and former LUST case indicates there may be impact to the property.
22	No Name	Corner of Benning Avenue and Oklahoma Avenue	ERNS	Release reported in 1994 indicates antifreeze (ethylene glycol) has continually been dumped on this property and in the street for over a year. It should be noted that the report indicates the property is an Exxon station and it is suspected that is the station identified above. No additional information provided.	No volume or remedial activities were provided by EDR; therefore, there is a potential this may have impacted the property and/or street.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
23	Sims Service Station (also listed as Benning Road Shell, DAG Petroleum Management, Inc. and Lees Automotive)	3355 Benning Road, NE	US Historic Auto Station, ICIS, FINDS, DC UST, US AIRS, RCRA NonGen/NLR,	EDR reported the property has been a gas/service station since 1960 through the present time with the following USTs previously or currently in use: one-500 gallon gasoline; two-12,000 gallon gasoline; four-2,000 gallon gasoline; and one 8,000 gallon diesel. EDR reported a clean air act violation; however, no additional information was provided. Generates and/or accumulates the following: ignitable hazardous waste; cadmium; lead; benzene; 1,4-dichlorobenzene; tetrachloroethylene; and trichloroethylene. Two administrative violations were reported by EDR. The property was not identified in a disposal manifest database.	The presence of a gas/service station since 1960 and no reported disposal procedures for hazardous waste may have impacted the property.
24	Sulli's Sunoco (also listed as Sunoco Service Station, Auto Care, Inc.)	3341 Benning Road, NE	US Historic Auto Station, DC UST, DC Historic UST, RCRA NonGen/NLR, FINDS, US AIRS	EDR reported the property has been a gas/service station since 1954 through the present time. According to EDR, three gasoline and one waste oil UST are permanently out of use on the property. No additional information was provided. Generates and/or accumulates ignitable hazardous waste with no violations reported. The property was not identified in a disposal manifest database. It is suspected that this listing is part of the above listing for Sims Service Station.	The presence of a gas/service station since 1954 and no reported disposal procedures for hazardous waste may have impacted the property.
25	George B Holmes	3339 Benning Road, NE	US Historic Auto Station	EDR reported the property has been a gas/service station since 1940 through the present time assuming this property is the same as Sulli's Sunoco and Sims Service station, which is likely based on site reconnaissance and historical information.	The presence of a gas/service station since 1940 may have impacted the property.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
26	National Park Service (also listed as Kenilworth Maintenance Yard, DC Transfer Station)	3200 Benning Road, NE	ICIS, DC LUST, RCRA NonGen/NLR, ERNS, DC UST, FINDS	<p>EDR identified the property in the ICIS database for a UST violation. No additional information was provided by EDR. Soil impact from a gasoline and diesel USTs were reported in 1990; however, the case is closed. In addition, soil impact was reported in 1999 from a gasoline UST; however, the case is closed. Generates and/or accumulates the following: ignitable hazardous waste; corrosive hazardous waste; and methylbenzene. Administrative violations were reported by EDR. The property was not identified in a disposal manifest database. According to the ERNS database, 40 gallons of transformer oil that contains PCBs was released from an out of service transformer that was damaged. The spill reporter indicated the damaged transformer may have as much as 250 gallons of mineral oil and was still slowly leaking.</p> <p>EPA Region III was contacted and some containment was conducted with sorbents. The ERNS database indicates spill may get into storm drains and discharge to the Anacostia River if it rains. The following USTs were identified by EDR as permanently out of use: two-4,000 gallon gasoline; two-6,000 gallon gasoline; one-2,000 gallon gasoline; one-10,000 gallon gasoline; two-4,000 gallon diesel; two-6,000 gallon diesel; one-1,000 gallon diesel; one-10,000 gallon heating oil; and one-5,000 gallon heating oil. No additional information regarding the aforementioned USTs was provided by EDR.</p>	The presence of former LUST cases, the mineral oil spill and USTs may have impacted the property.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
28	Pepco Benning Road Generating Station	3300 Benning Road, NE	HMIRS, ERNS, PA Manifest, EPA Watch List, FINDS, RCRA-LQG, PADS, DC LUST	<p>In 2000, 5 gallons of fuel oil were released from a transport tanker due to a defective fitting. No response action was reported by EDR. In 2001, 0.5 gallons of fuel oil was released while unloading and overflowing the tank. The release was contained and no further action was performed. In 1990, EDR reported 1,000 gallons of hydrochloric acid cleaning solution leaked from a valve on a line going to a boiler. Approximately 100 gallons was mixed with water and released into the storm drain. The remaining volume was returned to the boiler or recovered with sorbents. This property is listed in the PA Manifest database for transport and disposal of material containing lead. In 2012, the property was identified by the EPA for potential clean water act violations. In 1990, one gallon of transformer oil that contains PCBs was released on concrete from a damaged inactive transformer. Solvents were used to clean up the release. The following is generated and/or accumulated on the property: ignitable hazardous waste; corrosive hazardous waste; lead; benzene; carbon tetrachloride; reactive hazardous waste; cadmium; mercury; spent halogenated solvents; spent non-halogenated solvents; and methylbenzene. Based on a review of manifest data provided by EDR, lead and ignitable hazardous waste have/are properly disposed. Additional manifest data was not provided by EDR for the remaining hazardous waste. The property has received numerous violations and underwent compliance inspections. During the removal of a waste oil tank in 1989 soil impact was reported; however, the regulatory status is closed.</p>	The property is on the EPA watch list, is a RCRA LQG with undocumented disposal records based on data provided, and on the LUST and PADS database.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
29	No Name	3937 Benning Road, NE	DC Historic UST	EDR reported a UST is or has been located on the property. No additional information is provided.	The presence of a UST without any closure documentation may have impacted the property.
30	Benning Branch Library	3935 Benning Road, NE	DC LUST, DC UST, DC RGA LUST	Soil contamination was reported during the closure of a waste oil UST in 2009. The regulatory status is closed. One-3,000 gallon heating oil UST was reported as permanently out of use; however, no closure documentation is provided. This property is suspected to be part of the above property located at 3937 Benning Road, NE.	The listing on the LUST database and potential UST on the property indicates impact is likely.
31	East River Park Limited Partnership	3919 Benning Road, NE	ICIS, FINDS, DC UST	EDR reported one-5,000 gallon diesel UST on the property. No additional information was provided by EDR.	The presence of a UST may have impacted the property.
32	Mary's Progressive Dry Cleaners	3907 Benning Road, NE	US Historic Cleaners	EDR identified a dry cleaners on the property from at least 2001 through 2002	The presence of a historic dry cleaners and the absence of disposal records indicates there may be impact on the property.
33	Paul's Esso Service Station (also listed as Benning Amoco Service Station and Elbee All American Service Station)	3901 Benning Road, NE	DC Historic UST, US Historic Auto Station	EDR reported a gas/service station on the property from at least 1943 through 1964. No additional information was provided.	The presence of USTs may have impacted the property.
34	Shop Express/Prev Chevron	3900 and 3908 Benning Road, NE	DC LUST, DC RGA LUST	EDR reported an open case at this property as a result of a gasoline release in 2008. Soil and groundwater impact was identified.	An open case with soil and groundwater impact.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
35	Watson Brothers Texaco (also listed as Penfield Brothers, Benning Service Station)	4001 Minnesota Avenue, NE	US Historic Auto Station	EDR reported the property has been a gas/service station from at least 1943 through 1960. No additional information was provided by EDR	The presence of a historic gas/service station may have impacted the property.
36	No Name	4008-4010 Minnesota Avenue, NE	DC Brownfields	The property was identified by EDR as a Brownfield. Brownfield properties are historically impacted properties that have or are being re-developed.	The identification of the property on the Brownfield database indicates the property is likely impacted.
37	No Name	4012 Minnesota Avenue, NE	DC Brownfields	The property was identified by EDR as a Brownfield. Brownfield properties are historically impacted properties that have or are being re-developed. It is suspected that this property is associated with the above property located at 4008-4010 Minnesota Avenue, NE.	The identification of the property on the Brownfield database indicates the property is likely impacted.
38	No Name	4016-4018 Minnesota Avenue, NE	DC Brownfields	The property was identified by EDR as a Brownfield. Brownfield properties are historically impacted properties that have or are being re-developed. It is suspected that this property is associated with the above property located at 4012 Minnesota Avenue, NE.	The identification of the property on the Brownfield database indicates the property is likely impacted.
39	San Wah	4016 Minnesota Avenue, NE	US Historic Cleaners	EDR reported the property has been a dry cleaners from at least 1948 through 1954. It is suspected that this property is associated with the above Brownfield property located at 4016-4018 Minnesota Avenue, NE.	The presence of a historic dry cleaners and the absence of disposal records indicates there may be impact on the property.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
40	Partk 7 Apt	4020 Minnesota Avenue, NE	DC UST	EDR Reported one-1,000 gallon heating oil UST is permanently out of use on the property. No additional information was provided.	The presence of a UST and no closure information indicates that impact may be present.
41	No Name	4024 Minnesota Avenue, NE	DC Brownfields	The property was identified by EDR as a Brownfield. Brownfield properties are historically impacted properties that have or are being re-developed. It is suspected that this property is associated with the above properties located at 4008 through 4020 Minnesota Avenue, NE.	The identification of the property on the Brownfield database indicates the property is likely impacted.
42	No Name	4030 Minnesota Avenue, NE	DC Brownfields	The property was identified by EDR as a Brownfield. Brownfield properties are historically impacted properties that have or are being re-developed. It is suspected that this property is associated with the above properties located at 4008 through 4024 Minnesota Avenue, NE.	The identification of the property on the Brownfield database indicates the property is likely impacted.
43	No Name	4032 Minnesota Avenue, NE	DC Brownfields	The property was identified by EDR as a Brownfield. Brownfield properties are historically impacted properties that have or are being re-developed. It is suspected that this property is associated with the above properties located at 4008 through 4030 Minnesota Avenue, NE.	The identification of the property on the Brownfield database indicates the property is likely impacted.
44	No Name	4036 Minnesota Avenue, NE	DC Brownfields	The property was identified by EDR as a Brownfield. Brownfield properties are historically impacted properties that have or are being re-developed. It is suspected that this property is associated with the above properties located at 4008 through 4032 Minnesota Avenue, NE.	The identification of the property on the Brownfield database indicates the property is likely impacted.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
45	No Name	4042 Minnesota Avenue, NE	DC Brownfields	The property was identified by EDR as a Brownfield. Brownfield properties are historically impacted properties that have or are being re-developed. It is suspected that this property is associated with the above properties located at 4008 through 4036 Minnesota Avenue, NE.	The identification of the property on the Brownfield database indicates the property is likely impacted.
46	Douglas Development Corporation	4045 Minnesota Avenue, NE	DC LUST, DC RGA LUST	The property was identified by EDR as a LUST case resulting from soil impact in 1998. The case is closed and no additional information was provided by EDR.	The listing of the property on the LUST database indicates impact may be present.
47	Autozone # 1151	4045 Minnesota Avenue, NE	RCRA - CESQG	Generates and/or accumulates corrosive hazardous waste and mercury. No violations were reported by EDR. The property was not identified in a disposal manifest database.	The presence of hazardous materials and lack of disposal documentation may have resulted in improper disposal and impacted the property.
48	No Name	4046 Minnesota Avenue, NE	DC Brownfields	The property was identified by EDR as a Brownfield. Brownfield properties are historically impacted properties that have or are being re-developed. It is suspected that this property is associated with the above properties located at 4008 through 4042 Minnesota Avenue, NE.	The identification of the property on the Brownfield database indicates the property is likely impacted.
49	No Name	4048 Minnesota Avenue, NE	DC Brownfields	The property was identified by EDR as a Brownfield. Brownfield properties are historically impacted properties that have or are being re-developed. It is suspected that this property is associated with the above properties located at 4008 through 4046 Minnesota Avenue, NE.	The identification of the property on the Brownfield database indicates the property is likely impacted.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
50	Gill's Valet	4051 Minnesota Avenue, NE	FINDS, US AIRS	EDR identified this property as a drycleaner with no compliance violations.	The presence of a drycleaner on the property and lack of disposal documentation indicates improper disposal could have occurred.
51	No Name	4052 Minnesota Avenue, NE	DC Brownfields	The property was identified by EDR as a Brownfield. Brownfield properties are historically impacted properties that have or are being re-developed. It is suspected that this property is associated with the above properties located at 4008 through 4048 Minnesota Avenue, NE.	The identification of the property on the Brownfield database indicates the property is likely impacted.
52	No Name	4063 Minnesota Avenue, NE	US Historic Cleaners	EDR reported a dry cleaners has been located on the property from at least 1999 through 2007. No additional information was provided by EDR.	The presence of a drycleaner on the property and lack of disposal documentation indicates improper disposal could have occurred.
53	No Name	4065 Minnesota Avenue, NE	DC Historic UST	A 2,000 gallon heating oil UST was reported on the property. No additional information was provided.	The presence of a former UST on the property with no closure information may have impacted the property.
54	River Terrace Valet	3427 & 3429 Benning Road, NE	US Historic Cleaners	EDR reported a dry cleaners has been located on the property from atleast 1954 through 1964. No additional information was provided by EDR.	The presence of a drycleaner on the property and lack of disposal documentation indicates improper disposal could have occurred.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
55	Costa's Service Station	3401 Benning Road, NE	US Historic Auto Station	EDR reported a gas/service station has been located on the property from at least 1948 through 2010. No additional information has been provided by EDR.	The presence of a historic gas/service station may have impacted the property.
56	Transco, Inc. (also listed as Distric Cab)	3399 Benning Road, NE	FINDS, DC UST, DC Historic UST, RCRA-CESQG, NJ Manifest	EDR reported one-5,000 gallon waste oil and one-5,000 gallon heating oil UST are located on the property. The waste oil UST is reportedly permanently out of use. No additional information was provided by EDR. Generates and/or accumulates ignitable hazardous waste and spent halogenated solvents. Administrative and compliance violations were reported. Manifest data was provided by EDR; however, waste codes were not provided and it is unclear what waste stream was disposed of.	The presence of former USTs on the property with no closure information may have impacted the property. The generation and/or accumulation of ignitable hazardous waste and spent halogenated solvents with no documented disposal information is of concern.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
57	Pepco Transformer Station	3400 Benning Road, NE	FINDS, ERNS, EPA Watch List,	<p>In November 2011, a response was conducted following a release of 500 gallons of fuel oil to the ground surface from equipment failure on a tanker truck. No additional information was provided by EDR. In December 2010, a sheen was identified on the Anacostia River. The source was unknown and the DC Department of Energy investigated. No additional information was provided by EDR. The property was identified on the FINDS database as the following: hazardous waste biennial reporter; electric generator; criteria and hazardous air pollutant inventory; and greenhouse gas reporter. The property was identified on the EPA Watch List as a Clean Air Act facility.</p> <p>In August 2001, a transformer was damaged and approximately 78 gallons of oil was released. EDR reported an unknown volume entered a storm drain and the remaining was contained by boom. The DC DOH was notified. No additional information was provided by EDR.</p>	The identification of the property as a hazardous waste biennial reporter and electric generator may have residual impacts on the property. Furthermore, the reported November 2011 release and no documented recovery activities suggest that impact may remain.
58	Pepco	Foote Street, NE	DC UST	EDR reported one-2,000 gallon gasoline UST and one-2,000 gallon diesel UST permanently out of use. No additional information was provided by EDR.	The presence of USTs with no closure information may have impacted the property.
59	Smart Esso Service Station	3465 Benning Road, NE	DC Historic UST, US Historic Auto Station	EDR reported a UST on the property and a historic gas/service station in 1960. No additional information was provided by EDR.	The reported historic gas/service station and former UST may have impacted the property.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
60	Dynasty Auto Body & Transmission	3621 Benning Road, NE	RCRA NonGen/NLR	Generates and/or accumulates the following: ignitable hazardous waste; benzene; tetrachloroethene; trichloroethene; and spent non-halogenated solvents. Compliance and administrative violations were reported by EDR. The property was not identified in a disposal manifest database.	The lack of disposal documentation suggests there may be a possibility of improper disposal resulting in impact to the property.
61	Farr Chase Rear	3617 Benning Road, NE	US Historic Auto Station	EDR reported an automobile repair facility in 1931 on the property. No additional information was provided by EDR.	The presence of a former service station and lack of additional information is of concern.
62	River Terrace Elementary School	420 34th Street, NE	DC UST, RCRA NonGen/NLR	EDR reported one-4,000 gallon heating oil UST that is temporarily out of use is located on the property. No additional information was provided by EDR. Generates and/or accumulates ignitable and corrosive hazardous waste. No violations were reported by EDR. The property was not identified in a disposal manifest database.	The presence of a UST and lack of disposal documentation for the reported hazardous waste may have impacted the property.
63	Warehouse (also listed as Ricks Auto Clinic)	3705 Benning Road, NE	DC UST, RCRA NonGen/NLR, FINDS	EDR reported two-3,000 gallon gasoline USTs on the property with a status of permanently out of use. Generates and/or accumulates the following: ignitable hazardous waste; benzene; and tetrachloroethene. Administrative violations were reported by EDR. The property was not identified in a disposal manifest database.	The presence of a UST and lack of disposal documentation for the reported hazardous waste may have impacted the property.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
64	No Name	3701 Benning Road, NE	DC Historic UST	EDR reported a UST is located on the property. No additional information was provided.	The presence of a UST may have impacted the property.
65	Benning Service Station	3902 Benning Road, NE	US Historic Auto Station	EDR reported the property was a gas/service station in 1940.	The presence of a historic gas/service station may have impacted the property.
66	Woolworth's	3932 Minnesota Avenue, NE	DC UST, DC Historic UST, DC LUST, DC RGA LUST	One-1,500 gallon heating oil UST was reported as permanently out of use and in 1997 as a LUST case for soil contamination; however, the case is closed.	Reported soil contamination.
67	Trak Auto (also listed as Supertrak #624)	3925 Minnesota Avenue, NE	DC UST, RCRA NonGen/NLR, FINDS	EDR reported one-500 gallon waste oil UST permanently out of use. No additional information was provided. EDR did not report hazardous waste generated or stored. No violations were reported.	The presence of a UST may have impacted the property.
68	Senator Square Apartments	3948 Minnesota Avenue, NE	DC UST	EDR reported one 2,000 gallon heating oil UST located on the property with a status of permanently out of use. No additional information is provided by EDR.	The presence of a previous UST may have impacted the property.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
69	No Name	4001 Benning Road, NE	ERNS	EDR reported a Pepco transformer was damaged due to high winds in April 2007 resulting in a release of 75 gallons of transformer oil of which 25 gallons reached the storm drain and discharged to the Anacostia River. Absorbent booms were applied during the response. No additional information was provided.	An unknown volume of transformer oil was either recovered or released to the ground surface.
70	Rainbow Cleaners	3915 Dix Street, NE	US Historic Cleaners	EDR reported the property was a dry cleaners from at least 2001 through 2012. No additional information was provided.	The presence of a drycleaner on the property and lack of disposal documentation indicates improper disposal could have occurred.
71	Apartment Building	4321 Brooks Street, NE	DC UST	EDR reported one-8,000 gallon heating oil UST is located on the property and currently in use. No additional information was provided.	The presence of a UST may have impacted the property.
72	CVS Pharmacy #0022	320 40th Street, NE	RCRA-LQG, PA Manifest	Generates and/or accumulates the following: ignitable hazardous waste; corrosive hazardous waste; mercury; silver; and pharmaceuticals. No violations reported. The property was identified on the PA Manifest database; however, specific hazardous waste disposal listings were not on the database.	The lack of specific hazardous waste stream disposal documentation indicates there may be improper disposal.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
73	Safeway Store # 1177	320 40th Street, NE	RCRA-CESQG	Generates and/or accumulates mercury on the property. No violations were reported. The property was not listed on a disposal database.	The lack of disposal documentation indicates there may be improper disposal.
74	No Name	4228 Benning Road, NE	DC Historic UST	EDR reported one 2,000 gallon heating oil UST currently in use is located on the property. No additional information was provided.	The presence of a UST may have impacted the property.
75	Laundry Center	4449 Benning Road, NE	US Historic Cleaners	EDR reported the property was a former dry cleaner in 1964. No additional information was provided.	The presence of a former dry cleaner may have impacted the property.
76	Action Auto Service Station	4435 Benning Road, NE	US Historic Auto Station	EDR reported a gasoline station was located on the property from at least 1954 through 1964. No additional information was provided.	The presence of a former gas station may have impacted the property.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
77	No Name	4425 Benning Road, NE	DC Historic UST	EDR reported a former or current UST is located on the property. No additional information was provided.	The presence of a former or current UST may have impacted the property.
78	Citgo (also listed as Sunoco Service Station and Rodney's Sunoco Service Station)	4400 Benning Road, NE	US AIRS, RCRA NonGen/NLR, DC LUST, DC UST, DC RGA LUST, US Historic Auto Station	Identified on the AIRS database for potential uncontrolled hydrocarbon emissions (< 100 tons/yr). No violations reported. EDR reported ignitable hazardous waste is generated and/or accumulated on the property. No violations or record of disposal was reported. Soil and groundwater impact was identified on the property as a result of leaking gasoline and waste oil USTs; however, the case was closed in 1998. EDR reported four 10,000 gallon and one 4,000 gallon gasoline USTs are permanently out of use on the property. One 8,000 gallon and one 12,000 gallon gasoline USTs are reportedly in use on the property. The property was reportedly a gas/service station from at least 1960 through the present time.	Soil and groundwater impact has been identified on the property.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
79	Former Amoco Oil Company (also listed as Jessie's Service Station)	4430 Benning Road, NE	DC LUST, DC UST, DC RGA LUST, US Historic Auto Station	The property reportedly has an open LUST case for soil and groundwater impact resulting from a gasoline UST closure. One-500 gallon gasoline and five-1,000 gallon gasoline USTs were reported as permanently out of use. EDR reported the property was used as a gasoline/service station from atleast 1940 through 1964.	Soil and groundwater impact has been identified on the property.
81	Spur Oil Company	4413 Benning Road, NE	US Historic Auto Station	EDR reported a gasoline station was located on the property from at least 1960 through 1964.	The presence of a former gas station may have impacted the property.
82	No Name	4409-4417 Benning Road, NE	DC Historic UST	EDR reported two-15,000 gallon heating oil USTs currently in use on the property. No additional information was provided.	The presence of heating oil USTs with no regulatory status is of concern.
83	Electronic Cleaners	4407 Benning Road, NE	EDR US Historic Cleaners	EDR reported a dry cleaners was located on the property from at least 1954 through 1960. No additional information was provided.	The presence of a former dry cleaner may have impacted the property.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
84	Dingo Ho Modern Laundry	4380 Benning Road, NE	EDR US Historic Cleaners	EDR reported a dry cleaners was located on the property from at least 1954 through 1964. No additional information was provided.	The presence of a former dry cleaner may have impacted the property.
85	United Health Care at East of the River (Ward 6)	123 45th Street, NE	PA Manifest, RCRA-CESQG	EDR reported the following hazardous waste is generated and/or accumulated on the property: ignitable hazardous waste; mercury; and silver; however, disposal records were only identified for silver. No violations were reported.	The lack of disposal documentation for ignitable hazardous waste and mercury indicate improper disposal may have occurred and impacted the property.
86	DPW-FMA 6th District Fuel Site	100 42nd Street, NE	DC RGA LUST, DC LUST, DC UST, RCRA-CESQG	EDR identified a closed LUST case reported in June 1989 for gasoline impacted soil and groundwater. EDR reported three 10,000 gallon gasoline USTs and one-1,000 gallon diesel UST permanently out of use. One 10,000 gallon gasoline and one-10,000 gallon diesel UST were reported as currently in use on the property. EDR reported ignitable hazardous waste and mercury is generated and/or accumulated on the property. No violations were reported and no disposal documentation was identified.	Soil and groundwater impact has been identified on the property.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
89	Exxon 2-7707 (also listed as Musolino's Service Station)	4501 Benning Road, NE	DC UST, US Historic Auto Station, DC LUST, DC RGA LUST, RCRA NonGen/NLR	EDR reported two-8,000 gallon gasoline and one-10,000 gallon gasoline USTs currently in use on the property. One 1,000 gallon waste oil UST was identified on the property. The property was reported as a gasoline/service station from at least 1940 through the present time. EDR reported a closed LUST case for soil and groundwater contamination from a gasoline UST. Ignitable hazardous waste and benzene is generated and/or accumulated on the property; however, no violations were reported. The property was not identified on a disposal database.	Soil and groundwater impact has been identified on the property.
90	Kerns Service Station	4500 Benning Road, NE	US Historic Auto Station	The property was identified as a gas/service station from at least 1940 through 1964. No additional information was provided.	The property may have been impacted by the historic gas/service station.
91	No Name	17 46th Street, NE	DC Historic UST	A 2,000 gallon heating oil UST currently in use was reported on the property. No additional information was provided.	The presence of a current or historic UST may have impacted the property.

Table F-1: EDR-Listed Recognized Environmental Conditions Sites

REC #	Facility Name	Physical Address	Database	EDR Summary	Rationale
92	Benco Shopping	4510 - 4528 Benning Road, SE	DC VCP	EDR reported trichloroethene impacted soil and groundwater on the property. A no further action was issued in May 2009.	Soil and groundwater impact has been identified on the property.
93	No Name	4525 East Capitol Street, SE	DC UST, DC Historic UST	EDR reported one-1,000 gallon waste oil UST is permanently out of use on the property. No additional information was provided.	The presence of a former UST on the property with no closure information may have impacted the property.
94	Humble Oil Station	4500 Benning Road, SE	DC UST, DC Historic UST	EDR reported two-8,000 gallon gasoline and one-4,000 gallon gasoline USTs are permanently out of use on the property. No additional information was provided.	The presence of former USTs on the property with no closure information may have impacted the property.

Table F-2: Other Recognized Environmental Condition Sites

REC #	Facility Name	Physical Address	Database	Data Source
95	Power Fuel & Transport LLC Gas Station	4519 Benning Rd	2013 List of District Open LUST-Voluntary Remediation Action Program (VRAP) Cases	8/10/2012 Case Number:2012023 Facility ID: 7-000208 company Name: Power Fuel & Transport LLC Gas Station Address 4519 Benning Rd Notification Date of Regulatory Action Required : 8/7/2012 Soil and GW impacts
96	CSX Benning Yard	Alexandria Extension of the CSX Capital Subdivision	NA	NA

Benning Road

Washington, DC 20002

Inquiry Number: 3839903.5s

January 28, 2014

EDR DataMap™ Corridor Study

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

TARGET PROPERTY INFORMATION

ADDRESS

WASHINGTON, DC 20002
WASHINGTON, DC 20002

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records within the requested search area for the following databases:

FEDERAL RECORDS

NPL	National Priority List
Proposed NPL	Proposed National Priority List Sites
Delisted NPL	National Priority List Deletions
NPL LIENS	Federal Superfund Liens
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CERC-NFRAP	CERCLIS No Further Remedial Action Planned
LIENS 2	CERCLA Lien Information
CORRACTS	Corrective Action Report
RCRA-TSDF	RCRA - Treatment, Storage and Disposal
RCRA-SQG	RCRA - Small Quantity Generators
US ENG CONTROLS	Engineering Controls Sites List
US INST CONTROL	Sites with Institutional Controls
US CDL	Clandestine Drug Labs
US BROWNFIELDS	A Listing of Brownfields Sites
DOD	Department of Defense Sites
FUDS	Formerly Used Defense Sites
LUCIS	Land Use Control Information System
CONSENT	Superfund (CERCLA) Consent Decrees
ROD	Records Of Decision
UMTRA	Uranium Mill Tailings Sites
DEBRIS REGION 9	Torres Martinez Reservation Illegal Dump Site Locations
ODI	Open Dump Inventory
US MINES	Mines Master Index File
TRIS	Toxic Chemical Release Inventory System
TSCA	Toxic Substances Control Act
SSTS	Section 7 Tracking Systems
MLTS	Material Licensing Tracking System
RADINFO	Radiation Information Database
RAATS	RCRA Administrative Action Tracking System
RMP	Risk Management Plans
2020 COR ACTION	2020 Corrective Action Program List
LEAD SMELTERS	Lead Smelter Sites
PRP	Potentially Responsible Parties
SCRD DRYCLEANERS	State Coalition for Remediation of Drycleaners Listing
COAL ASH DOE	Steam-Electric Plant Operation Data

EXECUTIVE SUMMARY

US FIN ASSUR.....	Financial Assurance Information
FEMA UST.....	Underground Storage Tank Listing
COAL ASH EPA.....	Coal Combustion Residues Surface Impoundments List
FEDERAL FACILITY.....	Federal Facility Site Information listing
US HIST CDL.....	National Clandestine Laboratory Register
PCB TRANSFORMER.....	PCB Transformer Registration Database

STATE AND LOCAL RECORDS

DC SHWS.....	This state does not maintain a SHWS list. See the Federal CERCLIS list and Federal NPL list.
MD SHWS.....	Notice of Potential Hazardous Waste Sites
MD SWF/LF.....	Permitted Solid Waste Disposal Facilities
MD UIC.....	Underground Injection Wells Database
MD SWRCY.....	Recycling Directory
MD OCPCASES.....	Oil Control Program Cases
MD HIST LUST.....	Recovery Sites
MD UST.....	Registered Underground Storage Tank List
MD HIST UST.....	Historical UST Registered Database
DC AST.....	List of Aboveground Storage Tanks
MD AST.....	Permitted Aboveground Storage Tanks
MD ENG CONTROLS.....	Engineering Controls Site listing
MD INST CONTROL.....	Voluntary Cleanup Program Applicants/Participants
MD VCP.....	Voluntary Cleanup Program Applicants/Participants
MD DRYCLEANERS.....	Registered Drycleaning Facilities
MD BROWNFIELDS.....	Eligible Brownfields Properties
MD NPDES.....	Wastewater Permit Listing
MD AIRS.....	Permit and Facility Information Listing
MD LEAD.....	Lead Inspection Database
DC RGA LF.....	Recovered Government Archive Solid Waste Facilities List
MD LRP.....	Land Restoration Program
MD RGA LUST.....	Recovered Government Archive Leaking Underground Storage Tank
MD RGA HWS.....	Recovered Government Archive State Hazardous Waste Facilities List
MD RGA LF.....	Recovered Government Archive Solid Waste Facilities List

TRIBAL RECORDS

INDIAN RESERV.....	Indian Reservations
INDIAN ODI.....	Report on the Status of Open Dumps on Indian Lands
INDIAN LUST.....	Leaking Underground Storage Tanks on Indian Land
INDIAN UST.....	Underground Storage Tanks on Indian Land
INDIAN VCP.....	Voluntary Cleanup Priority Listing

EDR PROPRIETARY RECORDS

EDR MGP.....	EDR Proprietary Manufactured Gas Plants
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SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified.

Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in ***bold italics*** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

EXECUTIVE SUMMARY

FEDERAL RECORDS

RCRA-LQG: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

A review of the RCRA-LQG list, as provided by EDR, and dated 09/10/2013 has revealed that there are 2 RCRA-LQG sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
POTOMAC ELEC PWR CO BENNING	3300 BENNING RD N E	14	166
CVS PHARMACY #0022	320 40TH STREET NE	27	221

RCRA-CESQG: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

A review of the RCRA-CESQG list, as provided by EDR, and dated 09/10/2013 has revealed that there are 11 RCRA-CESQG sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
MINNESOTA AVENUE EXXON	4100 HUNT PLACE, N. E.	1	4
SPINGARN SHS	2500 BENNING ROAD	5	38
BROWNE JUNIOR HIGH SCHOOL (PUB	26TH STREET & BENNING R	7	85
PHELPS CAREER CENTER HIGH SCHO	704 26TH STREET NE	7	89
FRIENDSHIP COLLEGIATE ACADEMY	4095 MINNESOTA AVENUE N	10	93
STADIUM EXXON	2651 BENNING ROAD NE	11	105
AUTOZONE #1151	4045 MINNESOTA AVENUE N	15	185
TRANSCO INC	3399 BENNING ROAD NE	16	193
SAFEWAY STORE #1177	322 40TH STREET NE	27	224
UNITY HEALTH CARE AT EAST OF T	123 45TH STREET NE	30	237
DPW - 6TH DISTRICT FUELING SIT	100 42ND STREET NE	31	240

RCRA NonGen / NLR: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

A review of the RCRA NonGen / NLR list, as provided by EDR, and dated 09/10/2013 has revealed that there are 13 RCRA NonGen / NLR sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
GREENHOUSE BROTHERS	4001 GAULT PLACE, N. E.	3	31
POTOMAC ELECTRIC POWER CO	12319 OVER POND WAY	6	40

EXECUTIVE SUMMARY

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
WOODSON JUNIOR HIGH SCHOOL (PU	4101 MINNESOTA AVENUE N	10	98
LEES AUTOMOTIVE	3355 BENNING RD NE	13	138
SUNOCO SERVICE STATION	3341 BENNING RD NE	13	141
KENILWORTH MAINTENANCE YARD	3200 BENNING RD NE	13	147
DYNASTY AUTO BODY & TRANSMISSI	3621 BENNING ROAD NE	18	208
RIVER TERRACE ELEMENTARY SCHOO	420 34TH STREET NE	19	212
RICKS AUTO CLINIC	3705 BENNING RD NE	20	214
SUPERTRAK #624	3925 MINNESOTA AVENUE N	23	218
SUNOCO SERVICE STATION	4400 BENNING RD NE	29	228
BASS CIRCLE APARTMENTS	4505 BENNING ROAD NE	33	248
EXXONMOBIL CORP #27707	4501 BENNING ROAD NE	33	252

ERNS: The Emergency Response Notification System records and stores information on reported releases of oil and hazardous substances. The source of this database is the U.S. EPA.

A review of the ERNS list, as provided by EDR, and dated 09/30/2013 has revealed that there are 9 ERNS sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
Not reported	2600 BENNING RD., NE	9	92
Not reported	CORNER BENNING AVE. & O	12	133
Not reported	3200 BENNING RD. N.E.	13	149
Not reported	3300 BENNING RD NE	14	155
Not reported	3300 BENNING RD N.E.	14	166
Not reported	3400 BENNING ROAD NE	16	204
Not reported	3400 BENNING ROAD NE	16	204
Not reported	3400 BENNING RD. NE	16	207
Not reported	4001 BENNING RD	24	220

HMIRS: The Hazardous Materials Incident Report System contains hazardous material spill incidents reported to the Department of Transportation. The source of this database is the U.S. EPA.

A review of the HMIRS list, as provided by EDR, and dated 09/30/2013 has revealed that there are 2 HMIRS sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
Not reported	3300 BENNING ROAD	14	155
Not reported	3300 BENNING ROAD	14	155

Department of Transportation, Office of Pipeline Safety Incident and Accident data.

A review of the DOT OPS list, as provided by EDR, and dated 07/31/2012 has revealed that there is 1 DOT OPS site within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
WASHINGTON GAS LIGHT CO	4414 BENNING ROAD, NE	29	232

EXECUTIVE SUMMARY

FTTS: FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act) over the previous five years. To maintain currency, EDR contacts the Agency on a quarterly basis.

A review of the FTTS list, as provided by EDR, and dated 04/09/2009 has revealed that there is 1 FTTS site within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
<i>FRIENDSHIP EDISON PCS - WOODSO</i>	<i>4095 MINNESOTA AVE NE</i>	<i>10</i>	<i>95</i>

HIST FTTS: A complete administrative case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

A review of the HIST FTTS list, as provided by EDR, and dated 10/19/2006 has revealed that there is 1 HIST FTTS site within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
<i>FRIENDSHIP EDISON PCS - WOODSO</i>	<i>4095 MINNESOTA AVE NE</i>	<i>10</i>	<i>95</i>

ICIS: The Integrated Compliance Information System (ICIS) supports the information needs of the national enforcement and compliance program as well as the unique needs of the National Pollutant Discharge Elimination System (NPDES) program.

A review of the ICIS list, as provided by EDR, and dated 07/20/2011 has revealed that there are 6 ICIS sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
EDISON FRIENDSHIP - WOODSON CA	4095 MINNESOTA AVE, NE	10	94
STADIUM EXXON	2651 BENNING ROAD, N. E	11	101
BENNING ROAD SHELL	3355B BENNING ROAD NE	13	133
NATL PARK SVC	3200 BENNING RD., NE	13	145
SOLID WASTE REDUCTION CENTER	3200 BENNING ROAD NE	13	153
EAST RIVER PARK LIMITED PARTNE	3919 BENNING ROAD, NE	15	178

PADS: The PCB Activity Database identifies generators, transporters, commercial storers and/or brokers and disposers of PCBs who are required to notify the United States Environmental Protection Agency of such activities. The source of this database is the U.S. EPA.

A review of the PADS list, as provided by EDR, and dated 06/01/2013 has revealed that there is 1 PADS site within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
<i>POTOMAC ELEC PWR CO BENNING</i>	<i>3300 BENNING RD N E</i>	<i>14</i>	<i>166</i>

EXECUTIVE SUMMARY

FINDS: The Facility Index System contains both facility information and "pointers" to other sources of information that contain more detail. These include: RCRIS; Permit Compliance System (PCS); Aerometric Information Retrieval System (AIRS); FATES (FIFRA [Federal Insecticide Fungicide Rodenticide Act] and TSCA Enforcement System, FTTS [FIFRA/TSCA Tracking System]; CERCLIS; DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes); Federal Underground Injection Control (FURS); Federal Reporting Data System (FRDS); Surface Impoundments (SIA); TSCA Chemicals in Commerce Information System (CICS); PADS; RCRA-J (medical waste transporters/disposers); TRIS; and TSCA. The source of this database is the U.S. EPA/NTIS.

A review of the FINDS list, as provided by EDR, and dated 03/08/2013 has revealed that there are 23 FINDS sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
FRIENDSHIP EDISON COLLEGIATE A	4095 MINNESOTA AVE, NE	10	95
FRIENDSHIP EDISON PCS (WOODSO	4100 MINNESOTA AVENUE,	10	97
COWBOYS CLEANERS	1115 COKER ST	10	100
STADIUM EXXON	2651 BENNING ROAD, N. E	11	103
DAG PETROLEUM MANAGEMENT INCOR	3355 BENNING ROAD NORTH	13	134
BENNING ROAD SHELL	3355B BENNING ROAD NE	13	135
SW ROOFING	25330 FIVE POINTS RD	13	136
SUNOCO SERVICE STATION	3341 BENNING RD NE	13	141
AUTO CARE INCORPORATED	3341 BENNING ROAD N.E.	13	143
SOLID WASTE REDUCTION CENTER	3200 BENNING ROAD NE	13	151
MELMS GRAVEL	48W760 MELMS RD	13	152
NATL PARK SVC	3200 BENNING RD., NE	13	154
PEPCO- BENNING GENERATING PLAN	3300 BENNING ROAD N.E.	14	166
EAST RIVER PARK LIMITED PARTNE	3919 BENNING ROAD, NE	15	178
RYANS EXPRESS DRY CLEANERS	216 BENDER RD.	15	184
GILL'S VALET	4051 MINNESOTA AVENUE,	15	187
TRANSCO INC	3399 BENNING ROAD NE	16	192
PEPCO TRANSFORMER STATION	3400 BENNING ROAD	16	203
PEPCO KENILWORTH FUELING STATI	3400 BENNING ROAD, NE	16	204
POTOMAC POWER RESOURCES BENNIN	3400 BENNING ROAD NE	16	205
DYNASTY AUTO BODY & TRANSMISSI	3621 BENNING ROAD NE	18	210
RICKS AUTO CLINIC	3705 BENNING RD NE	20	214
SUPERTRAK #624	3925 MINNESOTA AVENUE N	23	218

US AIRS: The database is a sub-system of Aerometric Information Retrieval System (AIRS). AFS contains compliance data on air pollution point sources regulated by the U.S. EPA and/or state and local air regulatory agencies. This information comes from source reports by various stationary sources of air pollution, such as electric power plants, steel mills, factories, and universities, and provides information about the air pollutants they produce. Action, air program, air program pollutant, and general level plant data. It is used to track emissions and compliance data from industrial plants.

A review of the US AIRS list, as provided by EDR, and dated 10/23/2013 has revealed that there are 8 US AIRS sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
MINNESOTA AVENUE EXXON	4100 HUNT PLACE, N. E.	1	4
GREENHOUSE BROTHERS	4001 GAULT PLACE, N. E.	3	31
PEPCO BENNING ROAD STATION	3400 BENNING ROAD, NE	6	43
STADIUM EXXON	2651 BENNING ROAD NE	11	105
DAG PETROLEUM MANAGEMENT INC.	3355 BENNING ROAD, N.E.	13	136
AUTO CARE INCORPORATED	3341 BENNING ROAD N.E.	13	144
GILL'S VALET	4051 MINNESOTA AVENUE,	15	187

EXECUTIVE SUMMARY

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
CITGO	4400 BENNING RD NE	29	226

EPA WATCH LIST: EPA maintains a "Watch List" to facilitate dialogue between EPA, state and local environmental agencies on enforcement matters relating to facilities with alleged violations identified as either significant or high priority. Being on the Watch List does not mean that the facility has actually violated the law only that an investigation by EPA or a state or local environmental agency has led those organizations to allege that an unproven violation has in fact occurred. Being on the Watch List does not represent a higher level of concern regarding the alleged violations that were detected, but instead indicates cases requiring additional dialogue between EPA, state and local agencies - primarily because of the length of time the alleged violation has gone unaddressed or unresolved.

A review of the EPA WATCH LIST list, as provided by EDR, and dated 06/30/2013 has revealed that there are 2 EPA WATCH LIST sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
PEPCO - BENNING	3300 BENNING ROAD, N.E.	14	165
PEPCO BENNING ROAD STATION	3400 BENNING ROAD, NE	16	207

STATE AND LOCAL RECORDS

DC SWF/LF: Solid Waste Facility Listing.

A review of the DC SWF/LF list, as provided by EDR, and dated 11/18/2010 has revealed that there is 1 DC SWF/LF site within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
BENNING ROAD TRANSFER STATION	3200 BENNING RD., NE	13	152

DC LUST: The Leaking Underground Storage Tank Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the Department of Consumer and Regulatory Affairs' District of Columbia LUST Cases list.

A review of the DC LUST list, as provided by EDR, and dated 10/01/2013 has revealed that there are 13 DC LUST sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
<i>LANGSTON GOLF COURSE</i>	<i>2600 BENNING RD NE</i>	<i>9</i>	<i>92</i>
<i>EXXON S/S #2-1931</i>	<i>2651 BENNING RD NE</i>	<i>11</i>	<i>131</i>
<i>KENILWORTH MAINT. YARD</i>	<i>3200 BENNING RD, NE</i>	<i>13</i>	<i>146</i>
NATIONAL PARK SERVICE	3200 BENNING RD., NE	13	154
<i>BENNING ROAD GEN. STA.</i>	<i>3300 BENNING RD, NE</i>	<i>14</i>	<i>177</i>
<i>BENNING BRANCH LIBRARY</i>	<i>3935 BENNING RD NE</i>	<i>15</i>	<i>177</i>
<i>SHOP EXPRESS / PREV CHEVRON</i>	<i>3900 & 3908 BENNING RD.</i>	<i>15</i>	<i>180</i>
<i>DOUGLAS DEVELOPMENT CORP.</i>	<i>4045 MINNESOTA AVENUE,</i>	<i>15</i>	<i>184</i>
<i>WOOLWORTHS</i>	<i>3932 MINNESOTA AVENUE,</i>	<i>23</i>	<i>217</i>
<i>SUNOCO SERVICE STATION</i>	<i>4400 BENNING RD NE</i>	<i>29</i>	<i>228</i>

EXECUTIVE SUMMARY

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
AMOCO OIL CO (FORMER)	4430 BENNING RD NE	29	231
DPW-FMA 6TH DISTRICT FUEL SITE	100 42ND ST NE	31	239
EXXON	4501 BENNING RD, NE	33	251

DC UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the Department of Consumer & Regulatory Affairs' D.C. UST Database List.

A review of the DC UST list, as provided by EDR, and dated 10/01/2013 has revealed that there are 27 DC UST sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
BIG D LIQUORS	4169 MINNESOTA AV NE	2	31
MT VERNON UNITED METHODIST CHU	4147 MINNESOTA AV NE	3	37
SPINGARN HIGH SCHOOL	2500 BENNING RD NE	5	40
LANGSTON GOLF COURSE	2600 BENNING RD NE	9	92
CARTER WOODSON	4095 MINNESOTA AV NE	10	96
EXXON S/S #2-1931	2651 BENNING RD NE	11	131
BENNING ROAD SHELL	3355 BENNING RD NE	13	134
UNKNOWN	3341 BENNING RD NE	13	140
DC TRANSFER STATION	3200 BENNING RD NE	13	150
BENNING BRANCH LIBRARY	3935 BENNING RD NE	15	177
EAST RIVER PARK SHOPPING CENTE	3919 BENNING RD NE	15	179
PARTK 7 APT	4020 MINNESOTA AV NE	15	182
DISTRICT CAB	3399 BENNING RD NE	16	192
PEPCO	FOOTE ST NE	16	207
AUTO CARE	3621 BENNING RD NE	18	211
RIVER TERRACE ELEMENTARY SCHOO	420 34TH ST NE	19	212
WAREHOUSE	3705 BENNING RD NE	20	214
WOOLWORTH'S	3932 MINNESOTA AV NE	23	217
TRAK AUTO	3925 MINNESOTA AV NE	23	218
SENATOR SQUARE APARTMENTS	3948 MINNESOTA AV SE	23	220
APARTMENT BUILDING	4321 BROOKS ST NE	26	221
SUNOCO SERVICE STATION	4400 BENNING RD NE	29	228
AMOCO OIL CO (FORMER)	4430 BENNING RD NE	29	231
DPW-FMA 6TH DISTRICT FUEL SITE	100 42ND ST NE	31	239
EXXON S/S #2-7707	4501 BENNING RD SE	33	249
UNKNOWN	4525 E CAPITOL ST SE	35	255
HUMBLE OIL STATION	4500 BENNING RD SE	35	255

DC HIST UST: During the process of the database upgrade, all facilities that the UST Program was unable to confirm their existence were removed from the working revelation UST Database before the conversion and put into an excel spreadsheet. These facilities became known as "Project Unknown". This listing is not current and has been not updated.

A review of the DC HIST UST list, as provided by EDR, and dated 12/31/1999 has revealed that there are 15 DC HIST UST sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
UNKNOWN	2501 BENNING RD NE	8	91
UNKNOWN	3341 BENNING RD NE	13	140

EXECUTIVE SUMMARY

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
UNKNOWN	3937 BENNING RD NE	15	177
UNKNOWN	3901 BENNING RD NE	15	179
UNKNOWN	4065 MINNESOTA AV NE	15	191
DISTRICT CAB	3399 BENNING RD NE	16	192
UNKNOWN	3465 BENNING RD NE	17	208
UNKNOWN	R 3701 BENNING RD NE	21	216
WOOLWORTH'S	3932 MINNESOTA AV NE	23	217
UNKNOWN	4228 BENNING RD NE	28	225
UNKNOWN	4425 BENNING RD NE	29	226
UNKNOWN	4409-17 BENNING RD NE	29	234
UNKNOWN	17 46TH ST NE	34	254
UNKNOWN	4525 E CAPITOL ST SE	35	255
HUMBLE OIL STATION	4500 BENNING RD SE	35	255

PA MANIFEST: Hazardous waste manifest information.

A review of the PA MANIFEST list, as provided by EDR, has revealed that there are 6 PA MANIFEST sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
PHELPS HIGH SCHOOL	704 26TH STREET NE	7	88
PEPCO BENNING ROAD GENERATING	3300 BENNING ROAD NE	14	155
CVS PHARMACY 0022	320 40TH ST NE	27	223
UNITY HEALTH CARE AT EAST OF T	123 45TH STREET NE	30	235
BENNING ELEMENTARY SCHOOL	100 41ST STREET NE	32	241
BASS CIRCLE APARTMENTS	4505 BENNING RD NE	33	244

NY MANIFEST: Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a TSD facility.

A review of the NY MANIFEST list, as provided by EDR, has revealed that there are 2 NY MANIFEST sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
POTOMAC ELECTRIC POWER CO	12319 OVER POND WAY	6	40
PEPCO BENNING ROAD STATION	3400 BENNING ROAD, NE	6	43

NJ MANIFEST: Hazardous waste manifest information.

A review of the NJ MANIFEST list, as provided by EDR, has revealed that there are 4 NJ MANIFEST sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
MINNESOTA AVENUE EXXON	4100 HUNT PLACE, N. E.	1	4
PEPCO BENNING ROAD STATION	3400 BENNING ROAD, NE	6	43
STADIUM EXXON	2651 BENNING ROAD NE	11	105
TRANSCO INC	3399 BENNING ROAD NE	16	193

EXECUTIVE SUMMARY

DC VCP: The Voluntary Cleanup Program oversees owner or developer initiated voluntary remediation of contaminated lands and buildings that return actual or potentially contaminated properties to productive uses.

A review of the DC VCP list, as provided by EDR, and dated 06/25/2013 has revealed that there is 1 DC VCP site within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
BENCO SHOPPING	4510-4528 BENNING ROAD,	35	254

DC BROWNFIELDS: A listing of potential brownfields site locations.

A review of the DC BROWNFIELDS list, as provided by EDR, and dated 09/13/2013 has revealed that there are 15 DC BROWNFIELDS sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
Not reported	4098 MINNESOTA AV NE	10	96
Not reported	4100 MINNESOTA AV NE	10	96
Not reported	4108 MINNESOTA AV NE	10	101
Not reported	4112-4114 MINNESOTA AV	10	101
Not reported	4008 - 4010 MINNESOTA A	15	181
Not reported	4012 MINNESOTA AV NE	15	181
Not reported	4016 - 4018 MINNESOTA A	15	182
Not reported	4024 MINNESOTA AV NE	15	182
Not reported	4030 MINNESOTA AV NE	15	183
Not reported	4032 MINNESOTA AV NE	15	183
Not reported	4036 MINNESOTA AV NE	15	183
Not reported	4042 MINNESOTA AV NE	15	183
Not reported	4046 MINNESOTA AV NE	15	186
Not reported	4048 MINNESOTA AV NE	15	186
Not reported	4052 MINNESOTA AV NE	15	190

DC RGA LUST: The EDR Recovered Government Archive Leaking Underground Storage Tank database provides a list of LUST incidents derived from historical databases and includes many records that no longer appear in current government lists.

A review of the DC RGA LUST list, as provided by EDR, has revealed that there are 13 DC RGA LUST sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
LANGSTON GOLF COURSE	2600 BENNING RD NE	9	92
EXXON S/S #2-1931	2651 BENNING RD NE	11	131
KENILWORTH MAINT. YARD	3200 BENNING RD, NE	13	146
BENNING ROAD GEN. STA.	3300 BENNING RD, NE	14	177
BENNING BRANCH LIBRARY	3935 BENNING RD NE	15	177
SHOP EXPRESS / PREV CHEVRON	3900 & 3908 BENNING RD.	15	180
DOUGLAS DEVELOPMENT CORP.	4045 MINNESOTA AVENUE,	15	184
WOOLWORTHS	3932 MINNESOTA AVENUE,	23	217
SUNOCO SERVICE STATION	4400 BENNING RD NE	29	228
AMOCO OIL CO (FORMER)	4430 BENNING RD NE	29	231
Not reported	100 42ND STREET, NE	31	239
DPW-FMA 6TH DISTRICT FUEL SITE	100 42ND ST NE	31	239

EXECUTIVE SUMMARY

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
EXXON	4501 BENNING RD, NE	33	251

EDR PROPRIETARY RECORDS

EDR US Hist Auto Stat: EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

A review of the EDR US Hist Auto Stat list, as provided by EDR, has revealed that there are 19 EDR US Hist Auto Stat sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
RHODES SERVICE STATION	4169 MINNESOTA AVE NE	2	31
HOLLANDS SHELL SERVICE STATION	4131 MINNESOTA AVE NE	4	37
PRICE S ESSO STATION	2651 BENNING RD NE	11	104
SIMS SERVICE STATION	3355 BENNING RD NE	13	133
SULLI S SUNOCO	3341 BENNING RD NE	13	140
HOLMES GEO B	3339 BENNING RD NE	13	145
PAUL S ESSO SERVICE STATION	3901 BENNING RD NE	15	180
WATSON BROTHERS TEXACO CO	4001 MINNESOTA AVE NE	15	180
COSTAS SERVICE STATION	3401 BENNING RD NE	16	191
SMART ESSO SERVICE STATION	3465 BENNING RD NE	17	208
Not reported	3621 BENNING RD NE	18	211
FARR CHAS E REAR	3617 BENNING RD NE	18	212
BENNING SERVICE STATION	3902 BENNING RD NE	22	216
ACTION AUTO SERVICE STATION	4435 BENNING RD NE	29	226
RODNEY S SUNOCO SERVICE STATIO	4400 BENNING RD NE	29	231
JESSIE S SERVICE STATION	4430 BENNING RD NE	29	234
SPUR OIL CO	4413 BENNING RD NE	29	234
MUSOLINO S SERVICE STATION	4501 BENNING RD NE	33	250
KERNS SERVICE STATION	4500 BENNING RD NE	33	253

EDR US Hist Cleaners: EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

A review of the EDR US Hist Cleaners list, as provided by EDR, has revealed that there are 13 EDR US

EXECUTIVE SUMMARY

Hist Cleaners sites within the searched area.

<u>Site</u>	<u>Address</u>	<u>Map ID</u>	<u>Page</u>
MAYFAIR VALET SHOP	3920 HAYES ST NE	2	30
Not reported	4001 GAULT PL NE	3	37
GREENHOUSE BROS	4132 MINNESOTA AVE NE	4	37
ACME REAR	4100 MINNESOTA AVE NE	10	97
Not reported	3907 BENNING RD NE	15	179
SAN WAH	4016 MINNESOTA AVE NE	15	182
Not reported	4063 MINNESOTA AVE NE	15	190
RIVER TERRACE VALET	3429 BENNING RD NE	16	191
RIVER TERRACE VALET	3427 BENNING RD NE	16	191
Not reported	3915 DIX ST NE	25	220
LAUNDRY CENTER	4449 BENNING RD NE	29	225
ELECTRONIC CLEANERS	4407 BENNING RD NE	29	235
DINGO HO MODERN LAUNDRY	4380 BENNING RD NE	29	235

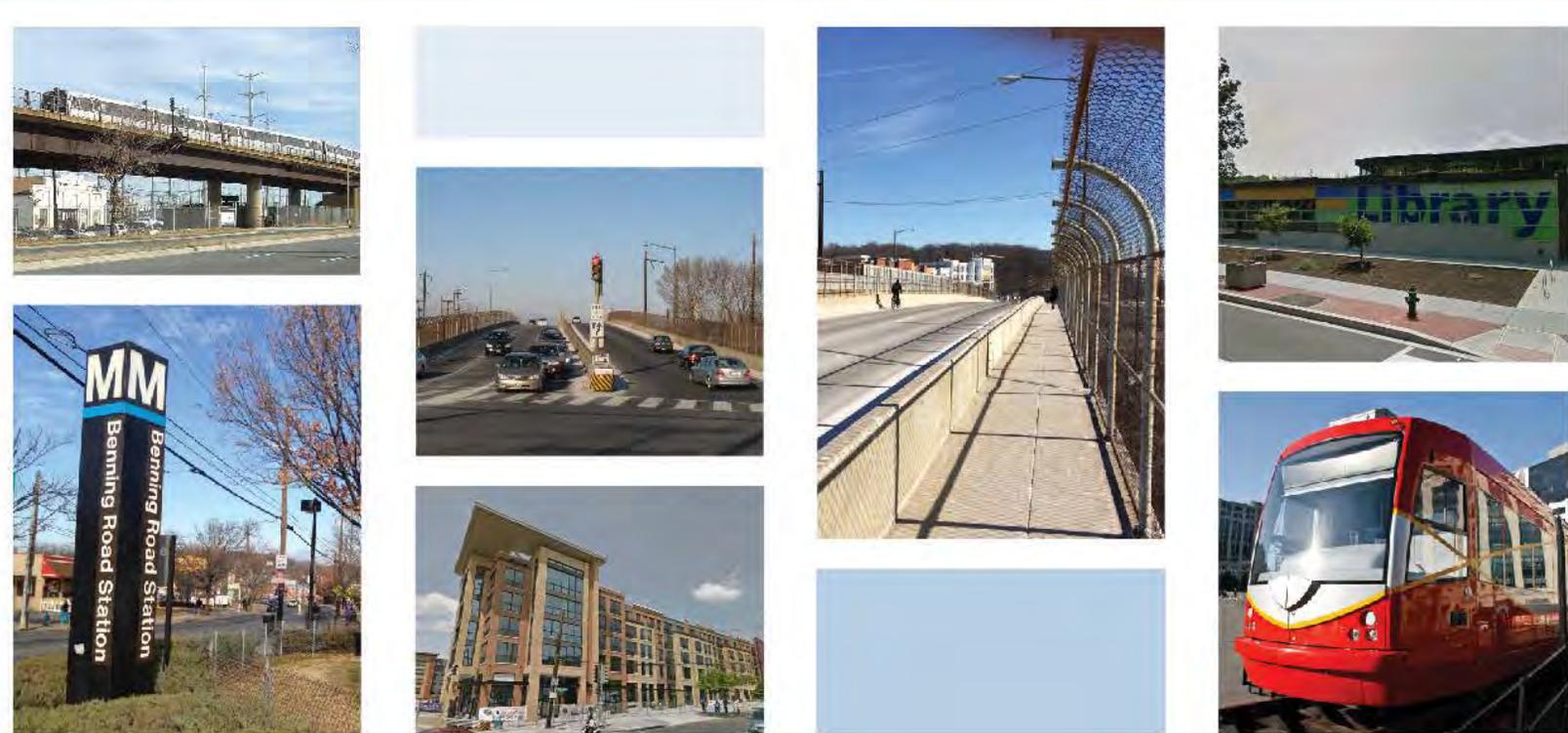
EXECUTIVE SUMMARY

Please refer to the end of the findings report for unmapped orphan sites due to poor or inadequate address information.

BENNING ROAD & BRIDGES TRANSPORTATION IMPROVEMENTS

NOISE AND VIBRATION TECHNICAL MEMORANDUM

FINAL September 2020



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EXECUTIVE SUMMARY

ES-1.0 Purpose

The Federal Highway Administration (FHWA), in coordination with the District Department of Transportation (DDOT), prepared this Environmental Assessment (EA) for the proposed Benning Road and Bridges Transportation Improvements project (the proposed action) in northeast Washington, DC. The proposed action would provide safety improvements, extend H/Benning Streetcar service, and enhance the roadway, pedestrian, and bicycle facilities to accommodate each mode along Benning Road between Oklahoma Avenue and the Benning Road Metrorail Station. FHWA is the lead federal agency for the EA, with DDOT (the Applicant) as the local sponsor. The agencies are preparing a Final Environmental Assessment (EA) for the Preferred Alternative in accordance with the National Environmental Policy Act (NEPA) as well as other federal and local laws.

The purpose of this technical report is to document potential impacts of operation and construction of the Benning Road and Bridges Transportation Improvements project (the proposed action) related to noise and vibration, and to describe mitigation measures, as warranted. The technical report supports and is part of the EA for the proposed action.

ES-2.0 Operational Noise Analysis

ES-2.1 Methodology

The noise assessment of the proposed streetcar service was prepared to comply with National Environmental Policy Act (NEPA) requirements (23 CFR 772) and the guidelines set forth by the Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment* (May 2006). The assessment of traffic-related noise was prepared in accordance with the Federal Highway Administration's (FHWA) guidance *FHWA's Highway Traffic Noise: Analysis and Abatement Guidance* (December 2011).

The operational noise analyses examine Build Alternatives 1 and 2, including the connecting track to the DC Streetcar Car Barn Training Center. Other elements, including the traction powered substations and propulsion system (wired or wireless) would not be sources of noise and, therefore, are not analyzed. Operational traffic noise was also analyzed.

ES-2.2 Affected Environment

The primary source of noise in the study area is roadway traffic on Benning Road, the levels of which exceed FHWA operational noise abatement criteria at adjacent properties in the existing

condition. The primary source of vibration in the study area is roadway traffic on Benning Road. Vibration impacts occur at adjacent properties in the existing condition when trucks or buses travel over discontinuous pavement causing a vibration event.

ES-2.3 Environmental Consequences

ES-2.3.1 No-Build Alternative

The No-Build Alternative will not introduce new sources of noise from the proposed action, and as a result, no new transit noise impacts or new transit vibration impacts will occur under the No-Build Alternative. Noise levels from traffic on Benning Road are predicted to exceed the FHWA's operational noise abatement criteria (NAC) under the No-Build Alternative.

ES-2.3.2 Preferred Alternative

Noise levels from streetcar operations under the Preferred Alternative are predicted to range from 49 to 69 dBA. Nine noise impacts due to streetcar operations are predicted to occur in the study area. Specifically, exceedances of FTA's severe impact criteria are predicted at four residences (or FTA Category 2 land uses) in the vicinity of the track switches at the curve for the DC Streetcar Car Barn Training Center. Exceedances of FTA's moderate impact criteria are predicted at five other residences under the Preferred Alternative (four at the DC Streetcar Car Barn Training Center switches and one near the 42nd Street stop due to rail transit bell ringing). No exceedances of FTA's noise impact criteria are predicted at any Category 1 or 3 land uses.

Traffic noise impacts along Benning Road in the Preferred Alternative are predicted to be like the No-Build Alternative's because the underlying traffic volumes are similar. The calculated worst-case cumulative L_{eq} noise levels for the Preferred Alternative range from 66 to 75 dBA.

Exceedances of the FHWA NAC are predicted at all residences and parks adjacent to Benning Road. The future vehicular traffic along Benning Rd would account for up to 98 percent of the total noise in the Benning Road corridor. Future noise due to streetcar operations would account for an additional two percent of total noise in the Benning Road corridor. As a result, the cumulative noise levels that combine both the streetcar operations and the future traffic under the Preferred Alternative are approximately the same as the peak-hour noise levels predicted to occur under the No-Build Alternative.

ES-2.3.3 Build Alternative 1

Noise levels from streetcar operations under the Build Alternative 1 are predicted to range from 49 to 69 dBA. Thirteen noise impacts due to streetcar operations are predicted to occur in the study area. Specifically, exceedances of FTA's severe impact criteria are predicted at four residences (or FTA Category 2 land uses) in the vicinity of the track switches at the curve for the DC Streetcar Car Barn Training Center. Exceedances of FTA's moderate impact criteria are predicted at nine other residences under the Preferred Alternative (four at the DC Streetcar Car Barn Training Center switches and one near the 42nd Street stop due to rail transit bell ringing). No exceedances of FTA's noise impact criteria are predicted at any Category 1 or 3 land uses.

Traffic noise impacts along Benning Road in the Build Alternative 1 are predicted to be like the No-Build Alternative's because the underlying traffic volumes are similar. The calculated worst-case cumulative L_{eq} noise levels for the Preferred Alternative range from 66 to 75 dBA. Exceedances of the FHWA NAC are predicted at all residences and parks adjacent to Benning Road. The future vehicular traffic along Benning Road would account for up to 98 percent of the total noise in the Benning Road corridor. Future noise due to streetcar operations would account for an additional two percent of total noise in the Benning Road corridor. As a result, the cumulative noise levels that combine both the streetcar operations and the future traffic under Build Alternative 1 are approximately the same as the peak-hour noise levels predicted to occur under the No-Build Alternative.

ES-2.4 Operational Noise impact Mitigation

DDOT will undertake mitigation measures to reduce or eliminate impacts for the Preferred Alternative. These measures include:

- Shifting the 42nd Street stop to the west side of the intersection;
- Installing “spring frogs,” pointless switches or other controls (such as a “well-designed flange-bearing frog”);
- Increasing the radius of the track curves, applying flange lubricators to “grease” the contact points between the steel wheels and the steel rail heads, or procuring streetcar vehicles that can operate effectively along tracks with radii less than 100 feet without causing wheel squeal to occur; and
- Modifying the rail transit bell ringing as safety protocols allow.

Noise impacts would be due to traffic along Benning Road, not the build alternatives, and cannot be mitigated in a “feasible and reasonable” manner in accordance with the DDOT Noise Policy. Due to the number of driveways along Benning Road used to access residences, offices, parks and other properties, noise barriers are not a viable option. Openings in noise barriers degrade the acoustical performance, thereby significantly limiting the benefits they have the potential to provide. Other abatement measures (such as limiting truck traffic, reduced speeds, land-acquisition, buffer zones, etc.) are not feasible given the dense urban character of the study area.

ES-3.0 Operational Vibration Analysis

ES-3.1 Methodology

The vibration assessment of the proposed streetcar service was prepared in accordance with National Environmental Policy Act (NEPA) requirements and the guidelines set forth by the Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment* (May 2006). The operational vibration analyses examine Build Alternatives 1 and 2, including the connecting

track to the DC Streetcar Car Barn Training Center. Other elements, including the traction powered substations and propulsion system (wired or wireless) would not be sources of vibration and, therefore, are not analyzed. Operational traffic vibration impacts are also analyzed.

ES-3.2 Affected Environment

The primary source of vibration in the study area is roadway traffic on Benning Road. Vibration impacts occur at adjacent properties in the existing condition when trucks or buses travel over discontinuous pavement causing a vibration event.

ES-3.3 Environmental Consequences

ES-3.3.1 No-Build Alternative

The No-Build Alternative will not introduce new sources of vibration from the proposed action, and as a result, no new transit vibration impacts, or new transit vibration impacts will occur under the No-Build Alternative. Vibration levels from traffic on Benning Road would be like the levels experienced in the existing conditions because traffic volumes will be similar to those in the existing condition.

ES-3.3.2 Preferred Alternative

The maximum vibration levels using the H/Benning streetcar study information along Benning Road under the Preferred Alternative are predicted to range from 57 to 72 VdB. The default FTA ground-surface vibration levels are predicted to range from 67 VdB to 68 VdB. Exceedances of FTA's frequent vibration impact criterion of 72 VdB are predicted at 20 residences (Category 2 land uses) along Benning Road less than 50 feet from the Preferred Alternative. One exceedance of FTA's impact criterion of 75 VdB is predicted at an institutional receiver (Dorothy I. Height/Benning Neighborhood Library).

Like the No-Build Alternative, traffic, including heavy trucks and buses, would rarely create perceptible ground-borne vibration unless vehicles are operating very close to buildings or there are irregularities in the road, such as potholes or expansion joints.

ES-3.3.3 Build Alternative 1

The maximum vibration levels using the H/Benning streetcar study information along Benning Road under Build Alternative 1 are predicted to range from 58 to 75 VdB. The default FTA ground-surface vibration levels are predicted to range from 67 to 68 VdB. Exceedances of FTA's frequent vibration impact criterion of 72 VdB are predicted at 40 residences (or Category 2 land uses) along Benning Road less than 50 feet from Build Alternative 1. Similarly, one exceedance of FTA's operational vibration impact criterion of 75 VdB is predicted at an institutional receiver (Dorothy I. Height/Benning Neighborhood Library). No exceedances of FTA's operational vibration impact criteria are predicted at any Category 1 land use under Build Alternative 1.

Like the No-Build Alternative, traffic, including heavy trucks and buses, would rarely create perceptible ground-borne vibration unless vehicles are operating very close to buildings or there are irregularities in the road, such as potholes or expansion joints.

ES-3.4 Operational Vibration Impact Mitigation

Mitigation for vibration impacts generated by steel wheel – steel rail interactions will come in the form of ballast mats, spring frogs, pointless switches, flange-bearing frogs, and similar designed to reduce vibration levels by approximately 10 VdB. Other measures which can reduce the severity of vibrations include resilient fasteners, undertie pads, and floating pads. The deployment of these devices will be established during final design.

ES-3.5 Construction Noise and Vibration Impacts and Mitigation

Noise and vibration levels during construction would vary depending on the types of construction activity and equipment used for each stage of work. Activities associated with construction staging and/or material lay down areas would result in noise and vibration impacts if located in sensitive receiver areas. Similarly, there would also be the potential for noise and vibration impacts along detour routes and truck haul routes.

DDOT will develop and implement a construction management plan during project design that includes a Noise, Vibration and Air Quality Management Plan to prescribe practices DDOT will undertake to mitigate noise and vibration impacts from construction as reasonably feasible.

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Table of Contents

1.0	INTRODUCTION	1
1.1	PROPOSED ACTION OVERVIEW	1
1.2	PURPOSE OF REPORT	1
1.1	REGULATORY SETTING	3
1.2	SELECTION DDOT’S PREFERRED ALTERNATIVE.....	3
2.0	OPERATIONAL NOISE ANALYSIS	3
2.1	DESCRIPTORS AND FUNDAMENTALS	3
2.2	EVALUATION CRITERIA	5
2.2.1	<i>FTA Operational Noise Impact Criteria</i>	<i>5</i>
2.2.2	<i>FHWA Noise Abatement Criteria</i>	<i>7</i>
2.3	ASSESSMENT METHODOLOGY.....	8
2.3.1	<i>Consistency with Previous Study.....</i>	<i>8</i>
2.3.2	<i>Existing Conditions Analysis Procedure.....</i>	<i>8</i>
2.3.3	<i>Operational Noise Modeling Assumptions.....</i>	<i>11</i>
2.3.4	<i>FHWA Noise Modeling Validation</i>	<i>13</i>
2.4	AFFECTED ENVIRONMENT – OPERATIONAL NOISE	14
2.5	ENVIRONMENTAL CONSEQUENCES – OPERATIONAL NOISE	16
2.5.1	<i>No-Build Alternative</i>	<i>16</i>
2.5.2	<i>Build Alternative 1</i>	<i>17</i>
2.5.3	<i>Streetcar Operations</i>	<i>17</i>
2.5.4	<i>Traffic Operations</i>	<i>18</i>
2.5.5	<i>Preferred Alternative</i>	<i>20</i>
2.5.6	<i>Streetcar Operations</i>	<i>20</i>
2.5.7	<i>Traffic Operations.....</i>	<i>21</i>
2.5.8	<i>Operational Noise Impact Mitigation.....</i>	<i>23</i>
3.0	OPERATIONAL VIBRATION ANALYSIS	24
3.1	DESCRIPTORS AND FUNDAMENTALS	24
3.1.1	<i>FTA Operational Vibration Impact Criteria.....</i>	<i>25</i>
3.1.2	<i>Operational Vibration Modeling Assumptions</i>	<i>26</i>
3.2	AFFECTED ENVIRONMENT – OPERATIONAL VIBRATION	27
3.3	ENVIRONMENTAL CONSEQUENCES – OPERATIONAL VIBRATION	27
3.3.1	<i>No-Build Alternative</i>	<i>28</i>
3.3.2	<i>Build Alternative 1</i>	<i>28</i>
3.3.3	<i>Streetcar Operations</i>	<i>28</i>
3.3.4	<i>Traffic Operations.....</i>	<i>29</i>

3.3.5	<i>Preferred Alternative</i>	29
3.3.6	<i>Streetcar Operations</i>	29
3.3.7	<i>Traffic Operations</i>	30
3.3.8	<i>Operational Vibration Impacts Mitigation</i>	30
3.4	INDIRECT AND CUMULATIVE EFFECTS.....	31
3.5	CONSTRUCTION NOISE AND VIBRATION IMPACTS AND MITIGATION.....	31
3.5.1	<i>Construction Noise and Vibration Impacts Mitigation</i>	31
4.0	REFERENCES	32

List of Figures

FIGURE 1:	PROPOSED ACTION STUDY AREA.....	2
FIGURE 2:	TYPICAL A-WEIGHTED NOISE LEVELS.....	4
FIGURE 3:	FTA OPERATIONAL NOISE IMPACT CRITERIA.....	6
FIGURE 4:	NOISE MONITORING LOCATIONS	10
FIGURE 5:	BUILD ALTERNATIVE 1 NOISE AND VIBRATION MODELING RESULTS.....	19
FIGURE 6:	PREFERRED ALTERNATIVE NOISE AND VIBRATION MODELING RESULTS.....	22
FIGURE 7:	TYPICAL GROUND-BORNE VIBRATION LEVELS	24
FIGURE 8:	FTA GENERALIZED GROUND SURFACE VIBRATION CURVES.....	27

List of Tables

TABLE 1:	FTA LAND USE CATEGORIES AND NOISE METRICS	6
TABLE 2:	DDOT LAND USE CATEGORIES AND NOISE METRICS	7
TABLE 3:	PEAK-HOUR TRAFFIC VOLUMES AND VEHICLE MIX DATA	13
TABLE 4:	BASELINE SHORT-TERM NOISE MONITORING AND VALIDATION RESULTS (L _{EQ} IN DBA)	14
TABLE 5:	BASELINE LONG-TERM NOISE MONITORING RESULTS (L _{DN} IN DBA).....	15
TABLE 6:	OBSERVED PEAK-HOUR TRAFFIC DATA ALONG BENNING ROAD FOR THE VALIDATION MODELING	15
TABLE 7:	PREDICTED PEAK-HOUR NOISE LEVELS – TRAFFIC ONLY.....	16
TABLE 8:	PREDICTED STREETCAR NOISE LEVELS AT SELECT SENSITIVE RECEIVERS - BUILD ALTERNATIVE 1 (dBA) .17	
TABLE 9:	NO. OF NOISE IMPACTS PREDICTED FOR STREETCAR OPERATIONS - BUILD ALTERNATIVE 1	18
TABLE 10:	PREDICTED STREETCAR NOISE LEVELS AT SENSITIVE RECEIVERS – PREFERRED ALTERNATIVE.....	20
TABLE 11:	NO. OF NOISE IMPACTS PREDICTED FOR STREETCAR OPERATIONS – PREFERRED ALTERNATIVE.....	21
TABLE 12:	GROUND-BORNE RMS VIBRATION IMPACT CRITERIA FOR ANNOYANCE DURING OPERATIONS AND CONSTRUCTION (VDB)	26
TABLE 13:	PREDICTED STREETCAR VIBRATION LEVELS AT SELECT RECEPTORS - BUILD ALTERNATIVE 1 (VDB)	29

TABLE 14: NO. VIBRATION IMPACTS PREDICTED FOR STREETCAR OPERATIONS - BUILD ALTERNATIVE 1.....29

TABLE 15: PREDICTED STREETCAR VIBRATION LEVELS AT SELECT RECEPTORS - PREFERRED ALTERNATIVE (VDB).. 30

Table 16: No. of Vibration Impacts Predicted for Streetcar Operations - Preferred Alternative 30

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Acronyms

BMP	Best Management Practices
CLRP	Constrained Long Range Plan
dB	decibels, linear or unweighted
dBA	A-weighted decibels
DDOT	District Department of Transportation
EA	Environmental Assessment
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
ips	inches per second
L _{dn}	Average Day-Night Noise Level
L _{eq}	Average Hourly Equivalent Noise Level
L _{max}	Maximum Noise Levels
μips	micro inches per second
mph	miles per hour
NEPA	National Environmental Policy Act
OCS	Overhead Contact System
RMS	Root Mean Squared
ROW	Right of Way
SEL	Sound Exposure Level
TIP	Transportation Improvement Program
TNM	Traffic Noise Model
TPSS	Traction Power Substation
VdB	Vibration velocity levels in Decibels
VHT	Vehicle Hours Traveled
VMT	Vehicle Miles Traveled

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1.0 Introduction

1.1 Proposed Action Overview

The Federal Highway Administration (FHWA), in coordination with the District Department of Transportation (DDOT), prepared this Environmental Assessment (EA) for the proposed Benning Road and Bridges Transportation Improvements project (the proposed action) in northeast Washington, DC. The proposed action would provide safety improvements, extend H/Benning Streetcar service, and enhance the roadway, pedestrian, and bicycle facilities to accommodate each mode along Benning Road between Oklahoma Avenue and the Benning Road Metrorail Station. FHWA is the lead federal agency for the EA, with DDOT (the Applicant) as the local sponsor. The agencies are preparing an Environmental Assessment (EA) for the proposed action in accordance with the National Environmental Policy Act (NEPA) as well as other federal and local laws.

The portion of Benning Road that is the subject of this EA is within the northeast section of Washington, DC and is approximately two miles long (roadways referenced within this EA are in the northeast quadrant of the District unless otherwise specified). The western terminus for the proposed action is the intersection of Benning Road and Oklahoma Avenue, and the eastern terminus is the Benning Road Metrorail Station. A study area was defined for the EA as the geographic area within a quarter-mile of Benning Road between and around these termini. The project study area is shown in **Figure 1**.

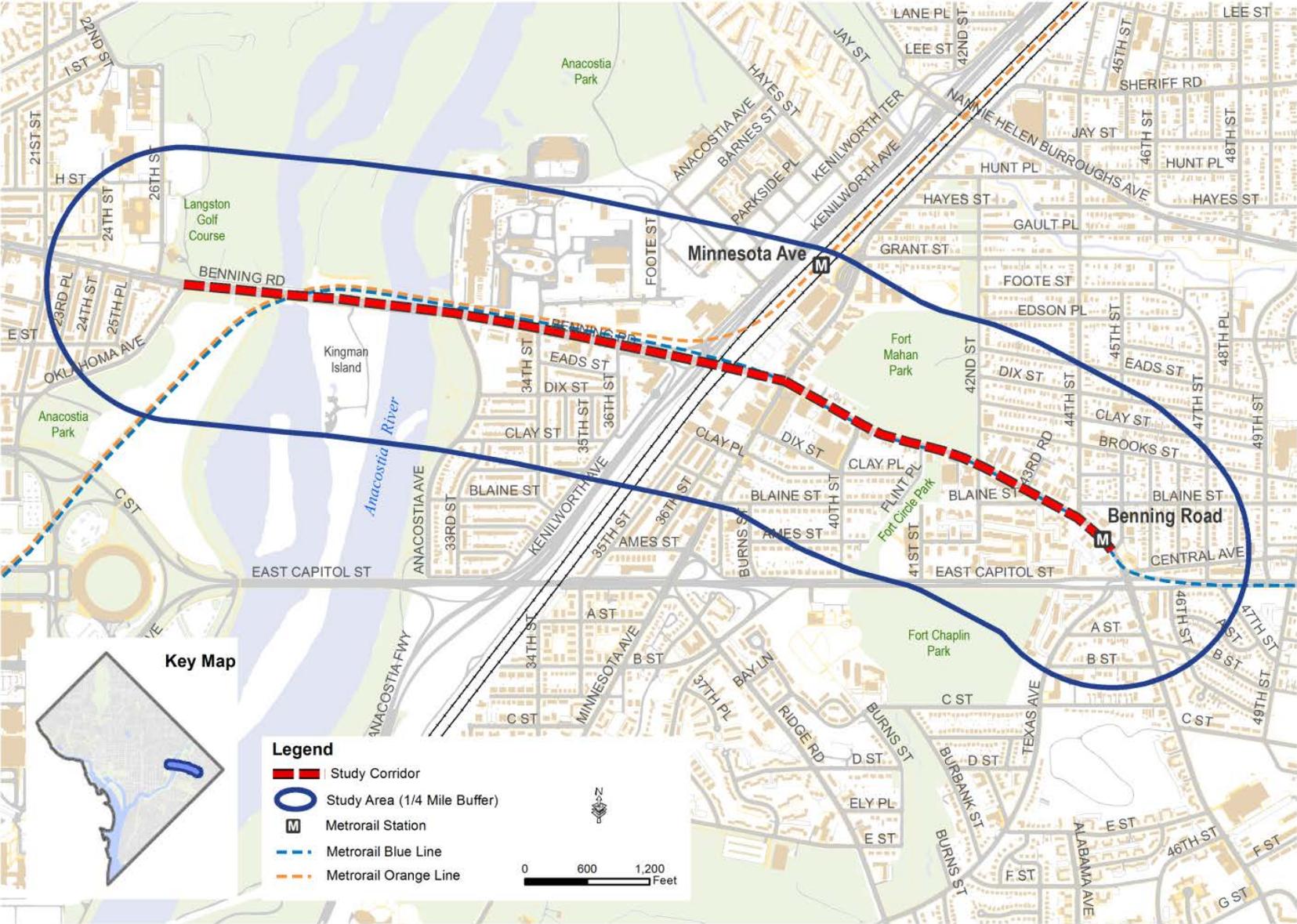
The western terminus for the project is the intersection of Benning Road and Oklahoma Avenue. This intersection is also the eastern terminus of one of the District's initial streetcar lines, the H/Benning Streetcar Line. The eastern terminus for the project is the Benning Road Metrorail Station. The proposed action would be predominantly within existing DDOT right-of-way along Benning Road. The proposed action is included in the adopted National Capitol Region Transportation Planning Board's Transportation Improvement Program (TIP) and the Constrained Long-Range Plan (CLRP).

The purpose of the proposed action is to address deficiencies in transportation infrastructure conditions, improve safety conditions and operations for both motorized and non-motorized access, and to provide for increased mobility and accessibility by improving transit operations and options between the intersection of Benning Road and Oklahoma Avenue and the Benning Road Metrorail Station.

1.2 Purpose of Report

The purpose of this technical report is to document potential impacts of operation and construction of the Benning Road and Bridges Transportation Improvements project (the proposed action) related to noise and vibration, and to describe mitigation measures, as warranted. The technical report supports and is part of the EA for the proposed action.

Figure 1: Proposed Action Study Area



1.1 Regulatory Setting

The Federal Noise Control Act of 1972 (Public Law 92-574) requires that all federal agencies administer their programs in a manner that promotes an environment free from noises that could jeopardize public health or welfare. The operational impacts from the new streetcars were evaluated using the guidelines set forth by FTA's guidance manual on *Transit Noise and Vibration Impact Assessment* (May 2006). Additionally, traffic impacts were evaluated using the guidelines set forth by the Federal Highway Administration's (FHWA) guidance *FHWA's Highway Traffic Noise: Analysis and Abatement Guidance* (December 2011).

1.2 Selection DDOT'S Preferred Alternative

The Draft EA was released for a 30-day public comment period on May 4, 2016 and a public hearing was held on May 19, 2016. The public and agencies were given the opportunity to review and comment on the EA until June 2, 2016. Public and agency coordination efforts have continued since the Draft EA and public hearing. DDOT held an Open House for the EA on November 15, 2017. After thorough consideration of input received from the public and agencies after publication of the Draft EA and based on technical analyses and the evaluation of alternatives, DDOT has selected Build Alternative 2-Median Streetcar Alignment with wired propulsion as the Preferred Alternative.

2.0 Operational Noise Analysis

The noise assessment of the proposed streetcar service was prepared to comply with National Environmental Policy Act (NEPA) requirements (23 CFR 772) and the guidelines set forth by the Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment* (May 2006).

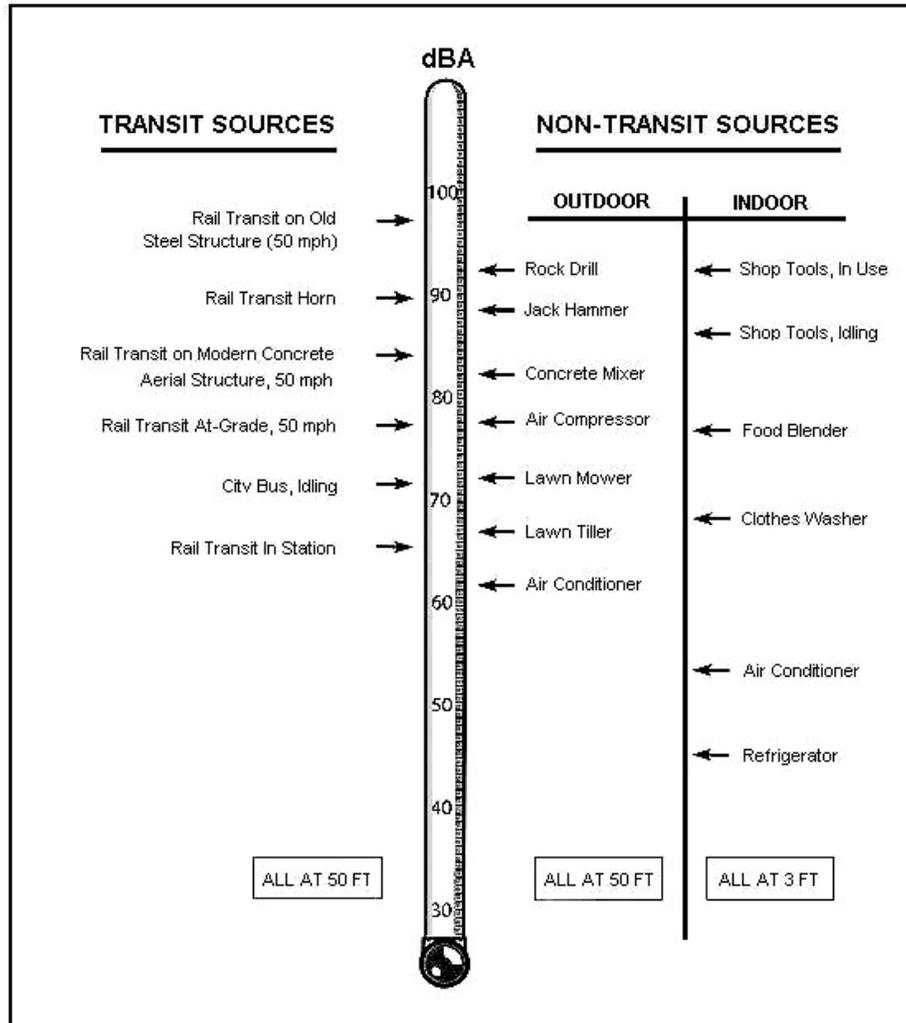
2.1 Descriptors and Fundamentals

Noise is "unwanted sound" and, by this definition, the perception of noise is a subjective process. Several factors affect the actual level and quality of sound (or noise) as perceived by the human ear and can generally be described in terms of loudness, pitch (or frequency), and time variation. The loudness, or magnitude, of noise determines its intensity and is measured in decibels (dB) that can range from below 40 dB (e.g., the rustling of leaves) to over 100 dB (e.g., a rock concert). Pitch describes the character and frequency content of noise, such as the very low "rumbling" noise of stereo subwoofers or the very high-pitched noise of a piercing whistle. Finally, the time variation of noise sources can be characterized as continuous, such as with a building ventilation fan; intermittent, such as for trains passing by; or impulsive, such as pile-driving activities during construction.

Various sound levels are used to quantify noise from transit sources, including a sound's loudness, duration, and tonal character. For example, the A-weighted decibel (dBA) is commonly used to describe the overall noise level because it more closely matches the human ear's response to audible frequencies. Since the A-weighted decibel scale is logarithmic, a 10 dBA increase in a noise level is

generally perceived as a doubling of loudness, while a three dBA increase in a noise level is just barely perceptible to the human ear. Typical A-weighted sound levels from transportation and other common sources are documented in FTA’s guidance manual on Transit Noise and Vibration Impact Assessment (May 2006) and are shown in Figure 2.

Figure 2: Typical A-Weighted Noise Levels



Source: FTA, Transit Noise and Vibration Impact Assessment (May 2006).

Several A-weighted noise descriptors are used to determine impacts from stationary and transportation-related sources, including:

- **Maximum Noise Levels (L_{max}):** represents the maximum noise level that occurs during an event such as a bus or train pass-by;
- **Average Hourly Equivalent Noise Level (L_{eq}):** represents a level of constant noise with the same acoustical energy as the fluctuating noise levels observed during a given interval, such as one hour ($L_{eq}(h)$); and
- **Average 24-hour day-night noise level (L_{dn}):** includes a 10-decibel penalty for all nighttime activity between 10:00 p.m. and 7:00 a.m.

2.2 Evaluation Criteria

For highway/transit projects, when both highway and transit cause noise, but at different times of the day, FTA's guidance manual specifies that noise impact from a project be determined using both FTA and FHWA methods. Therefore, noise impacts were evaluated for the proposed action from both traffic and streetcar operations. Streetcar impacts were evaluated using FTA's guidance manual, *Transit Noise and Vibration Impact Assessment* and the traffic impacts were evaluated using the DDOT *Noise Policy*.

The primary difference between FTA and FHWA noise assessment methods is that the FHWA procedure assesses only the loudest-hour noise levels, whereas the FTA procedure assesses the average 24-hour noise levels with a penalty of 10 decibels added to the nighttime hours. For most of the land uses located along Benning Road in the study area, traffic noise dominates during most of the daytime hours, including peak commute hours. Under the proposed action, streetcar noise would dominate the rest of the time including the nighttime hours. Therefore, an FHWA noise analysis has been performed for the proposed action in addition to the FTA noise analysis. Criteria for each agency are described in detail in the following subsections.

2.2.1 FTA Operational Noise Impact Criteria

FTA's guidance manual, *Transit Noise and Vibration Impact Assessment* (May 2006), presents the basic concepts, methods, and procedures for evaluating the extent and severity of noise impacts from transit projects. Transit noise impacts are assessed based on land use categories and sensitivity to noise from transit sources under FTA guidelines. As shown in **Figure 3**, FTA's noise impact criteria are defined by two curves that allow increasing project noise levels as existing noise increases up to a point, beyond which impact is determined based on project noise alone. FTA's land use categories and required noise metrics are shown in **Table 1**.

FTA's noise criteria are delineated into two categories: *moderate* and *severe* impacts. The *moderate* impact threshold defines areas where the change in noise is noticeable but may not be enough to cause a strong, adverse community reaction. The *severe* impact threshold defines the noise limits above which a substantial percentage of the population would be highly annoyed by new noise. The level of impact at any specific site can be established by comparing the predicted future proposed action noise level to the existing noise level at the site.

As shown in **Table 1**, the average day-night noise level over a 24-hour period (or L_{dn}) is used to characterize noise exposure for residential areas (FTA Land Use Category 2). The L_{dn} descriptor describes a receiver's cumulative noise exposure from all events over a full 24 hours, with events between 10:00 p.m. and 7:00 a.m. increased by 10 decibels to account for greater nighttime sensitivity to noise. For other noise sensitive land uses, such as schools and libraries (FTA Land Use Category 3) and outdoor amphitheaters (FTA Land Use Category 1), the average hourly equivalent noise level (or $L_{eq}(h)$) is used to represent the facility's peak operating period.

Figure 3: FTA Operational Noise Impact Criteria

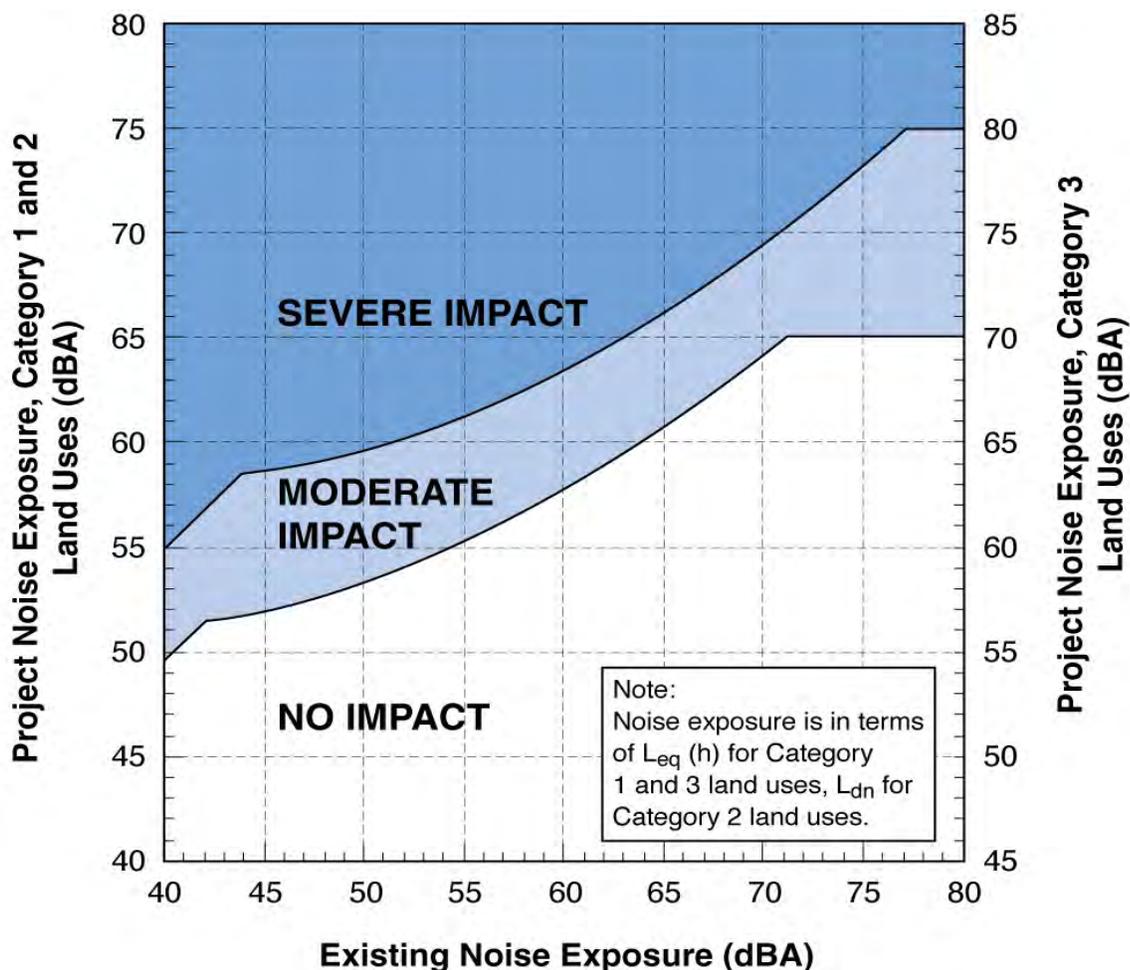


Table 1: FTA Land Use Categories and Noise Metrics

Land Use Category	Noise Metric	Description
1	$L_{eq}(h)$	Tracts of land set aside for serenity and quiet, such as outdoor amphitheaters, concert pavilions, and historic landmarks.
2	L_{dn}	Buildings used for sleeping such as residences, hospitals, hotels, and other areas where nighttime sensitivity to noise is of utmost importance.
3	$L_{eq}(h)$	Institutional land uses with primarily daytime and evening uses including schools, libraries, churches, museums, cemeteries, historic sites, and parks, and certain recreational facilities used for study or meditation.

Source: Transit Noise and Vibration Impact Assessment, FTA, Washington, DC, May 2006.

2.2.2 FHWA Noise Abatement Criteria

The proposed action includes adjusting the travel lane configuration along Benning Road in the study area to accommodate roadway traffic, the proposed streetcar service, the proposed safety improvements and bicycle and pedestrian facility improvements. For these reasons, the proposed action would be classified as an FHWA Type 1 noise project. This classification means that a project would cause impacts if it increases existing noise levels by at least six decibels, or if the predicted traffic noise approaches or exceeds the operational noise abatement criteria (NAC). Any sensitive receiver that would experience one or both impacts is eligible for consideration of noise abatement. DDOT’s noise abatement criteria for highway projects are land use categories and are at least as stringent as those of FTA and FHWA; the criteria are summarized in **Table 2**. Each NAC for which there is an activity criterion is a sensitive receiver.

Table 2: DDOT Land Use Categories and Noise Metrics

Activity Category	Activity Criteria $L_{eq}(h)^1$	Evaluation Location	Activity Description
A	57	Exterior	Lands on which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purposes.
B ²	67	Exterior	Residential.
C ²	67	Exterior	Active sports areas, amphitheaters, auditoriums, campgrounds, cemeteries, day care centers, hospitals, libraries, medical facilities, parks, picnic areas, places of worship, playgrounds, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, recreation areas, Section 4(f) sites, schools, television studios, trails, and trail crossings.
D	52	Interior	Auditoriums, day care centers, hospitals, libraries, medical facilities, places of worship, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, schools, and television studios.
E ²	72	Exterior	Hotels; motels; offices; restaurants/bars; and other developed lands, properties, or activities not included in A-D or F.
F	--	--	Agriculture, airports, bus yards, emergency services, industrial, logging, maintenance facilities, manufacturing, mining, rail yards, retail facilities, shipyards, utilities (water resources, water treatment, electrical), and warehousing.
G	--	--	Undeveloped lands that are not permitted.

Source: Noise Policy, DDOT, Washington, DC, January 10, 2011.

1. The $L_{eq}(h)$ Activity Criteria values are for impact determination only and are not design standards for noise abatement measures.
2. Includes undeveloped lands permitted for this activity category.

Consistent with DDOT policy, noise abatement would be considered for land use categories B and C if exterior noise due to a project that causes traffic noise to be 66 dBA or higher. For Category E land uses, noise abatement would be considered if the predicted exterior noise is 71 dBA or higher. Only the external land use categories B, C and E have been evaluated for the proposed action. For these land use categories, the operational noise impact criteria are applicable only when there are areas of frequent

outdoor human activity at the receivers. For the proposed action, interior land uses have not been evaluated for noise impacts.

The procedures used for assessing traffic noise impacts from the proposed action are based on the FHWA procedures and include the following general steps:

- Identify sensitive receivers and their land use category in the study area. Determine the sensitive land uses that have exterior areas where frequent human use occurs and are exposed to the project noise sources.
- Measure the existing noise at representative sensitive receivers in the study area to determine the conditions at each noise-sensitive receiver.
- Develop a model to predict traffic noise levels.
- Where there is noise impact, consider noise abatement.
- Evaluate the reasonableness and feasibility of the noise abatement.

2.3 Assessment Methodology

Noise impacts from both traffic and streetcar operations were analyzed using DDOT's *Noise Policy* and FTA's "Detailed Assessment" guidelines; the policy and guidance enable the analysis to apply input data that reflects study area conditions. Traffic and transit sources of noise were evaluated separately using the operational abatement criteria from each agency. The cumulative effects from traffic and transit during the peak periods were also evaluated using the FHWA's operational NAC.

In general, when exceedances of the operational noise impact criteria are predicted, mitigation is then identified and evaluated qualitatively to determine whether the mitigation is feasible (provides adequate noise reduction benefits) and reasonable (mitigation is cost-effective).

2.3.1 Consistency with Previous Study

Since the proposed action would extend streetcar transit service east of downtown Washington along the envisioned Benning Road rail corridor that was previously studied, noise from the build alternatives was evaluated using the modeling assumptions from the previous study (*Noise and Vibration Technical Report for H Street/Benning Road Streetcar Project*, April 2013).

2.3.2 Existing Conditions Analysis Procedure

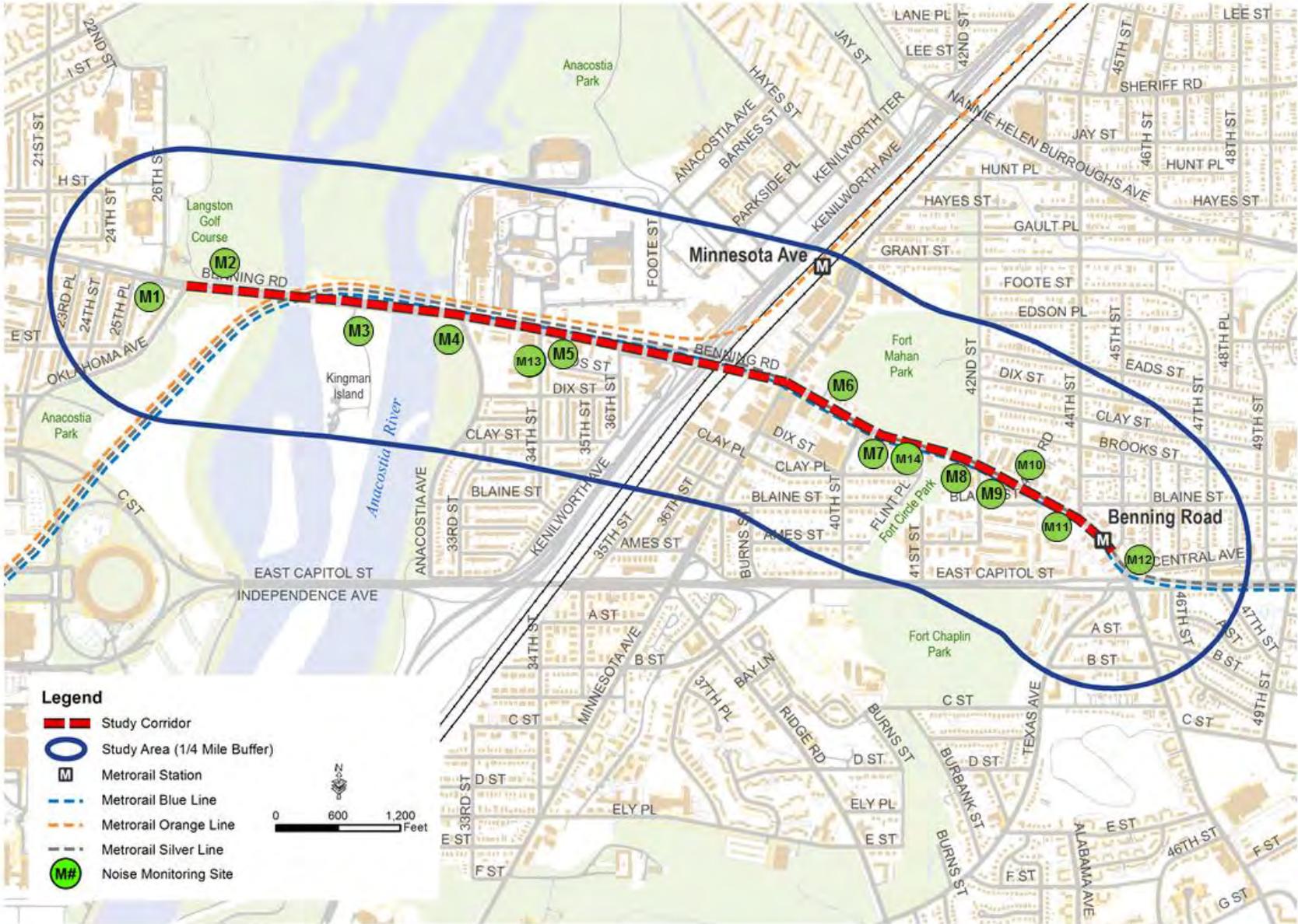
To determine the existing background noise levels at sensitive receiver near Benning Road, a noise-monitoring program was conducted at 14 representative locations shown in **Figure 4**. The sound-level meters that were used to measure noise conditions (Brüel & Kjær Model 2236 and Larson Davis Model 820) meet or exceed the American National Standards Institute (ANSI) standards for Type I accuracy and quality. The sound-level meters were calibrated using a Brüel & Kjær Model 4231 before and after each measurement. All measurements were conducted according to *ANSI Standard S1.13-2005, Measurement of Sound Pressure Levels in Air* (March 5, 2010). All noise levels are reported in dBA, which best approximates the sensitivity of human hearing.

Short-term noise measurements were obtained at Sites M1 to M12 from July 18 to July 20, 2017 during peak noise hours of the day. The selected measurement sites are representative of larger clusters of residences with similar noise exposures. Additionally, long-term 24-hour noise levels were measured at Sites M13 and M14 from April 9 to April 10, 2014 during various periods of the day in accordance with FTA's guidelines to determine the average noise conditions on a typical weekday. The long-term noise measurements were used to develop the impact criteria used to assess streetcar noise impacts in FTA's procedure.

The noise measurements documented existing noise sources along the study area, including traffic along Benning Road, DC- 295, other major cross streets and Metrorail Orange, Silver and Blue Line train operations. The 24-hour day-night noise level (or L_{dn}) is used to describe existing noise at residences and other FTA Category 2 land uses. Similarly, peak-hour equivalent noise levels (L_{eq}) are reported for non-residential or institutional receivers such as schools, libraries, or churches. The L_{eq} is also used to describe existing noise as part of the FHWA assessment. All noise levels are reported in A-weighted noise levels (or dBA).

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Figure 4: Noise Monitoring Locations



2.3.3 Operational Noise Modeling Assumptions

To predict noise impacts under the No-Build Alternative and Build Alternatives 1 and 2, noise modeling was performed using a prediction model specifically developed by the FHWA for this purpose. The various noise modeling assumptions, noise levels for each of the proposed noise sources (including traffic, train pass-bys, warning bells, etc.), and other operating characteristics (such as average dwell times, source heights, etc.) are described below. These data are based on default FTA data, as well as information included in the *Benning Road Operations Plan Report* (2014).

Traffic noise modeling used peak-hour traffic data for the 2014 Existing Condition and the future 2040 No-Build and build alternatives derived from the traffic report for the proposed action titled *Transportation Technical Memorandum*, December 2014.

Noise modeling assumptions for this analysis included the following:

- Total daily streetcar operations were determined based on 10-minute headways for all periods of the day (between 5:00 a.m. and 12:00 a.m.), including both peak and off-peak periods, daytime and nighttime. This service frequency was used to predict future noise levels under the build alternatives.
- A one-vehicle streetcar train was assumed for all periods of the day and night including peak and off-peak periods. The project-specific source noise level of 79 dBA sound exposure level (SEL) (75 dBA L_{max}) was assumed for all streetcar pass-bys (50 feet and 25 mph). The proposed action is consistent with what was done previously by using the same reference noise and vibration level (*Noise and Vibration Technical Report for H Street/Benning Road Streetcar Project*, April 2013).
- The streetcar reference noise was adjusted for receiver distances only as the reference levels already account for the speed of 25 miles per hour (mph) and embedded track. For a conservative or worst-case estimate, no adjustments were applied for ground attenuation effects (i.e., assume acoustically hard ground).
- At each of the designated stops, an FTA default source noise level of 70 dBA L_{max} was assumed for all streetcar events, with an average time of 30 seconds for a streetcar to pick up or discharge passengers at stops to account for the noise contribution from stationary or auxiliary vehicle noise (such as rooftop mechanical equipment).
- Although train operating speeds would vary by location depending on traffic congestion, a speed of 25 mph was applied to the study corridor to be consistent with the previous study's analysis assumptions.
- Since the streetcar is proposed for operations in mostly mixed-traffic, dedicated signal phases are proposed at some intersections where the rail vehicles must cross active roadways. As a result of the proposed protected streetcar signal phases at intersections, on-board warning devices or bells would only be sounded as part of DDOT's standard operating procedures. Similarly, streetcar warning bells would also be sounded upon arriving at and departing from stops.
- On-board warning horns would only be used during emergency situations and were not considered as part of this analysis because they would not occur as part of standard operating procedures.

- Several track switches were identified along the proposed action alignment particularly at the DC Streetcar Car Barn Training Center as well as at junctions and crossovers at the tail ends of the proposed action alignment. As a result, potential impacts due to track switches and other special track work were also evaluated as part of this analysis. Streetcar noise levels were adjusted by six dBA to account for all proposed crossovers and frogs.
- Streetcars are designed to operate in tight urban environments without wheel squeal along tight-radius curves. To be consistent with the previous study, wheel squeal could occur at curves with a radius less than 400 feet. Therefore, an adjustment of 10 dBA was applied to the streetcar noise levels to account for wheel squeal at the western-most end of the corridor at Station Numbers 10+00 and 12+00 along the DC Streetcar Car Barn Training Center track. Wheel squeal impacts at the 26th Street curve leading to the Car Barn were evaluated based on streetcar operations equal to 10 percent of the total daily operations. This value is a reasonable estimate to reflect the limited level of activity accessing or egressing the DC Streetcar Car Barn Training Center.
- Although traction power substations (TPSS) may be utilized along the proposed action alignment as indicated in the original *Noise and Vibration Technical Report for H Street/Benning Road Streetcar Project*, April 2013, the noise impact from these units would comply with the DDOT limit of 50 dBA at 50 feet. As a result, noise from TPSS was not evaluated as part of this assessment because there is no potential for impact given the high ambient background measured in the study area.
- Noise from existing buses at proposed streetcar stops was included as part of the baseline noise monitoring (i.e., existing conditions). Therefore, existing bus noise was not included as a separate and additional source of noise as part of the proposed action because they currently operate along the study area and would continue to do so with only minor modifications. As a result, no new noise is proposed as a result of existing bus operations.
- Impacts due to the construction and operation of the existing DC Streetcar Car Barn Training Center were evaluated as part of H/Benning streetcar study. However, the new track turnout switches along 26th Street for streetcars accessing the maintenance facility from Benning Road were included in this analysis.
- Vehicular traffic along Benning Road would follow different patterns under the build alternatives when the streetcars are operational. To account for streetcar pass-bys, vehicular traffic was allocated as follows along the new two-lane roadway configuration:
 - 48 percent – traffic lane with tracks (i.e., lane that shares streetcar operations)
 - 52 percent – traffic lane exclusive to motor vehicles only (i.e., without streetcar tracks)
- The vehicular traffic used for the FHWA modeling analysis is summarized in **Table 3**.
- The vehicle mix (such as passenger cars, medium trucks, and heavy trucks) used to determine the traffic noise is also shown in **Table 3**.
- A traffic speed of 35 mph was applied as a conservative estimate along all sections of Benning Road on the study area.

A total of 197 noise sensitive receiver sites were identified within the study area and used in the noise modeling.

Table 3: Peak-Hour Traffic Volumes and Vehicle Mix Data

Alternative	Direction	Lane	21 st Street - Anacostia Avenue	Anacostia Avenue - 295 Ramps	295 Ramps - Minnesota Avenue	Minnesota Avenue - 43 rd St	43 rd Street - E. Capitol Street
2014 Existing Condition	Westbound	With Track	1,195	1,272	955	557	576
		No Track	1,295	1,378	1,035	603	624
	Eastbound	With Track	418	470	389	235	216
		No Track	452	510	421	255	234
2040 No-Build Alternative & Build Alternatives	Westbound	With Track	1,373	1,459	1,099	634	662
		No Track	1,487	1,581	1,191	686	718
	Eastbound	With Track	480	542	446	269	250
		No Track	520	588	484	291	270
Vehicle Mix	All directions	CARS	86%	86%	93%	93%	93%
		MEDIUM TRUCKS	7%	7%	5%	5%	5%
		HEAVY TRUCKS	7%	7%	2%	2%	2%

Source: Benning Roads and Bridges Transportation Improvements, Transportation Technical Memorandum, December 2014.

Since the release of the Draft EA, the design year for the No-Build & Preferred Alternatives has been changed to 2045. The traffic conditions expected to exist during these periods are described in **Appendix E** of the Final EA. The traffic model of the 2045 condition shows increased travel demand throughout the study area network. Since neither of the alternatives assume any major increases in roadway capacity, it is reasonable to conclude that the increase in traffic demand would exacerbate existing patterns of traffic congestion expected to exist. Since roadway facilities are typically their noisiest when traffic is traveling at or near free flow speeds, this expansion of congestion will most likely cause noise levels to be lower in 2045 than they are in 2040. Based on this conclusion, DDOT determined that the current 2040 versions of the No-Build and Preferred Alternative traffic noise models still assess the worst traffic noise condition required by FHWA. As the project moves into design, DDOT will revisit this determination and prepare a supplemental noise analysis as required by FHWA’s noise analysis guidelines.

2.3.4 FHWA Noise Modeling Validation

To accurately validate the traffic noise model, traffic data were gathered concurrent with the short-term noise monitoring periods. Traffic speeds, number of vehicles, and vehicle mix percentages for nearby roads were recorded. Other significant localized factors affecting the recorded noise levels, such as non-traffic noise sources (aircraft flyovers, train horns, barking dogs, etc.) and intervening terrain, were also noted at each monitoring site.

The model validation process compares the actual measured noise levels with the predicted noise levels under the same traffic conditions observed during the noise measurement period. If the predicted noise levels from the model are within three dBA of the measured levels, then the prediction model for the sensitive receiver sites is considered to provide accurate predictions of worst-case traffic noise impacts. As shown in **Table 4**, calculated L_{eq} noise levels for the noise monitoring period compare very well with the actual measured noise levels (i.e., the predicted levels are within three dBA of the measured noise levels). As a result, the FHWA traffic noise model developed for the study area was validated for use in predicting future levels under the No-Build and build alternatives.

2.4 Affected Environment – Operational Noise

Land uses adjacent to Benning Road are an urban mix of low-medium density residential, commercial, and public uses including several parks as described in more detail in **Chapter 3** of the EA for the proposed action. Although some residential properties have small front yards, buildings are close to the existing roadway. As summarized below in **Table 4**, peak-hour noise levels measured at sensitive receiver sites in the study area range from 63 dBA at Site M12 (residence at 26 46th Street) to 74 dBA at Site M1 (residence at 2531 Benning Road). All peak-hour noise levels are representative of active downtown urban land uses.

Table 4: Baseline Short-term Noise Monitoring and Validation Results (L_{eq} in dBA)

ID ¹	Receptor Description	Measure	Model	Difference	Validated
M1	2531 Benning Road	74	74	0	Yes
M2	Langston Golf Course Historic District	73	72	-1	Yes
M3	Kingman And Heritage Islands Park	71	69	-2	Yes
M4	3341 Benning Road	68	67	-1	Yes
M5	505 34 th Street	70	68	-2	Yes
M6	3940 Benning Road	71	69	-2	Yes
M7	4043 Benning Road	70	69	-1	Yes
M8	4103 Benning Road	69	67	-2	Yes
M9	4201 Benning Road	71	69	-2	Yes
M10	4242 Benning Road	71	70	-1	Yes
M11	4365 Benning Road	65	67	2	Yes
M12	26 46 th Street	63	65	2	Yes

¹See Figure 5 for noise monitoring locations.

Additionally, long-term noise levels in the study area were also measured at two representative locations. As shown in **Table 5**, long-term day-night noise levels (or L_{dn}) range from 64-65 dBA in the vicinity of Receptor M13 (residences adjacent to the River Terrace Elementary School along 34th Street) to 65-73 dBA at Receptor M14 (residences along Benning Road opposite Fort Mahan). In general, the measured noise levels are representative of heavy traffic along downtown urban streets. The traffic volumes observed during the noise monitoring program and used in the validation exercise are summarized in **Table 6**. The average observed travel speeds along Benning Road in the study area ranged from 35 to 40 mph.

Table 5. Baseline Long-term Noise Monitoring Results (L_{dn} in dBA)

ID	Receptor Description	Measure
M13	Residences near River Terrace Elementary School, 34 th Street	64 - 65
M14	Residences, Benning Road at 41 st Street opposite Fort Mahan Park	65 - 73

Table 6. Observed Peak-Hour Traffic Data along Benning Road for the Validation Modeling

Receptor	Direction ¹	Auto	Medium Truck	Heavy Truck	Bus	Motorcycle
M1	EB	185	12	8	9	1
	WB	613	22	4	10	3
M2	EB	241	7	4	7	0
	WB	816	30	4	21	3
M3	EB	218	10	7	4	2
	WB	702	33	6	13	1
M4	EB	218	10	7	4	2
	WB	702	33	6	13	1
M5	EB	218	10	7	4	2
	WB	702	33	6	13	1
M6	EB	106	6	0	6	0
	WB	198	4	0	2	0
M7	EB	101	7	0	5	0
	WB	270	2	0	4	1
M8	EB	109	5	1	2	0
	WB	250	8	1	3	0
M9	EB	110	8	0	2	0
	WB	200	5	1	2	0
M10	EB	110	8	0	2	0
	WB	200	5	1	2	0
M11	EB	167	3	1	4	0
	WB	352	6	1	4	1
M12 (Benning)	EB	139	8	1	2	1
	WB	244	6	0	2	0
M12 (Capitol)	EB	112	4	1	3	2
	WB	565	6	2	2	0

¹Note: Traffic was observed in both the eastbound (EB) and westbound (WB) directions.

2.5 Environmental Consequences – Operational Noise

This section describes the results of operational noise analyses for the No-Build and build alternatives. By evaluating differences in noise levels between the 2040 No-Build Alternative and the build alternatives, the relative impact of the proposed action on noise levels can be better understood and considered in project planning.

The operational noise analyses examine Build Alternatives 1 and 2, including streetcar operations (travel on the tracks in Benning Road, vehicle stops to pick up or discharge passengers, and travel on the connecting track to the DC Streetcar Car Barn Training Center). Other streetcar infrastructure elements, including the traction powered substations and propulsion system (wired or wireless) would not be sources of noise and, therefore, are not analyzed. Noise from traffic on Benning Road is also analyzed.

2.5.1 No-Build Alternative

Worst-case conditions were calculated for the future (2040) No-Build Alternative. This scenario represents the future roadway facilities, incorporating no changes to the roadway geometry and no elements of the proposed action. The validated noise model was used as the baseline for the calculation of future No-Build worst-case noise levels. As shown in **Table 7**, calculated worst-case cumulative L_{eq} noise levels for the No-Build Alternative range from 66 dBA at Site M12 (a residence along 46th Street) to 75 dBA at Site M1 (a residence at 2531 Benning Road opposite the DC Streetcar Car Barn Training Center).

Table 7: Predicted Peak-Hour Noise Levels – Traffic Only

Name	Description	Cat.	NAC	2014 Existing	2040 No-Build	2040 Curbside	2040 Median
M1	2531 Benning Road	Residence	67 / B	74	75	75	75
M2	Langston Golf Course Historic District	Park	67 / C	70	70	70	70
M3	Kingman and Heritage Islands Park	Park	67 / C	67	68	68	68
M4	3341 Benning Road	Park	67 / C	69	69	70	70
M5	505 34 th Street	Residence	67 / B	69	70	70	70
M6	3940 Benning Road	Residence	67 / B	67	67	67	67
M7	4043 Benning Road	Residence	67 / B	68	68	68	68
M8	4103 Benning Road	Office	72 / E	67	67	67	67
M9	4201 Benning Road	Residence	67 / B	69	70	70	70
M10	4242 Benning Road	Office	72 / E	68	69	68	68

Name	Description	Cat.	NAC	2014 Existing	2040 No-Build	2040 Curbside	2040 Median
M11	4365 Benning Road	Residence	67 / B	68	69	69	69
M12	26 46 th Street	Residence	67 / B	66	66	66	66

As shown in **Table 7**, traffic noise is predicted to exceed the FHWA operational NAC at all residences and parks immediately adjacent to Benning Road in the No-Build Alternative. As no streetcar operations will occur in the No-Build Alternative, no exceedances of FTA’s operational impact criteria will occur.

2.5.2 Build Alternative 1

2.5.3 Streetcar Operations

The validated noise models were modified to incorporate the design elements of Build Alternative 1 to calculate the future (2040) loudest hour noise levels. The build alternative elements were used to identify the number and location of noise sensitive receivers. As shown in **Table 8**, noise levels from streetcar operations under the Build Alternative 1 are predicted to range from 49 dBA at Site M4 (Anacostia Park at 3341 Benning Road) to 69 dBA at Site M1 (a residence at 2531 Benning Road opposite the DC Streetcar Car Barn Training Center).

Table 8: Predicted Streetcar Noise Levels at Select Sensitive Receivers - Build Alternative 1 (dBA)

ID	Receptor Description	FTA Cat.	Noise		FTA Criteria			
			Existing	Build	Moderate	Severe	Impact	Metric
M1	2531 Benning Road	2	65	69	61	66	SEV	L _{dn}
M2	Langston Golf Course Historic District	3	67	52	67	73	NO	Leq
M3	Kingman and Heritage Islands Park	3	67	52	67	73	NO	Leq
M4	Anacostia Park	3	67	49	67	73	NO	Leq
M5	505 34 th Street	2	65	55	61	66	NO	L _{dn}
M6	3940 Benning Road	2	71	57	65	70	NO	L _{dn}
M7	4043 Benning Road	2	71	58	65	70	NO	L _{dn}
M8	4103 Benning Road	3	73	55	70	77	NO	Leq
M9	4201 Benning Road	2	71	59	65	70	NO	L _{dn}
M10	4242 Benning Road	3	73	54	70	77	NO	Leq
M11	4365 Benning Road	2	71	57	65	70	NO	L _{dn}
M12	26 46 th Street	2	71	60	65	70	NO	L _{dn}

The number of noise impacts due to streetcar operations in the study area is quantitated in **Table 9**. Specifically, exceedances of FTA’s severe impact criteria are predicted at four residences (or FTA Category 2 land uses) in the vicinity of the track switches at the curve for the DC Streetcar Car Barn Training Center. Additionally, exceedances of FTA’s moderate impact criteria are predicted at nine other residences under Build Alternative 1 (four at the DC Streetcar Car Barn

Training Center switches and five near the 42nd Street stop due to rail transit bell ringing). No exceedances of FTA’s noise impact criteria are predicted at any Category 1 or 3 land uses. The locations of predicted noise impacts for Build Alternative 1 are shown in **Figure 5**.

Table 9: No. of Noise Impacts Predicted for Streetcar Operations - Build Alternative 1

Metric	Noise Impacts		
Cat.	No Impact	<i>Moderate</i>	<i>Severe</i>
1	0	0	0
2	164	9	4
3	12	0	0

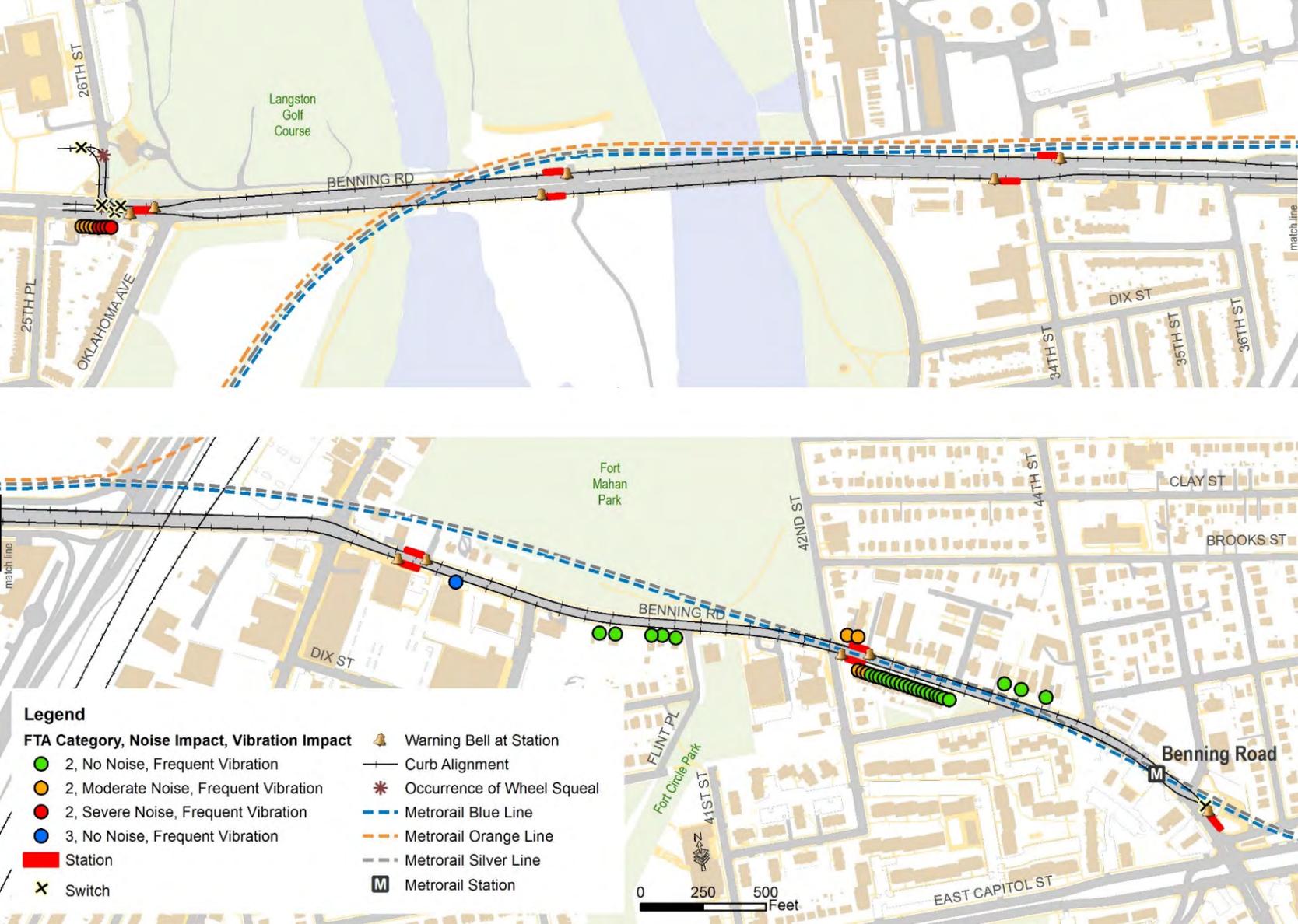
Streetcar operations under Build Alternative 1 in other locations along Benning Road, including bell ringing, are predicted to be well below existing noise levels due to the slow travel speeds.

2.5.4 Traffic Operations

Traffic noise impacts along Benning Road in Build Alternative 1 are predicted to be similar to the No-Build Alternative because the traffic volumes would be similar. As shown in **Table 7**, calculated worst-case cumulative L_{eq} noise levels for the Build Alternative 1 range from 66 dBA at Site M12 (a residence along 46th Street) to 75 dBA at Site M1 (a residence at 2531 Benning Road opposite the DC Streetcar Car Barn Training Center). As shown in **Table 7**, and like the No-Build Alternative and The Preferred Alternative, exceedances of the FHWA NAC are predicted at all residences and parks adjacent to Benning Road. Compared to the noise from future streetcar operations, the future traffic along Benning Road would account for up to 98 percent of the total noise in the Benning Road corridor. As a result, the cumulative noise levels that combine both the streetcar operations and the future traffic under the Build Alternative 1 are approximately the same as the peak-hour noise levels shown in **Table 7**, and the same as the No-Build Alternative.

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Figure 5: Build Alternative 1 Noise and Vibration Modeling Results



2.5.5 Preferred Alternative

2.5.6 Streetcar Operations

The validated noise models were modified to incorporate the design elements of the Preferred Alternative to calculate the future (2040) loudest hour noise levels. The build alternative elements were used to identify the number and location of noise sensitive receivers. As shown in **Table 10**, noise levels from streetcar operations under the Preferred Alternative are predicted to range from 49 dBA at Site M4 (Anacostia Park at 3341 Benning Road) to 69 dBA at Site M1 (a residence at 2531 Benning Road opposite the DC Streetcar Car Barn Training Center).

As noted in Section 2.3.3, since the release of the Draft EA, the design year for the Preferred Alternative was reset to be 2045. Based on the results of the 2045 traffic simulations, however, DDOT determined that the 2040 noise models should still be used to identify the loudest hour noise levels. This decision is based on the observation that the growth of travel demand between 2040 and 2045 (and the absence of any roadway capacity improvements) would result in general increase in congestion and lowering of traffic noise.

Table 10: Predicted Streetcar Noise Levels at Sensitive Receivers – Preferred Alternative

ID	Receptor Description	FTA Cat.	Noise		FTA Criteria			
			Existing	Build	Moderate	Severe	Impact	Metric
M1	2531 Benning Road	2	65	69	61	66	SEV	L _{dn}
M2	Langston Golf Course Historic District	3	67	52	67	73	NO	L _{eq}
M3	Kingman and Heritage Islands Park	3	67	52	67	73	NO	L _{eq}
M4	Anacostia Park	3	67	49	67	73	NO	L _{eq}
M5	505 34 th Street	2	65	55	61	66	NO	L _{dn}
M6	3940 Benning Road	2	71	57	65	70	NO	L _{dn}
M7	4043 Benning Road	2	71	58	65	70	NO	L _{dn}
M8	4103 Benning Road	3	73	55	70	77	NO	L _{eq}
M9	4201 Benning Road	2	71	59	65	70	NO	L _{dn}
M10	4242 Benning Road	3	73	54	70	77	NO	L _{eq}
M11	4365 Benning Road	2	71	57	65	70	NO	L _{dn}
M12	26 46 th Street	2	71	60	65	70	NO	L _{dn}

The number of noise impacts due to streetcar operations in the study area is quantitated in **Table 11**. Specifically, exceedances of FTA’s severe impact criteria are predicted at four residences (or FTA Category 2 land uses) in the vicinity of the track switches at the curve for the DC Streetcar Car Barn Training Center. Additionally, exceedances of FTA’s moderate impact criteria are predicted at five other residences under the Preferred Alternative (four at the DC Streetcar Car Barn Training Center switches and one near the 42nd Street stop due to rail transit bell ringing). No

exceedances of FTA’s noise impact criteria are predicted at any Category 1 or 3 land uses. The locations of predicted noise impacts for The Preferred Alternative are shown in **Figure 6**.

Table 11: No. of Noise Impacts Predicted for Streetcar Operations – Preferred Alternative

Metric	Noise Impacts		
Cat.	No Impact	<i>Moderate</i>	<i>Severe</i>
1	0	0	0
2	168	5	4
3	12	0	0

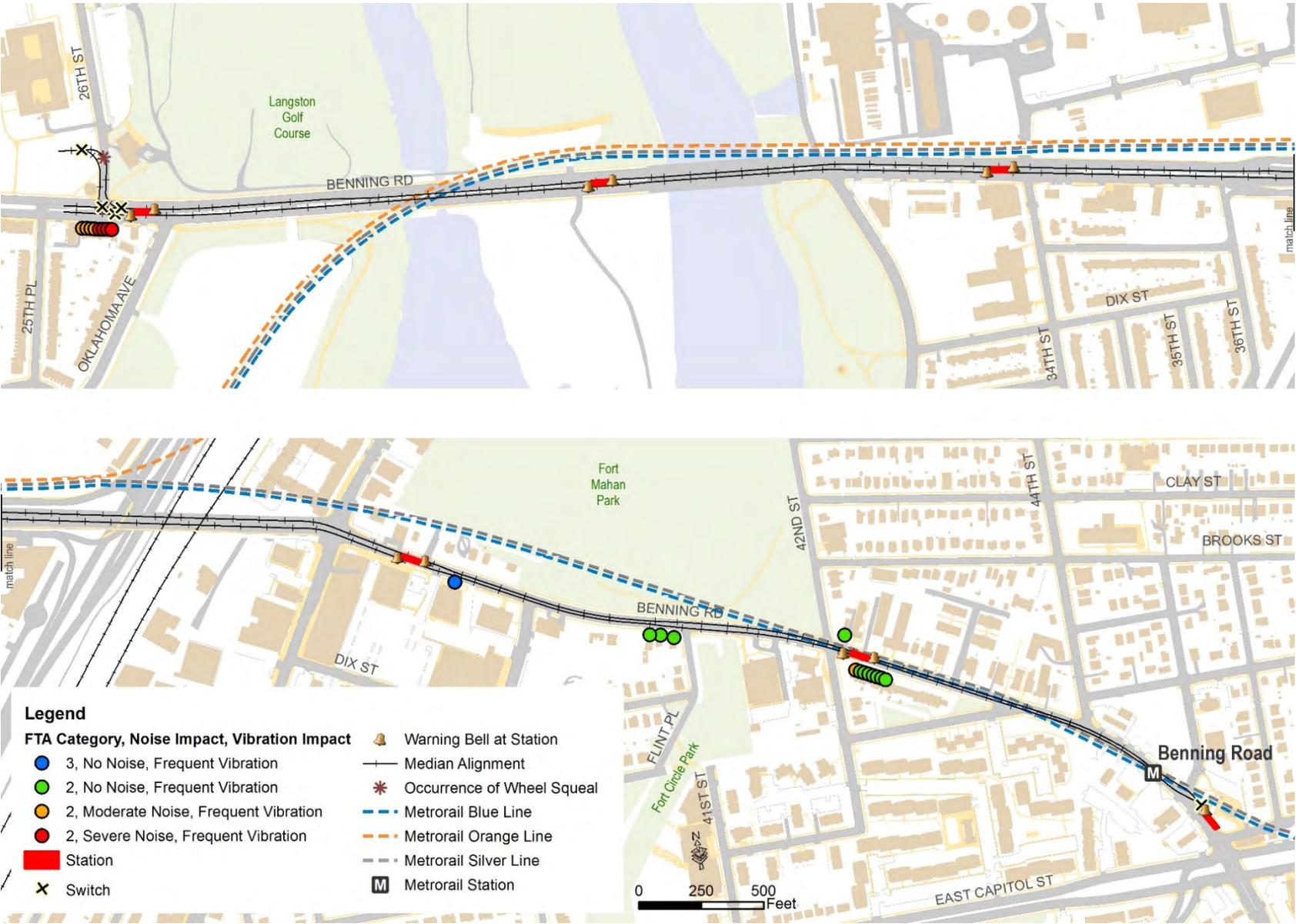
Noise levels from streetcar operations under the Preferred Alternative are predicted to be lower than those of Build Alternative 1 because the median alignment would be farther from adjacent properties.

2.5.7 Traffic Operations

Traffic noise impacts along Benning Road under The Preferred Alternative are predicted to be similar to the No-Build Alternative because the traffic volumes would be similar. As shown in **Table 7**, calculated worst-case cumulative L_{eq} noise levels for the Preferred Alternative range from 66 dBA at Site M12 (a residence along 46th Street) to 75 dBA at Site M1 (a residence at 2531 Benning Road opposite the DC Streetcar Car Barn Training Center). As shown in **Table 7**, and like the No-Build Alternative and Build Alternative 1, exceedances of the FHWA NAC are predicted at all residences and parks adjacent to Benning Road. Compared to the noise from future streetcar operations, the future traffic along Benning Road would account for up to 98 percent of the total noise in the Benning Road corridor. As a result, the cumulative noise levels that combine both the streetcar operations and the future traffic under the Preferred Alternative are approximately the same as the peak-hour noise levels shown in **Table 7**, and the same as the No-Build Alternative.

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Figure 6: Preferred Alternative Noise and Vibration Modeling Results



2.5.8 Operational Noise Impact Mitigation

DDOT will undertake mitigation measures to reduce or eliminate impacts for the Preferred Alternative. These measures will be undertaken during project design and will include the following typical activities:

- Eliminate or reduce the severity of noise impacts on the residences by shifting the 42nd Street stop to the west side of the intersection Benning Road and 42nd Street;
- Eliminate or reduce the severity of noise impacts due to track switches by installing “spring frogs,” pointless switches or other controls (such as a “well-designed flange-bearing frog” as recommended in the Noise and Vibration Technical Report for H St/Benning Rd Streetcar Project, April 2013), or a flange-lifter. These fixtures eliminate the gap in the rail and thereby the impulsive or impact noise from the steel wheel striking the rail gap. These control measures would reduce noise levels due to this source approximately 6 dBA;
- Eliminate or reduce the severity of noise impacts due to wheel squeal by increasing the radius of the track curves, applying flange lubricators to “grease” the contact points between the steel wheels and the steel rail heads, or procuring streetcar vehicles that can operate effectively along tracks with radii less than 100 feet without causing wheel squeal to occur. These control measures would reduce noise levels due to this source approximately 10 dBA;
- Eliminate or reduce in severity the noise impacts of rail transit bell ringing as safety protocols allow. Alternative measures where source controls are not practical or feasible include wayside treatments such as residential sound insulation, including acoustical windows and doors. These control measures would reduce noise levels due to this source approximately 7-10 dBA.”;
- Additional evaluations to verify the predicted impacts; and
- Post project implementation, streetcar operational noise levels will be recomputed and reassessed to account for and confirm the above mitigation.

Noise impacts would be due to traffic along Benning Road, not the build alternatives, and cannot be mitigated in a “feasible and reasonable” manner in accordance with the DDOT Noise Policy. Due to the number of driveways along Benning Road used to access residences, offices, parks and other properties, noise barriers are not a viable option. Openings in noise barriers degrade the acoustical performance, thereby significantly limiting the benefits they have the potential to provide. Other abatement measures (such as limiting truck traffic, reduced speeds, land-acquisition, buffer zones, etc.) are not feasible given the dense urban character of the study area.

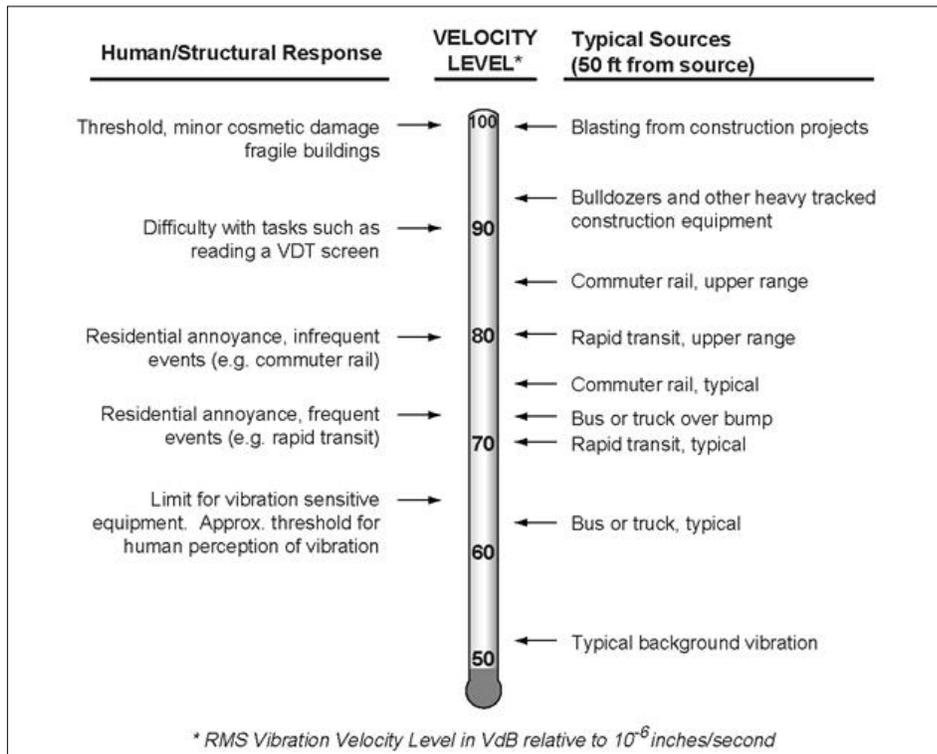
3.0 Operational Vibration Analysis

3.1 Descriptors and Fundamentals

Unlike noise, which travels in air, vibration typically travels along the surface of the ground. Depending on the geological properties of the surrounding terrain and the type of building structure exposed to transit vibration, vibration may or may not occur. Human responses and responses by monitoring instruments and other objects to vibration are most accurately described by velocity. Therefore, the vibration velocity level is used to assess vibration impacts from transportation projects.

To describe the human response to vibration, the average vibration amplitude (called the root mean square, or RMS, amplitude) is used to assess impacts. The RMS velocity level is expressed in inches per second (ips) or vibration velocity levels in decibels (VdB). All VdB vibration levels are referenced to one micro-inch per second (μips). Like noise decibels, vibration decibels are dimensionless because they are referenced to (i.e., divided by) a standard level (such as 1×10^{-6} ips in the United States). This convention allows compression of the scale over which vibration occurs, such as 40 - 100 VdB rather than 0.0001 ips to 0.1 ips. Typical RMS vibration levels from transit and other common sources are documented in FTA’s guidance manual on *Transit Noise and Vibration Impact Assessment* (May 2006) and are shown in **Figure 7**.

Figure 7: Typical Ground-Borne Vibration Levels



Source: FTA, *Transit Noise and Vibration Impact Assessment* (May 2006).

3.1.1 FTA Operational Vibration Impact Criteria

The vibration assessment of the proposed streetcar service was prepared in accordance with the National Environmental Policy Act (NEPA) and the guidelines set forth by the Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment* (May 2006). The operational vibration analyses examine Build Alternatives 1 and 2, including the connecting track to the DC Streetcar Car Barn Training Center. Other elements, including the traction powered substations and propulsion system (wired or wireless) would not be sources of vibration and, therefore, are not analyzed. Roadway traffic vibration was assessed qualitatively as FTA's methodology does not provide a means to analyze roadway traffic vibration and because the potential for traffic vibration is the same for the No-Build and build alternatives (because traffic volumes under each alternative would be the same).

FTA's operational vibration impact criteria for evaluating ground-borne vibration impacts from train pass-bys at nearby sensitive receivers are shown in **Table 12**. These vibration criteria are related to ground-borne vibration levels that result in human annoyance and are based on RMS velocity levels expressed in VdB referenced to one micro inch per second (μ ips). FTA's experience with community response to ground-borne vibration indicates that when there are only a few train events per day, it would take higher vibration levels to evoke the same community response as that from more frequent events. This is considered in FTA's criteria by distinguishing between projects with frequent, occasional, and infrequent events, where the frequent events category is defined as more than 70 events per day. Similarly, the occasional events category is defined as between 30 and 70 events per day while the infrequent events category is defined as less than 30 events per day. To be conservative, the FTA's frequent criteria were used to assess ground-borne vibration impacts in the study area.

FTA's operational vibration impact criteria shown in **Table 12** are defined in terms of human annoyance for different land use categories such as high sensitivity (Category 1), residential (Category 2), and institutional (Category 3). In general, the vibration threshold of human perceptibility is approximately 65 VdB.

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Table 12: Ground-Borne RMS Vibration Impact Criteria for Annoyance during Operations and Construction (VdB)

Receptor Land Use		RMS Vibration Levels (VdB)			Ground-borne Noise Levels (dBA)		
Category	Description	Frequent Events	Occasional Events	Infrequent Events	Frequent Events	Occasional Events	Infrequent Events
1	Buildings where low vibration is essential for interior operations	65	65	65	N/A	N/A	N/A
2	Residences and buildings where people normally sleep	72	75	80	35	38	43
3	Daytime institutional and office use	75	78	83	40	43	48
Specific Buildings	TV/Recording Studios/Concert Halls	65	65	65	25	25	25
	Auditoriums	72	80	80	30	38	38
	Theaters	72	80	80	35	43	43

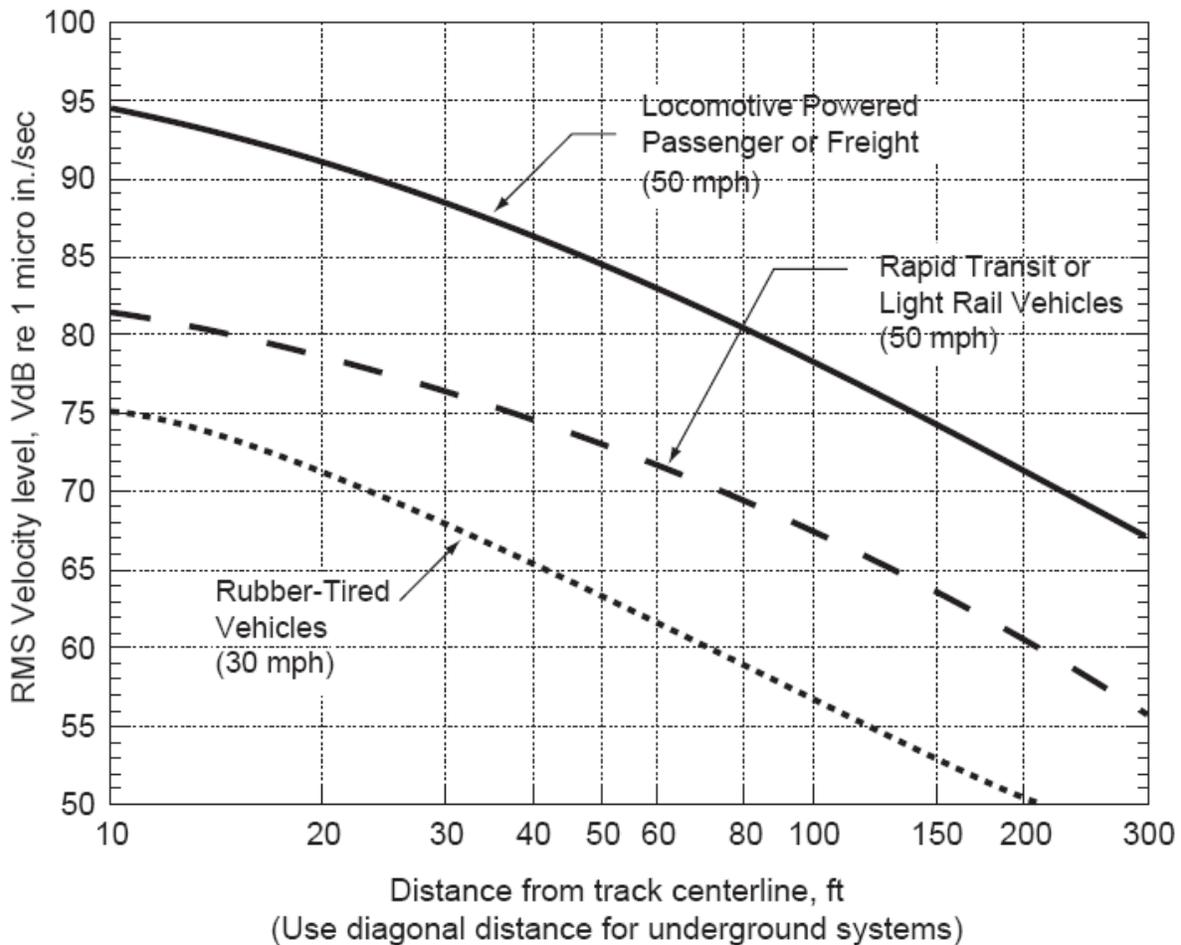
SOURCE: *Transit Noise and Vibration Impact Assessment, FTA, Washington, DC, May 2006.*

3.1.2 Operational Vibration Modeling Assumptions

Future ground-borne vibration levels from streetcar pass-bys were predicted using the default ground surface vibration curves in FTA’s guidance manual and are shown in **Figure 8**. These curves were adjusted to reflect local conditions (where applicable) such as changes in train speed, special track work such as switches, and different receiver building construction types (for example, masonry versus timber).

Additionally, future ground-borne vibration levels from streetcar pass-bys were predicted using the measured data reported in the study for the original streetcar project (*Noise and Vibration Technical Report for H Street/Benning Road Streetcar Project, April 2013*). The vibration levels measured as part of the previous study were collected close to the western terminus of the proposed action. Specifically, maximum vibration levels from Sites V-3 and V-4 of the previous study were used to compare with the default FTA ground-surface curves. As a result, the empirical data from the previous study can be reasonably applied to the current assessment. The maximum vibration levels from both sources were used to assess impact.

Figure 8: FTA Generalized Ground Surface Vibration Curves



3.2 Affected Environment – Operational Vibration

Land uses adjacent to Benning Road are an urban mix of low-medium density residential, commercial and public uses including several parks as described in more detail in Chapter 3 of the EA for the proposed action. Although some residential properties have small front yards, buildings are close to the existing roadway. The primary source of vibration in the study area is roadway traffic on Benning Road. Vibration from traffic impacts adjacent properties in the existing condition when trucks or buses travel over discontinuous pavement causing a vibration event.

3.3 Environmental Consequences – Operational Vibration

The No-Build Alternative will not introduce new sources of noise from the proposed action, and as a result, no new transit noise impacts or new transit vibration impacts will occur under the No-Build Alternative. This section describes the results of operational vibration analyses for the No-

Build and build alternatives. By evaluating differences in vibration levels between the 2040 No-Build Alternative and the build alternatives, the relative impact of the proposed action on vibration levels can be better understood and considered in project planning.

The operational noise analyses examine Build Alternatives 1 and 2, including streetcar operations (travel on the tracks in Benning Road, vehicle stops to pick up or discharge passengers, and travel on the connecting track to the DC Streetcar Car Barn Training Center). Other streetcar infrastructure elements, including the traction powered substations and propulsion system (wired or wireless) would not be sources of noise and, therefore, are not analyzed. Noise from traffic on Benning Road is also analyzed.

3.3.1 No-Build Alternative

Future vibration levels under the No-Build Alternative would be like those currently experienced under existing conditions. Traffic, including heavy trucks and buses, rarely creates perceptible ground-borne vibration unless vehicles are operating very close to buildings or there are irregularities in the road, such as potholes or expansion joints. The pneumatic tires and suspension systems of automobiles, trucks, and buses eliminate most ground-borne vibration.

3.3.2 Build Alternative 1

3.3.3 Streetcar Operations

Vibration impacts due to streetcar pass-bys are unlikely to occur under Build Alternative 1 due to the slow travel speeds along the in-street running rail corridor. Streetcars are generally lighter than typical light rail transit vehicles for which FTA has developed reference ground-surface vibration curves. Vibration impacts resulting from steel wheel on steel rail interactions were evaluated using a speed of 25 mph. Six exceedances of FTA's vibration "annoyance" impact criteria for *frequent* events were predicted at FTA Category 2 land uses using FTA's default ground-surface curves.

However, exceedances of FTA's operational vibration impact criteria are predicted using the measured data reported in the *Noise and Vibration Technical Report for H Street/Benning Road Streetcar Project*, April 2013. Thus, these latter data were applied to this analysis and not the FTA's vibration curves. As shown in Table 13, the maximum vibration levels using the H/Benning streetcar study information along Benning Road under Build Alternative 1 are predicted to range from 58 VdB at Receptor M1 (residences along 34th Street) to 75 VdB at Receptor M2 (residences along Benning Road). The default FTA ground-surface vibration levels are predicted to range from 67 VdB at Receptor M2 to 68 VdB at Receptor M1. The proposed action vibration level at Receptor M2 is predicted to exceed FTA's impact criterion of 72 VdB using the H/Benning streetcar study data.

Table 13: Predicted Streetcar Vibration Levels at Select Receptors - Build Alternative 1 (VdB)

ID	Receptor Description	FTA Cat.	Build Alternative		FTA Criteria	
			H St Report	Default FTA	Frequent	Impact
M1	Residences adjacent to the River Terrace Elementary School, 34 th Street	2	58	68	72	No
M2	Residences, Benning Road at 41 st Street opposite Fort Mahan Park	2	75	67	72	Yes (H St)

Source: Benning Road and Bridges Transportation Improvements EA Project Team, October 2014.

The number of vibration impacts due to streetcar operations in the study area is quantified in **Table 14**. Specifically, exceedances of FTA’s *frequent* vibration impact criterion of 72 VdB are predicted at 40 residences (or Category 2 land uses) along Benning Road less than 50 feet from Build Alternative 1. Similarly, one exceedance of FTA’s operational vibration impact criterion of 75 VdB is predicted at an institutional receiver (Dorothy I. Height/Benning Neighborhood Library). No exceedances of FTA’s operational vibration impact criteria are predicted at any Category 1 land use under Build Alternative 1. The predicted vibration impacts for Build Alternative 1 are shown graphically in **Figure 5**.

Table 14: No. Vibration Impacts Predicted for Streetcar Operations - Build Alternative 1

Metric	Vibration Impacts	
	Per H St Report	Per Default FTA
1	0	0
2	40	6
3	1	0

3.3.4 Traffic Operations

Like the No-Build Alternative, Traffic, including heavy trucks and buses, would rarely create perceptible ground-borne vibration unless vehicles are operating very close to buildings or there are irregularities in the road, such as potholes or expansion joints.

3.3.5 Preferred Alternative

3.3.6 Streetcar Operations

Like Build Alternative 1, significant vibration impacts due to streetcar pass-bys are unlikely to occur under The Preferred Alternative due to the slow travel speeds along the in-street running rail corridor. Vibration impacts resulting from steel wheel on steel rail interactions were evaluated using a speed of 25 mph. Six exceedances of FTA’s vibration “annoyance” impact criteria for *frequent* events were predicted at FTA Category 2 land uses using FTA’s default ground-surface curves.

However, exceedances of FTA’s operational vibration impact criteria are predicted using the measured data reported in the *Noise and Vibration Technical Report for H Street/Benning Road Streetcar Project*, April 2013. Thus, these latter data were applied to this analysis and not FTA’s

vibration curves. As shown in **Table 15**, the maximum vibration levels using the H/Benning streetcar study information along Benning Road under The Preferred Alternative are predicted to range from 57 VdB at Receptor M1 (residences along 34th Street) to 72 VdB at Receptor M2 (residences along Benning Road). The default FTA ground-surface vibration levels are predicted to range from 67 VdB at Receptor M2 to 68 VdB at Receptor M1. The proposed action vibration level at Receptor M2 is predicted to exceed FTA’s impact criterion of 72 VdB using the H/Benning streetcar study data.

Table 15: Predicted Streetcar Vibration Levels at Select Receptors - Preferred Alternative (VdB)

ID	Receptor Description	FTA Cat.	Build Alternative		FTA Criteria	
			H St Report	Default FTA	Frequent	Impact
M1	Residences adjacent to the River Terrace Elementary School, 34 th Street	2	57	68	72	No
M2	Residences, Benning Road at 41 st Street opposite Fort Mahan Park	2	72	67	72	Yes (H St)

The number of vibration impacts due to streetcar operations in the study area is quantified in **Table 16**. Specifically, exceedances of FTA’s *frequent* vibration impact criterion of 72 VdB are predicted at 20 residences (Category 2 land uses) along Benning Road less than 50 feet from Build Alternative 1. Similarly, one exceedance of FTA’s impact criterion of 75 VdB is predicted at an institutional receiver (Dorothy I. Height/Benning Neighborhood Library). No exceedances of FTA’s operational vibration impact criteria are predicted for any Category 1 land uses. The predicted vibration impacts for The Preferred Alternative are shown graphically in **Figure 6**.

Table 16: No. of Vibration Impacts Predicted for Streetcar Operations - Preferred Alternative

Metric	Vibration Impacts	
Cat.	Per H St Report	Per Default FTA
1	0	0
2	20	6
3	1	0

3.3.7 Traffic Operations

Like the No-Build Alternative, traffic, including heavy trucks and buses, would rarely create perceptible ground-borne vibration unless vehicles are operating very close to buildings or there are irregularities in the road, such as potholes or expansion joints.

3.3.8 Operational Vibration Impacts Mitigation

Mitigation for vibration impacts generated by steel wheel – steel rail interactions will come in the form of ballast mats, spring frogs, pointless switches, flange-bearing frogs, and similar designed to reduce vibration levels by approximately 10 VdB. Other measures which can reduce the severity of vibrations include resilient fasteners, undertie pads, and floating pads. Resilient fasteners, for

example, are stiffer than traditional fasteners and are therefore reduce the ability of streetcar rails to vibrate against the concrete track slabs. The deployment of these devices will be established during final design. More information on the function and benefit of each of these mitigation measures can be found in Section 6.5 (Step 4) of the FTA’s Transit Noise and Vibration Impact Assessment Manual.

3.4 Indirect and Cumulative Effects

Noise levels within the study area would increase as a result of the proposed action. Any other planned projects in the study area have the potential to increase noise because of increased traffic and construction activities.

3.5 Construction Noise and Vibration Impacts and Mitigation

Noise levels from construction activities would be a nuisance at nearby sensitive receivers such as residences, hotels, and schools. Noise levels during construction would vary depending on the types of construction activity and equipment used for each stage of work. Heavy machinery, the major source of noise in construction, would be constantly moving and not usually at one location for very long. For example, construction activities would include embedding track, rehabilitating bridges, relocating utilities, reconstructing street intersections, constructing stations stops, and other ancillary facilities (i.e., overhead contact system [OCS] poles, TPSS, etc.).

Activities associated with construction staging and/or material lay down areas would result in noise impacts if located in noise-sensitive areas. For that reason, noise-sensitive areas would be avoided to the extent reasonably feasible. Similarly, there would also be the potential for noise increases along detour routes and truck haul routes.

This analysis makes conservative assumptions regarding construction noise and vibration in order to ensure that potential impacts are analyzed and disclosed consistent with NEPA requirements. Noise and vibration impacts associated with construction, however, would be refined in project design when a detailed construction plan is more fully developed.

3.5.1 Construction Noise and Vibration Impacts Mitigation

DDOT will prepare and implement a Noise, Vibration and Air Quality Management Plan as part of the Construction Management Plan to prescribe practices DDOT will undertake to mitigate noise and vibration impacts from construction as reasonably feasible. The plan will identify specific control measures, such as the following typical strategies:

- Complying with local construction noise and vibration limits to the extent reasonably feasible;
- Whenever possible, conducting all construction activities during daytime and during weekdays;
- Where practical, erecting noise barriers between noise-generating construction activities;
- Requiring the use of housings or enclosures to minimize the impacts of noise producing machinery;
- Requiring the use of efficient silencers on air intakes for equipment and efficient intake and exhaust mufflers on internal combustion engines;
- Requiring that the lining of hoppers and storage bins include sound deadening material;

- Locating construction equipment and material staging areas as far away from sensitive receivers as possible;
- Establishing a control plan that identifies monitoring locations and the timing of monitoring measurements to be taken at the boundaries of construction sites and at nearby residential, commercial, and industrial property lines to ensure compliance with local construction noise and vibration regulations;
- Conducting all operations in a manner that will minimize, to the greatest extent feasible, disturbance to the public in areas adjacent to the construction activities and to occupants of nearby buildings;
- Requiring the construction contractor to implement appropriate noise and vibration control measures to minimize potential impacts during construction activities. Typical mitigation measures include substituting equipment with lower noise and vibration levels or conducting a pre-construction survey of any buildings potentially susceptible to construction vibration. Implementation of mitigation measures would ensure that noise impacts would be reduced to a less than significant level; and
- Giving consideration in the MOT plan to the noise and vibration impacts when planning alternate routes for detours, emergency vehicles, and truck haul routes.

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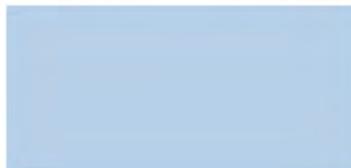
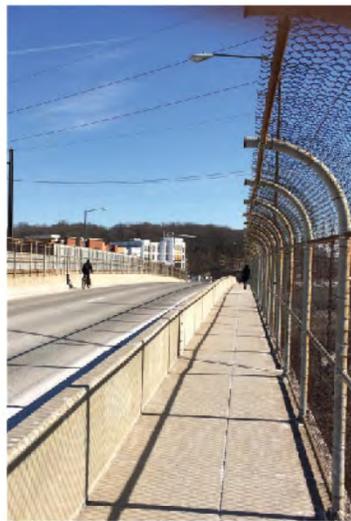
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BENNING ROAD & BRIDGES TRANSPORTATION IMPROVEMENTS

AIR QUALITY

FINAL SEPTEMBER 2020



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EXECUTIVE SUMMARY

The District Department of Transportation (DDOT) conducted an air quality analysis to evaluate the potential for impact as a result of the Benning Road and Bridges Transportation Improvements project (the “proposed action”). This analysis was conducted in accordance with the guidelines established by the Environmental Protection Agency (EPA) and DDOT. The EPA is the federal agency that develops and enforces the regulations which help govern air quality on a national level and provide guidance at the state level. Air quality impacts are typically evaluated against the National Ambient Air Quality Standards (NAAQS), which were established as part of the 1970 federal Clean Air Act (CAA) to protect the public health.

In accordance with EPA and DDOT guidance under the CAA transportation conformity rule, an air quality assessment typically consists of a hot spot analysis, which is an intersection assessment and a dispersion modeling analysis for computing carbon monoxide (CO) concentrations at candidate intersections along the corridor. Motor vehicles emit CO at the highest rates when they are operating at low speeds or idling. For this reason, the potential for adverse air quality impacts is greatest at intersections where traffic is most congested. For modeling purposes, only the worst-case condition (or the alternative with the highest congestion) was modeled between the two build alternatives.

Under the build alternatives in the 2018 build year and 2040 horizon year, the maximum one-hour CO concentration in the study area is predicted to be 5.8 parts per million (ppm) in 2018 build year at Site 1, Benning Road and East Capitol Street. The maximum predicted eight-hour CO concentration is 4.4 ppm and occurred at the same intersection in 2018. All predicted CO concentrations for the 2018 and 2040 build alternatives are less than the NAAQS of 35 ppm for a one-hour average and 9 ppm for an eight-hour average.

Based on the analysis, no impacts are predicted as a result of the proposed action. Therefore, no operational air quality mitigation measures are required, and the proposed action would be in conformance with the CAA transportation conformity rule requirements.

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Table of Contents

1.0	INTRODUCTION	1
1.1	PROJECT OVERVIEW	1
1.2	PURPOSE OF REPORT	1
2.0	POLLUTANTS AND REGULATORY SETTING	3
2.1	RELEVANT POLLUTANTS	3
2.2	POLLUTANTS OF CONCERN	4
2.3	REGULATORY SETTING	5
2.4	EVALUATION CRITERIA	5
3.0	METHODOLOGY	7
4.0	AFFECTED ENVIRONMENT	9
5.0	ENVIRONMENTAL CONSEQUENCES	9
5.1	NO-BUILD ALTERNATIVE	9
5.2	BUILD ALTERNATIVES	9
5.2.1	<i>Build Alternative 1</i>	10
5.2.2	<i>Build Alternative 2</i>	15
5.3	CONSTRUCTION IMPACTS	17
5.4	INDIRECT AND CUMULATIVE EFFECTS	17
6.0	MITIGATION	17
6.1	OPERATIONAL	17
6.2	CONSTRUCTION	18
7.0	SUMMARY	19
8.0	REFERENCES	19
	ATTACHMENT A: AIR QUALITY INPUT DATA	1
	ATTACHMENT B: CLRP & TIP ITEMS	1

List of Figures

FIGURE 1: PROJECT STUDY AREA	2
FIGURE 2: BENNING ROAD AND EAST CAPITOL STREET INTERSECTION MODEL CONFIGURATION	12
FIGURE 3: BENNING ROAD AND MINNESOTA AVENUE INTERSECTION MODEL CONFIGURATION	13

List of Tables

TABLE 1: NATIONAL AMBIENT AIR QUALITY STANDARDS	7
TABLE 2: INTERSECTION SCREENING	11
TABLE 3: PREDICTED HOT SPOT WORST-CASE CO CONCENTRATION LEVELS	14
TABLE A-1: PEAK HOUR TRAFFIC VOLUMES	A-2
TABLE A-2: RED TIME AND INTERSECTION CYCLE TIME (IN SEC)	A-3

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Acronyms

CAA	Clean Air Act
CLRP	Constrained Long Range Plan
CO	Carbon Monoxide
DCMR	District of Columbia Municipal Regulations
DDOE	District Department of the Environment
DDOT	District Department of Transportation
EA	Environmental Assessment
EPA	Environmental Protection Agency
FHWA	Federal Highway Administration
FRA	Federal Railroad Administration
FTA	Federal Transit Administration
LOS	Level of Service
MOVES	Motor Vehicle Emissions Simulator
MWCOG	Metropolitan Washington Area Council of Governments
MVEB	Motor Vehicle Emissions Budget
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act (NEPA)
NO ₂	Nitrogen Dioxide
NO _x	Oxides of Nitrogen
O ₃	Ozone
PM	Particulate Matter
POM	polycyclic organic matter
ppm	parts per million
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
SO _x	Oxides of Sulfur
TIP	Transportation Improvement Program
TPB	Transportation Planning Board
ULSD	Ultra-Low Sulfur Diesel

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1.0 Introduction

1.1 Project Overview

The District Department of Transportation (DDOT), in conjunction with the Federal Highway Administration (FHWA), is proposing transportation improvements (the “proposed action”) along the Benning Road corridor in Washington, DC. The proposed action would improve transportation infrastructure conditions; enhance safety and operations along the corridor at key intersections; enhance pedestrian and bicycle facilities; and extend streetcar transit service. FHWA is the lead federal agency with DDOT (the Applicant) as joint lead. The agencies are preparing an Environmental Assessment (EA) for the proposed action in accordance with the National Environmental Policy Act (NEPA) as well as other federal and local laws.

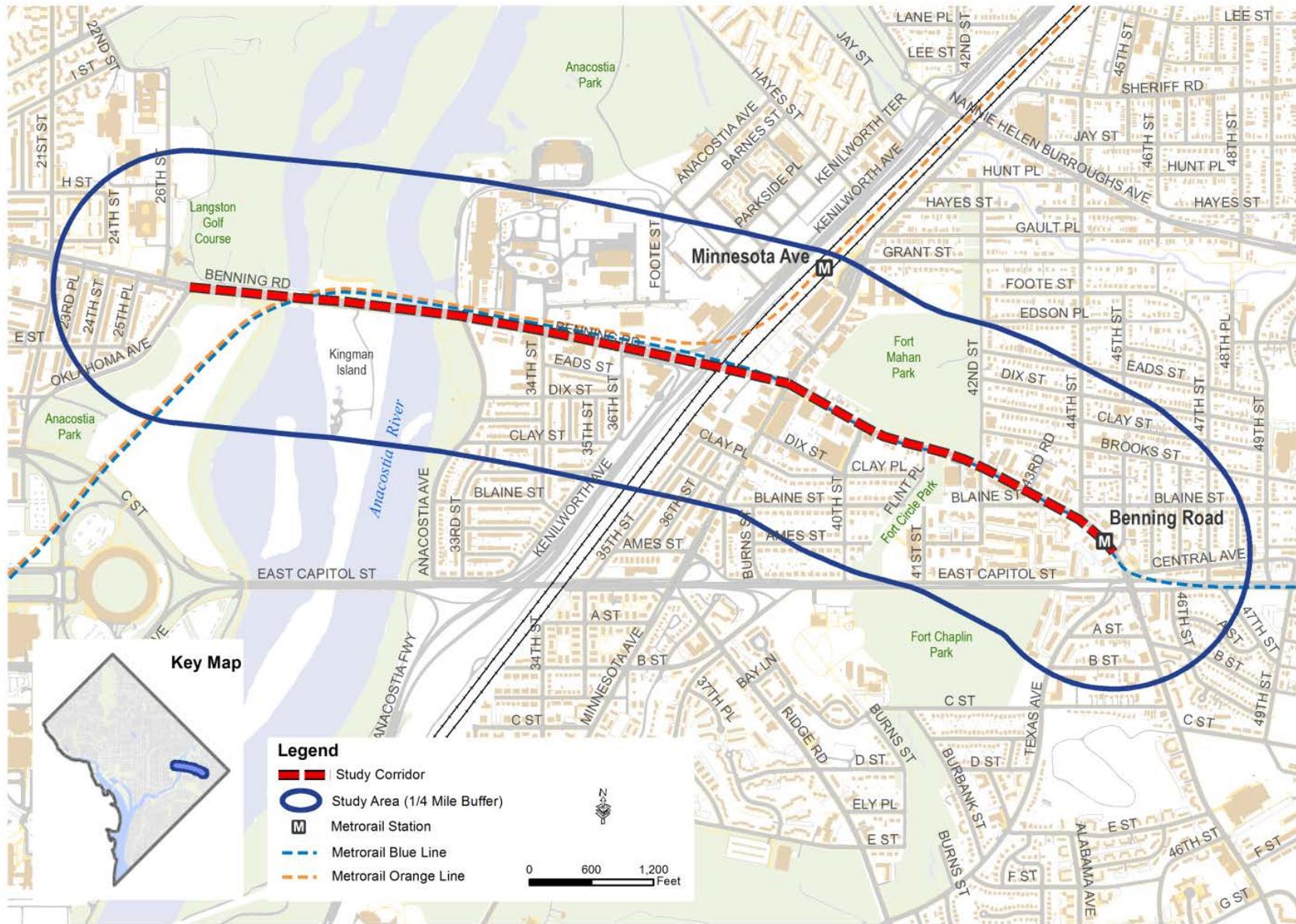
The Benning Road corridor is located within the Northeast section of Washington, DC and is approximately two miles long. The study area is shown in **Figure 1**. The western terminus for the proposed action is the intersection of Benning Road and Oklahoma Avenue. This intersection is also the eastern terminus of one of the District’s initial streetcar lines, the H/Benning Streetcar Line. The eastern terminus for the proposed action is the Benning Road Metrorail Station. The proposed improvements would be primarily in existing DDOT right-of-way. The proposed action is included in the adopted National Capitol Region Transportation Planning Board’s Transportation Improvement Program (TIP) and the Constrained Long Range Plan (CLRP).

The purpose of the Benning Road and Bridges Transportation Improvements project is to address deficiencies in transportation infrastructure conditions, improve safety conditions and operations for both motorized and non-motorized access, and to provide for increased mobility and accessibility by improving transit operations and options between the intersection of Benning Road and Oklahoma Avenue and the Benning Road Metrorail Station.

1.2 Purpose of Report

The purpose of this technical report is to describe potential air quality impacts associated with the Benning Road and Bridges Transportation Improvements project (“the proposed action”), and proposed mitigation measures where such is warranted.

Figure 1: Project Study Area



2.0 Pollutants and Regulatory Setting

2.1 Relevant Pollutants

"Air Pollution" is a general term that refers to one or more chemical substances that degrade the quality of the atmosphere. Individual air pollutants degrade the atmosphere by reducing visibility, damaging property, reducing the productivity or vigor of crops or natural vegetation, or reducing human or animal health. Regulations for air pollutant emissions exist to protect human health and welfare, and the environment.

The federal agency that develops and enforces the regulations that help govern air quality is the Environmental Protection Agency (EPA). The 1970 federal Clean Air Act (CAA) established National Ambient Air Quality Standards (NAAQS) to protect the public health. Eight air pollutants have been identified by the EPA as being of concern nationwide: carbon monoxide, sulfur oxides, hydrocarbons, nitrogen oxides, ozone, particulate matter sized 10 micrometers or less, particulate matter sized 2.5 micrometers or less, and lead. The sources of these pollutants, their effects on human health, and their concentrations in the atmosphere vary considerably. Below is a brief description of each pollutant.

- **Ozone (O₃)** is a strong oxidizer and a pulmonary irritant that affects the respiratory mucous membranes, other lung tissues, and respiratory functions. Exposure to ozone can impair the ability to perform physical exercise, can result in symptoms such as tightness in the chest, coughing, and wheezing, and can ultimately result in asthma, bronchitis, and emphysema. Motor vehicles do not emit ozone directly. Emissions of volatile organic compounds (VOC) and nitrogen oxides (NO_x), which are the precursor pollutants to ozone formation, react in the presence of sunlight to form ozone in the atmosphere. These reactions occur over periods of hours to days during atmospheric mixing and transport downwind. Accordingly, ozone and its precursors VOC and NO_x are regulated at the regional level as part of the Metropolitan Washington Council of Governments' (MWCOCG) transportation plan.
- **Carbon Monoxide (CO)** is a colorless and odorless gas, which is a product of incomplete combustion. CO is absorbed by the lungs and reacts with hemoglobin to reduce the oxygen carrying capacity of the blood. At low concentrations, CO has been shown to aggravate the symptoms of cardiovascular disease, can cause headaches, nausea, and at sustained high concentration levels, can lead to coma and death. CO concentrations are not related to ozone levels. CO concentrations tend to be highest in localized areas because they are most affected by local traffic congestion, since motor vehicles are a major source of CO emissions.
- **Particulate matter (PM₁₀ and PM_{2.5})** is made up of small solid particles and liquid droplets. PM₁₀ refers to particulate matter with an aerodynamic diameter of 10 microns and smaller, and PM_{2.5} refers to particulate matter with an aerodynamic diameter of 2.5 microns and smaller. Particulates enter the body by way of the respiratory system. Particulates over 10 microns in size are captured in the nose and throat and are readily expelled from the body. Particles smaller than 10 microns, and especially particles smaller than 2.5 microns, can reach the air ducts (bronchi) and the air sacs

(alveoli). Particulates, especially PM_{2.5}, have been associated with increased incidence of respiratory diseases such as asthma, bronchitis, and emphysema; cardiopulmonary disease; and cancer. The majority of PM emissions from mobile sources are attributed to diesel vehicles.

- **Sulfur dioxide (SO₂)** is a gas that is formed during the combustion of fuels containing sulfur compounds. SO₂ can cause irritation and inflammation of tissues with which the pollutant comes into contact. Inhalation can cause irritation of the mucous membranes causing bronchial damage, and SO₂ can exacerbate pre-existing respiratory diseases such as asthma, bronchitis, and emphysema. Exposure to SO₂ can cause damage to vegetation, corrosion to metallic materials, and soiling of clothing and buildings. Due to the implementation of EPA's Ultra-Low Sulfur Diesel Fuel Requirements taking effect since 2006, SO₂ is not considered to be a concern as a result of the project.
- **Lead (Pb)** is no longer considered to be a pollutant of concern for transportation projects. The major source of lead emissions to the atmosphere had been from motor vehicles burning gasoline with lead-containing additives. However, lead emissions have nearly been eliminated with the conversion to unleaded gasoline nationwide.
- **Mobile Source Air Toxics (MSAT)** are a subset of the 187 air toxics defined by the Clean Air Act. Most air toxics originate from human-made sources, including on-road mobile sources, non-road mobile sources (e.g., locomotives, airplanes), area sources (e.g., dry cleaners), and stationary sources (e.g., factories or refineries). The EPA currently includes 21 air toxics in the full list of MSATs, and identifies seven of those as primary MSATs. The seven primary MSATs are benzene, formaldehyde, naphthalene, diesel particulate matter/diesel exhaust gases, acrolein, 1, 3-butadiene, and polycyclic organic matter (POM). Some toxic compounds are present in fuel and are emitted to the air when the fuel evaporates or passes through the engine unburned. Other toxics are emitted from the incomplete combustion of fuels or as secondary combustion products. Metal air toxics also result from engine wear or from impurities in oil, diesel fuel, or gasoline. Currently, no established ambient air quality standards exist for MSATs.

2.2 Pollutants of Concern

The pollutants that are most important for this air quality assessment are those that are traceable principally to motor vehicle engines and electrical power plants. In the study area, ambient concentrations of CO and O₃ are predominantly influenced by roadway motor vehicle activity. Emissions of VOCs, NO_x, PM₁₀, and PM_{2.5} come from both mobile and stationary sources while emissions of SO_x and Pb are associated mainly with various stationary sources. Pollutant emissions from electric-powered transit vehicles are considered to be minor and occur well outside the study area. Emissions are considered minor partly because of the small proportion of projected future train activity compared with existing and future roadway motor vehicle activity in the study area. Electricity purchased from the national electrical grid may be produced by either fossil-fueled plants or renewable energy plants, or even both.

CO is the primary pollutant used to indicate the potential for adverse air quality impacts from motor vehicles in general, and at roadway intersections in particular. CO is used as an indicator because roadway motor vehicles produce most of the ambient CO, and emission rates of CO from vehicles are relatively high in comparison to emissions of other pollutants. The federal and state

ambient air quality standards are set up in such a way that, should adverse impacts occur, the CO standard would most likely be exceeded first.

Similarly, PM_{2.5} is also evaluated especially since the proposed action is located in a nonattainment area. However, since PM_{2.5} is most prevalent in diesel-powered vehicles, impacts from the proposed action do not require consideration because the proposed action is not of air quality concern as defined by the transportation conformity rule as defined in 40 CFR 93.123(b)(1).

Similarly, because O₃ is a regional pollutant that is formed in the presence of VOC and NO_x, O₃ is evaluated indirectly through its precursors. However, because the CO standard would be exceeded first before either NO₂ or VOCs, only CO is typically evaluated at intersection hot spots. As a result, concentrations of O₃ are typically measured directly in the atmosphere rather than through modeling predictions.

2.3 Regulatory Setting

The Federal Railroad Administration (FRA) *Procedures for Considering Environmental Impacts* (FRA Docket No EP-1, Notice 5, May 26, 1999), states under the topic of Air Quality, “There should be an assessment of the consistency of the alternatives with Federal and State plans for the attainment and maintenance of air quality standards.”

The Clean Air Act (CAA), as amended, is the basis for most federal air pollution control programs. Under the CAA, the EPA regulates air quality nationally. The EPA delegates authority to the District Department of the Environment (DDOE) for monitoring and enforcing air quality regulations in the District of Columbia. The Washington, DC-MD-VA Region State Implementation Plan (SIP), developed in accordance with the CAA, contains the major state-level requirements with respect to transportation in general. The MWCOG is responsible for preparing the SIP and submitting it to the EPA for approval.

2.4 Evaluation Criteria

Under the authority of the CAA, the EPA established a set of National Ambient Air Quality Standards (NAAQS) for various “criteria” air pollutants. **Table 1** lists the NAAQS for the seven criteria pollutants: O₃, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, and Pb. Any project constructed in the District of Columbia has to achieve compliance with these standards.

Areas where ambient concentrations of a criteria pollutant are below the corresponding NAAQS are designated as being in “attainment”. Areas where a criteria pollutant level exceeds the NAAQS are designated as being in “nonattainment.” A maintenance area is one that has been re-designated from nonattainment status and has an approved maintenance plan under Section 175 of the CAA. Where insufficient data exist to determine an area’s attainment status, the area is designated unclassifiable or in attainment. O₃ nonattainment areas are categorized as marginal, moderate, serious, severe, or extreme. CO and PM₁₀ nonattainment areas are categorized as moderate or serious. The District of Columbia, within which the study area lies, has been designated as:

- Nonattainment area for the O₃ standard

- Maintenance area for PM_{2.5} and CO standards
- Attainment area for all other criteria pollutant standards

Under the CAA, federal agencies are responsible to ensure that a project conforms to the SIP. The EPA also developed the CAA transportation conformity rule (40 CFR 51.390 and Part 93), applicable to transportation projects funded and approved by FHWA and/or FTA in nonattainment and maintenance areas for the transportation related criteria pollutants: O₃, PM_{2.5}, PM₁₀, NO₂ and CO. The transportation conformity rule requires the analysis of project-related air emissions to show the project would not cause or contribute to any new violations of NAAQS and would be in conformance of the corresponding SIPs and the established motor vehicles emissions budget (MVEB). The National Capital Region Transportation Planning Board (TPB) is responsible for developing the SIP-conforming Transportation Improvement Program (TIP) to address mobile source emissions within the region. Two levels of transportation conformity exist:

- Regional conformity: Applicable to metropolitan transportation plans and TIPs. For the metropolitan Washington region, the transportation plan is known as National Capital Region's Financially Constrained Long-Range Transportation Plan (CLRP) and the FY 2013-2018 Transportation Improvement Program is the current TIP. The regional conformity determination must show the total emissions from on-road travel on the region's transportation system are within the MVEB outlined in the SIP and are consistent with the goals for air quality found in the SIP. The regional emissions analysis must include all federally funded projects; non-federally funded projects considered regionally-significant projects; and non-federally funded and/or non-regionally significant projects that will affect vehicle travel in the area. Regional conformity determination is made by the TPB. Because the proposed project is listed in an approved CLRP (Project #1669) and TIP (Project #5754), the project has met the regional conformity determination (**See Attachment B**).
- Project-level conformity: For specific transportation projects, the conformity determination must show the individual project is consistent with the regional conformity determination and that potential localized emissions impacts are addressed and are consistent with goals for air quality found in the SIP. The state or local transportation agency is responsible for the project-level conformity determination. The analysis presented herein documents how the project meets the project-level conformity requirement through a hot spot analysis.

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Table 1: National Ambient Air Quality Standards

Pollutant	Standard Type	Averaging Period	Standard Value ^a
Carbon Monoxide (CO)	Primary ^b	8-Hour average	9 ppm (10 mg/m ³) ^c
	Primary	1-Hour average	35 ppm (40 mg/m ³)
Nitrogen Dioxide (NO ₂)	Primary and Secondary	Annual arithmetic mean	53 ppb ^d
	Primary	1-Hour average	100 ppb
Ozone (O ₃)	Primary and Secondary	8-Hour average	0.075 ppm (155 µg/m ³) ^e
Sulfur Dioxide (SO ₂)	Primary	Annual arithmetic mean	0.03 ppm (80 µg/m ³)
	Primary	24-Hour average ^g	0.14 ppm (365 µg/m ³)
	Secondary	3-Hour average	0.5 ppm (1300 µg/m ³)
	Primary	1-Hour average ^h	75 ppb (0.075 ppm)
Particulate Matter (PM ₁₀)	Primary and Secondary	24-Hour average	150 µg/m ³ ^f
Particulate Matter (PM _{2.5})	Primary and Secondary	Annual arithmetic mean	12 µg/m ³
		24-Hour average	35 µg/m ³
Lead (Pb)	Primary and Secondary	3-Month rolling average	0.15 µg/m ³

- NOTES:
- Short-term standards (1 to 24 hours) are not to be exceeded more than once per calendar year.
- Former national secondary standards for carbon monoxide have been repealed.
- Concentrations are shown in parts per million (ppm), milligrams per cubic meter (mg/m³) or micrograms per cubic meter (µg/m³).
- The official level of the annual NO₂ standard is 0.053 ppm, equal to 53 ppb, which is shown here for the purpose of clearer comparison to the 1-hour standard.
- Maximum daily one-hour (eight-hour) average. The ozone standard is attained when the expected number of days with maximum hourly (eight-hourly) average concentrations above the value of the standard, averaged over a three year period, is less than or equal to one. The O₃ criterion was updated by the EPA on May 27, 2008 from 0.08 to 0.075 ppm.
- For each particle size, the annual PM standard is met when the three-year average of the annual mean concentration is less than or equal to the value of the standard. The 24-hour PM₁₀ (PM_{2.5}) standard is met when the three-year average of the annual 99th (98th) percentile values of the daily average concentrations is less than or equal to the value of the standard.
- National standards are block averages rather than moving averages.
- Final rule signed June 2, 2010. To attain this standard, the 3-year average of the 99th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 75 ppb.
- CO, NO₂, O₃, and PM are transportation related pollutants
- Source: 40 CFR 50, National Primary and Secondary Ambient Air Quality Standards.

3.0 Methodology

In accordance with EPA and DDOT guidance, analysis methodology typically consists of a hot spot analysis, which is an intersection assessment and a dispersion modeling analysis for computing CO concentrations at candidate intersections along the corridor. Motor vehicles emit CO at the highest rates when they are operating at low speeds or idling. For this reason, the potential for adverse air quality impacts is greatest at intersections where traffic is most congested. Using the traffic analysis prepared for the proposed action, intersections are screened or selected based on congestion and volumes. The intersection screening methods are based on EPA criteria

in the *Guidelines for Modeling Carbon Monoxide from Roadway Intersections*¹. The study area for air quality is the intersections modeled.

At each of the intersections selected for detailed air quality modeling, maximum one-hour and eight-hour CO concentrations were predicted at several receptor locations in the vicinity of the intersection where the maximum concentrations would be expected and where the public would have reasonable access. The traffic data used in the air quality analysis were based on traffic volumes and growth projection included in the *Benning Road Extension Project Traffic Report* [AECOM, October 2014].

The MWCOG inputs included model year registration distributions and vehicle mix corresponding to the greater metropolitan Washington area. The MWCOG input values for the greater metropolitan Washington area were applied to all intersections.

EPA's Motor Vehicle Emissions Simulator (MOVES) program, MOVES2010b, was used to develop the emission factors for free-flowing traffic and idling queue traffic at intersections. Based on traffic forecasts provided, the analysis was conducted for the AM and PM peak hours for the build year (Year 2018) and the horizon year (Year 2040). MWCOG has not established the MOVES input file specifically applicable for predicting emissions factors for the build year 2018. Therefore, the analysis was conducted conservatively by applying the available 2017 emission factors to the 2018 traffic forecasts to predict CO concentrations for the build year 2018.

In predicting travel link specific emission factors using MOVES, the free flow travel speed at each intersection was assumed to be 5 mph to conservatively account for the congestion at the analyzed intersection and the idling queue speed was assumed 0 mph.

Maximum one-hour and eight-hour CO concentrations were estimated using EPA's CAL3QHC Version 2.0 dispersion model². Specific modeling inputs were selected in accordance with EPA/DDOT guidance. Consistent with EPA's 1992 guidelines, eight-hour CO concentrations were estimated by multiplying the modeled one-hour results by a persistence (scale) factor of 0.7 based on local monitored data. Total CO concentrations were derived by adding to the modeled maximum concentrations a background level to account for sources of CO other than the traffic at the intersection being modeled. Background levels of 2.2 ppm for one hour and 2.0 ppm for eight hours were applied to all modeled concentrations. These background concentrations, which are based on ambient data from the closest monitoring site, 3600 Benning Road NE, were held constant for all analysis years and project alternatives.

¹ Guidelines for Modeling Carbon Monoxide from Roadway Intersections, US Environmental protection Agency, Office of Air Quality Planning and Standards, Research Triangle, NC, November 1992.

² User's Guide to CAL3QHC Version 2: A Modeling Methodology for Predicting Pollutant Concentration near Roadway Intersections, U.S. EPA-454/R-92-006, June 1993.

4.0 Affected Environment

The District Department of the Environment (DDOE) develops and implements plans and programs to meet and maintain federal and DC air quality standards. The DDOE monitors air quality to ensure that the District meets and maintains national air quality health standards. The DDOE protects and manages the region's air resources in accordance with the District's Air Pollution Control Act of 1984 (effective March 15, 1985) and Amendments as described in Title 20 of the District of Columbia Municipal Regulations (DCMR).

Based on recent monitoring data, no exceedances of the NAAQS have been reported through 2012 (the last period for which a full year of data is available) except one ozone violation on August 21, 2012. This violation of the ozone NAAQS is currently being validated by the DDOE.

Recent monitored values of secondary particulate precursors, such as NO₂ and SO₂, are decreasing. This downward trend in NO₂ and SO₂ may be due to the ultra-low sulfur diesel (ULSD) fuel that has been produced in the last few years and has been required of all manufacturers by December 1, 2010. The ULSD fuel has a sulfur content of only 15 ppm compared to the previous diesel fuel, which had a sulfur content of 500 ppm.

5.0 Environmental Consequences

This section includes a discussion of the potential operational impacts, as well as an assessment of temporary construction impacts and indirect and cumulative effects.

5.1 No-Build Alternative

Without the proposed action under the No-Build Alternative, air quality is expected to be similar to the existing conditions. With the exception of the ozone violation in August 2012 and PM_{2.5} in recent years, no exceedances of the NAAQS were reported. As a result, the study area is located in a region that has been designated by the EPA as in attainment for all criteria pollutants except ozone and PM_{2.5}.

5.2 Build Alternatives

The proposed action is located in the District of Columbia, which is in attainment or unclassifiable for all National Ambient Air Quality Standards (NAAQS) except ozone and PM_{2.5}; therefore, the transportation conformity rules apply. However, the proposed action is included in and consistent with the MWCOG financially Constrained Long-Range Transportation Plan (CLRP) (see Attachment B).

5.2.1 Build Alternative 1

5.2.1.1 CO Hot Spot Analysis

Hot Spot Screening

EPA's *Guidelines for Modeling Carbon Monoxide from Roadway Intersections* was used to select the worst-case CO hot spot analysis intersections through a screening process. Based on the highest approaching traffic volume and level of service (LOS) for the year 2040 condition at each intersection (shown in **Table 2**), two worst-case signalized intersections, Benning Road and East Capitol Street and Benning Road and Minnesota Avenue, were screened out for a further hot spot dispersion modeling analysis.

CO Concentration Modeling and Results

The EPA CAL3QHC model was used to predict the AM and PM peak hour CO concentrations for 2018 and 2040 based on the traffic forecasts performed at two worst-case intersections. The CO modeling incorporated the emission factors discussed above, the projected traffic volumes, the intersection phasing data, and the worst-case meteorological conditions. **Figure 2** and **Figure 3** depict geometric model configurations developed at the two intersections.

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Table 2: Intersection Screening

No.	Intersection	Traffic Control	Level of Service				Total Traffic Volume		Screening			
			Curb Alignment		Median Alignment		No-Build		Build LOS of D/E/F		Traffic Volume Rank for Intersections with LOS of D/E/F	
			AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
1	Benning Road and 26 th Street	Signalized	A	B	A	B	3988	3415	No	No	-	-
2	Benning Road and Oklahoma Avenue	Signalized	C	A	C	A	4207	3570	No	No	-	-
3	Benning Road and Anacostia Avenue	Signalized	A	A	A	A	4251	3511	No	No	-	-
4	Benning Road and 34 th Street	Signalized	B	C	B	B	4529	3670	No	No	-	-
5	Benning Road and Minnesota Avenue	Signalized	E	D	E	D	3902	4160	Yes	Yes	2	1
6	Benning Road and 42 nd Street	Signalized	B	B	B	B	1885	1879	No	No	-	-
7	Benning Road and 45 th Street	Unsignalized	-	-	-	-	-	-	-	-	-	-
8	Benning Road and Central Avenue	Unsignalized	-	-	-	-	-	-	-	-	-	-
9	Benning Road and E Capitol Street	Signalized	F	F	F	F	4192	3997	Yes	Yes	1	2
10	Minnesota Avenue and Dix Street	Signalized	B	B	B	B	1878	2337	No	No	-	-
11	Minnesota Avenue and Grant Street	Signalized	B	B	B	B	1709	1867	No	No	-	-
12	Minnesota Avenue and Gault Pl	Unsignalized	-	-	-	-	-	-	-	-	-	-
13	Minnesota Avenue and Hayes Street	Unsignalized	-	-	-	-	-	-	-	-	-	-
14	Minnesota Avenue and NHB Avenue	Signalized	D	E	D	E	2878	3157	Yes	Yes	3	3
15	Benning Road and 44 th Street	Signalized	C	D	B	D	2273	1952	Yes	Yes	4	4

Figure 2: Benning Road and East Capitol Street Intersection Model Configuration



Under the Build Alternative 1, traffic volumes in the study area would be expected to remain the same as under the No-Build Alternative. Although congestion is expected to increase slightly due to the addition of the streetcar corridor through the intersections, the average intersection delay times are also only expected to increase slightly between the No-Build and build alternatives. For example, the average AM peak-hour delay at the most congested intersection (Benning Road and East Capitol Street) is predicted to increase less than two percent between the No-Build and build alternative. Therefore, the concentrations under Build Alternative 1 are expected to be essentially the same as under the No-Build Alternative.

The predicted worst-case CO concentrations for Build Alternative 1 under 2018 and 2040 as summarized in **Table 3** are well below the NAAQS of 35 ppm for one-hour average and 9 ppm for eight-hour average.

Table 3: Predicted Hot Spot Worst-Case CO Concentration Levels

Intersection	CO Concentrations (ppm)			
	Build - 2018		Build - 2040	
	1-hour	8-hour	1-hour	8-hour
Benning Road and Minnesota Avenue	4.9	3.7	3.7	2.9
Benning Road and East Capitol Street	5.8	4.4	3.8	3.0

5.2.1.2 PM_{2.5} Hot Spot Analysis

In determining whether a PM_{2.5} hot spot analysis is required for the proposed Benning Road and Bridges Transportation Improvements project, the transportation conformity guidelines for determining localized CO, PM₁₀, and PM_{2.5} concentrations (hot-spot analysis), as described in 40 CFR 93.123, were reviewed. According to these guidelines, the Benning Road and Bridges Transportation Improvements project would not exceed the relevant criterion in 40 CFR 93.123(b)(1)(iii). Specifically, the proposed action would not create “new bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location.” Based on Appendix A of EPA’s *Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas* (March 2010), an example of a project that is not an air quality concern under 40 CFR 93.123(b)(1) would be a “new or expanded highway project that primarily services gasoline vehicle traffic (i.e., does not involve a significant number or increase in the number of diesel vehicles), including such projects involving congested intersections operating at LOS D, E, or F.”

Existing bus service would supplement the new streetcar service. Even if the future bus dwell times at the streetcar stops would be slightly longer than at a current bus stop, this slight increase would not result in a “significant number of diesel vehicles congregating at a single location” as defined by 40 CFR 93.123.

Therefore, based on the insignificant level of bus service proposed at the stations, neither a qualitative nor a quantitative PM_{2.5} hotspot analysis is required for this proposed action since it is not a project of local air quality concern under 40 CFR 93.123(b)(1). The CAA Amendments and

the transportation conformity requirements are met without a hotspot analysis since this proposed action has been found not to be of air quality concern under 40 CFR 93.123(b)(1). The proposed action, therefore, meets statutory and regulatory transportation conformity requirements for PM_{2.5} without a hot-spot analysis.

5.2.1.3 MSAT Impact Analysis

FHWA's *Interim Guidance Update on MSAT Analysis in NEPA* (December 2012) establishes a three-tiered approach to determine the level of MSAT analysis required by a project-level study. Project requirements are assessed following the Interim Guidance. According to the *Interim Guidance*, the category of exempt projects or projects with no meaningful potential MSAT effects includes:

- Projects qualifying as a categorical exclusion under 23 CFR 771.117(c);
- Projects exempt under the Clean Air Act conformity rule under 40 CFR 93.126; or
- Other projects with no meaningful impacts on traffic volumes or vehicle mix.

Additionally, the guidance indicates that "for projects with negligible traffic impacts, regardless of the class of NEPA environmental document, no MSAT analysis is required". The *Interim Guidance* also notes that "the types of projects categorically excluded under 23 CFR 771.117(d) or exempt from conformity rule under 40 CFR 93.127 do not warrant an automatic exemption from an MSAT analysis, but they usually will have no meaningful impact." Projects in this category do not require either a qualitative or a quantitative analysis for MSATs, although documentation of the project category is required.

Since the Proposed action falls into the category of resulting in no meaningful impacts on traffic volumes or vehicle mix, no qualitative or a quantitative analysis for MSATs is required under Build Alternative 1.

5.2.1.4 Conclusions

Based on the above analysis, the proposed Build Alternative 1 would have no significant project-level adverse impacts on air quality with respect to CO, PM_{2.5}, and MSATs. Therefore the proposed action under this alternative would be in conformance with the CAA transportation conformity rule requirements.

5.2.2 Build Alternative 2

5.2.2.1 CO Hot Spot Analysis

Under Build Alternative 2, traffic volumes in the study area would be expected to remain the same as under the No-Build Alternative and Build Alternative 1. Although congestion is expected to increase slightly due to the addition of the streetcar corridor through the intersections, the average intersection delay times are also only expected to increase slightly between the No-Build and each build alternative (i.e., the curb alignment or median alignment alternative). Therefore, the worst-case build alternative CO concentrations (summarized in **Table 3**) under the build alternatives would remain the same for Build Alternative 2 under 2018 and 2040 conditions. The

CO concentrations are well below the NAAQS of 35 ppm for one-hour average and 9 ppm for eight-hour average.

5.2.2.2 PM_{2.5} Hot Spot Analysis

In determining whether a PM_{2.5} hot spot analysis is required for the proposed Benning Road and Bridges Transportation Improvements project, the transportation conformity guidelines for determining localized CO, PM₁₀, and PM_{2.5} concentrations (hot-spot analysis) as described in 40 CFR 93.123, were reviewed. According to these guidelines, the Benning Road and Bridges Transportation Improvements project would not exceed the relevant criterion in 40 CFR 93.123(b)(1)(iii). Specifically, the proposed action would not create “new bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location.” Based on Appendix A of EPA’s *Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas* (March 2010), an example of a project that is not an air quality concern under 40 CFR 93.123(b)(1) would be a “new or expanded highway project that primarily services gasoline vehicle traffic (i.e., does not involve a significant number or increase in the number of diesel vehicles), including such projects involving congested intersections operating at LOS D, E, or F.”

Although existing buses would serve the new streetcar system, these existing bus routes currently operate in the project area and would simply supplement the new streetcar service as part of their existing routes. Even if the future bus dwell times at the streetcar stops would be slightly longer than at a current bus stop, this slight increase would not result in a “significant number of diesel vehicles congregating at a single location” as defined by 40 CFR 93.123.

Therefore, based on the insignificant level of bus service proposed at the stations, neither a qualitative nor a quantitative PM_{2.5} hotspot analysis is required for this project since it is not a project of local air quality concern under 40 CFR 93.123(b)(1). The CAA Amendments and the transportation conformity requirements are met without a hotspot analysis since this project has been found not to be of air quality concern under 40 CFR 93.123(b)(1). Therefore, the project meets statutory and regulatory transportation conformity requirements for PM_{2.5} without a hot-spot analysis.

5.2.2.3 MSAT Impact Analysis

FHWA’s *Interim Guidance* establishes a three-tiered approach to determine the level of MSAT analysis required by a project-level study. Project requirements are assessed following the *Interim Guidance*. According to the *Interim Guidance*, the category of exempt projects or projects with no meaningful potential MSAT effects includes:

- Projects qualifying as a categorical exclusion under 23 CFR 771.117(c);
- Projects exempt under the Clean Air Act conformity rule under 40 CFR 93.126; or
- Other projects with no meaningful impacts on traffic volumes or vehicle mix.

Additionally, the guidance indicates that “for projects with negligible traffic impacts, regardless of the class of NEPA environmental document, no MSAT analysis is required”. The *Interim Guidance*

also notes that "the types of projects categorically excluded under 23 CFR 771.117(d) or exempt from conformity rule under 40 CFR 93.127 do not warrant an automatic exemption from an MSAT analysis, but they usually will have no meaningful impact." Projects in this category require neither a qualitative nor a quantitative analysis for MSATs, although documentation of the project category is required.

Since the proposed project falls into the category of resulting in no meaningful impacts on traffic volumes or vehicle mix, no qualitative or a quantitative analysis for MSATs is required under Build Alternative 2.

5.2.2.4 Conclusions

Based on the above analysis, the proposed Build Alternative 2 would have no significant project-level adverse impacts on air quality with respect to CO, PM_{2.5}, and MSATs. Therefore the project under this alternative would be in conformance with the CAA transportation conformity rule requirements.

5.3 Construction Impacts

Direct emissions from construction equipment are not expected to produce adverse effects on local air quality provided that all equipment is properly operated and maintained. If required, traffic management techniques are available during the construction period that would mitigate increased emissions from traffic congestion due to lane closures, detours, and construction vehicles accessing sites.

5.4 Indirect and Cumulative Effects

Indirect impacts are those which are caused by a proposed action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects can be linked to direct effects in a causal chain. 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, water, or other natural systems, including ecosystems. The terms secondary effects or secondary impacts are often used interchangeably with indirect effects by the FHWA.

Based on the traffic analysis and the current attainment status, no adverse air quality impacts are expected, either directly or indirectly, due to the implementation and improvements proposed as part of the proposed action.

6.0 Mitigation

6.1 Operational

Since the project is located in an area that has been designated by the EPA as in attainment for all criteria pollutants except ozone and particulate matter, no exceedances of the NAAQS are

expected. Similarly, based on the detailed traffic assessment, any increases in congestion between the No-Build and the build alternatives are expected to be minor and are not expected to result in exceedances of the NAAQS. Therefore, no air quality mitigation measures are currently required.

6.2 Construction

Air quality impacts due to temporary construction activities are possible, particularly on dry and windy days. Mitigation techniques could include: development of site-specific traffic management plans; temporary signage and other traffic controls; designated staging areas; worker parking lots (with shuttle bus service if necessary) and truck routes; and prohibition of construction vehicle travel during peak traffic periods.

Potential fugitive dust impacts would be mitigated through good "housekeeping" practices such as water sprays during demolition; wetting, paving, or landscaping exposed earth areas; covering dust-producing materials during transport; limiting dust-producing construction activities during high wind conditions; and providing street sweeping and tire washes for trucks leaving the site.

[This space left intentionally blank.]

7.0 Summary

The Benning Road and Bridges Transportation Improvements project is located in an area that has been designated by the EPA as in attainment for all criteria pollutants except ozone and PM_{2.5}. Additionally, predicted traffic under each build alternative is expected to be the same or increase marginally as a result of new streetcar service. Therefore, no exceedances of the NAAQS are expected under the build alternatives. As a result, no operational mitigation measures are required.

8.0 References

40 CFR 50, National Primary and Secondary Ambient Air Quality Standards.

District Department of Transportation, *Draft Hot-Spot Analysis Guide*, December 2013.

District Department of Transportation, *2nd Edition Environmental Manual, Chapter 14 Air Quality Policy and Regulations*, June 20, 2012.

National Capital Region Transportation Planning Board/Metropolitan Washington Council of Governments, *FY 2013-2018 Transportation Improvement Program (TIP) for Metropolitan Washington Region*, Accessed <http://www.mwcog.org/clrp/> in November 2014.

National Capital Region Transportation Planning Board/Metropolitan Washington Council of Governments, *CLRP Long-Range Transportation Plan*, Accessed <http://www.mwcog.org/clrp/> in November 2014.

US Environmental Protection Agency, *Guidelines for Modeling Carbon Monoxide from Roadway Intersections*, Office of Air Quality Planning and Standards, Research Triangle, NC, November 1992.

US Environmental Protection Agency, *CLA3QHC User's guide*, September 1995.

US Environmental Protection Agency, *MOVES2010b User's Guide*, June 2012.

US Environmental Protection Agency, *Guidance document for Using MOVES in Project-Level Carbon Monoxide Analyses*, December 2010.

US Environmental Protection Agency, *Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas*, December 2010.

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Attachment A: Air Quality Input Data

- Table A-1 Peak Hour Traffic Volumes
- Table A-2 Red Time and Intersection Cycle Time (in sec)

Table A-1: Peak Hour Traffic Volumes

Intersection	Period	Northbound			Southbound			Westbound			Eastbound		
		LT	TH	RT	LT	TH	RT	LT	TH	RT	LT	TH	RT
Benning Road and E Capitol Street	2018 AM Peak	538	468	26	111	255	115	28	1632	67	282	407	109
Benning Road and Minnesota Avenue		424	478	39	65	346	431	0	892	67	172	365	216
Benning Road and E Capitol Street	2018 PM Peak	161	360	61	261	480	92	71	557	88	186	1437	215
Benning Road and Minnesota Avenue		220	642	91	12	456	140	0	327	106	470	871	415
Benning Road and E Capitol Street	2040 AM Peak	600	548	29	124	284	129	31	1231	75	315	704	122
Benning Road and Minnesota Avenue		474	534	44	72	386	481	192	407	242	0	995	75
Benning Road and E Capitol Street	2040 PM Peak	179	403	68	291	536	102	79	539	98	208	1254	240
Benning Road and Minnesota Avenue		246	246	246	246	246	246	246	246	246	246	246	246

Benning Road and Bridges Transportation Improvements Environmental Assessment
 Appendix J – Air Quality Technical Memorandum

Table A-2: Red Time and Intersection Cycle Time (in sec)

Intersection	Intersection Cycle Length (s)	RED TIMES FOR EACH MOVEMENT (s)											
		Northbound			Southbound			Westbound			Eastbound		
		LT	TH	RT	LT	TH	RT	LT	TH	RT	LT	TH	RT
NO-BUILD (2018) AM													
Benning Road and E Capitol Street	120	92	92	92	100	100	100	72	72	72	96	96	96
Benning Road and Minnesota Avenue	120	102	55	55	73	73	56	82	82	82	103	65	65
NO-BUILD (2018) PM													
Benning Road and E Capitol Street	120	101	101	101	92	92	92	95	95	95	72	72	72
Benning Road and Minnesota Avenue	120	106	65	65	79	79	43	91	91	91	84	55	55
BUILD (2018) AM CURB RUNNING													
Benning Road and E Capitol Street	120	92	92	92	100	100	100	72	72	72	96	96	96
Benning Road and Minnesota Avenue	120	100	55	55	75	75	58	82	82	82	103	65	65
BUILD (2018) PM CURB RUNNING													
Benning Road and E Capitol Street	120	101	101	101	91	91	91	95	95	95	73	73	73
Benning Road and Minnesota Avenue	120	107	66	66	79	79	42	91	91	91	83	54	54
BUILD (2018) AM MEDIAN RUNNING													
Benning Road and E Capitol Street	120	92	92	92	100	100	100	72	72	72	96	96	96
Benning Road and Minnesota Avenue	120	100	55	55	75	75	58	82	82	82	103	65	65
BUILD (2018) PM MEDIAN RUNNING													
Benning Road and E Capitol Street	120	101	101	101	91	91	91	95	95	95	73	73	73
Benning Road and Minnesota Avenue	120	107	66	66	79	79	42	91	91	91	83	54	54
NO-BUILD (2040) AM													
Benning Road and E Capitol Street	120	88	88	88	100	100	100	84	84	84	88	88	88
Benning Road and Minnesota Avenue	120	102	55	55	73	73	56	82	82	82	103	65	65
NO-BUILD (2040) PM													
Benning Road and E Capitol Street	120	100	100	100	89	89	89	96	96	96	75	75	75
Benning Road and Minnesota Avenue	120	106	65	65	79	79	43	91	91	91	84	55	55
BUILD (2040) AM CURB RUNNING													
Benning Road and E Capitol Street	120	88	88	88	100	100	100	83	83	83	89	89	89
Benning Road and Minnesota Avenue	120	100	56	56	76	76	59	81	81	81	103	64	64

Benning Road and Bridges Transportation Improvements Final Environmental Assessment
 Appendix J – Air Quality Technical Memorandum

Intersection	Intersection Cycle Length (s)	RED TIMES FOR EACH MOVEMENT (s)											
		Northbound			Southbound			Westbound			Eastbound		
		LT	TH	RT	LT	TH	RT	LT	TH	RT	LT	TH	RT
BUILD (2040) PM CURB RUNNING													
Benning Road and E Capitol Street	120	101	101	101	88	88	88	97	97	97	74	74	74
Benning Road and Minnesota Avenue	120	107	66	66	79	79	42	91	91	91	83	54	54
BUILD (2040) AM MEDIAN RUNNING													
Benning Road and E Capitol Street	120	88	88	88	100	100	100	83	83	83	89	89	89
Benning Road and Minnesota Avenue	120	100	56	56	76	76	59	81	81	81	103	64	64
BUILD (2040) PM MEDIAN RUNNING													
Benning Road and E Capitol Street	120	101	101	101	88	88	88	97	97	97	74	74	74
Benning Road and Minnesota Avenue	120	107	66	66	79	79	42	91	91	91	83	54	54

Attachment B: CLRP & TIP Items

10/31/2014

CLRP Project Report

Home > Projects > CLRP Project Report

PROJECTS | ELEMENTS | PROCESS | PERFORMANCE | PARTICIPATION | FEDERAL REGULATIONS | DOCUMENTS

Home > Projects > CLRP Project Report

Request Change to 2014

Submitting Agency: DDOT

Secondary Agency: CLRP ID: 1669

Highways

Agency Project ID:

Traffic @ HOV

Project Name: Streetcar

Project Type: Transit

Bicycle & Pedestrian

Facility: Streetcar Project

From: Citywide

Selected Highlights

To:

Jurisdiction: District of Columbia

Six-Year TIP

Description: The streetcar system will consist of modern low-floor vehicles operating on surface tracks that are embedded in the street pavement. Currently, the District is planning to conduct additional planning and environmental review process for streetcar extensions as proposed in the District of Columbia Analysis DC Streetcar Phase 1 proposed network plan, that include: - Benning Road extension (Oklahoma Ave - Benning Road Metro Station) - MLK extension (Howard Road - 11th Street bridge) - Union Station to Mount Vernon Square - K Street Centerway In addition, the District hopes to begin construction soon after the planning and environmental process completion of the Benning Road extension.

ProposedSiteLocations_Apr082010_Map.pdf

Search the CLRP & TIP

show PROJECT PHASES TIP

show PROJECT PHASES CONFORMITY

Project Length: Project 2017 expected to be complete in: This project was completed in: This is an ongoing project and has no completion date:

Bicycle/Pedestrian Accommodations: No bicycle/pedestrian accommodations included

Cost: (\$1,000s) \$54,000

Congestion Management Information

Do traffic congestion conditions necessitate the proposed project?

If so, is the congestion recurring or non-recurring?

If the congestion is on another facility, please identify it: Is this a capacity-increasing project on a limited access highway or other principal arterial?

Project is exempt from the Congestion Management Process because:

SAFETEA-LU Planning Factors

planning factors that are addressed by this project:

Support the **economic vitality** of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency.

Increase the **safety** of the transportation system for all motorized and non-motorized users.

Is this project being proposed specifically to address a safety issue?
 If yes, briefly describe (in quantifiable terms, where possible) the nature of the safety problem:

Increase the ability of the transportation system to support **homeland security** and to safeguard the personal security of all motorized and non-motorized users.

Increase **accessibility and mobility** of people and freight.

Protect and enhance the **environment**, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns.

Enhance the **integration and connectivity** of the transportation system, across and between modes, for people and freight.

Promote efficient system **management and operation**.

Emphasize the **preservation** of the existing transportation system.

Environmental Mitigation

Have any potential mitigation activities been identified for this project?
 If yes, what types of mitigation activities have been identified?

http://www.mwcoog.org/clrp/projects/clrp-report.asp?PROJECT_ID=1669

9/11/2014

DRAFT FOR PUBLIC COMMENT

**DISTRICT OF COLUMBIA
 TRANSPORTATION IMPROVEMENT PROGRAM
 CAPITAL COSTS (in \$1,000)**

FY 2015 - 2020

Source	Fed/St/Loc	Previous Funding	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	Source Total
DC Circulator - National Mall Area Route									
TIP ID: 6104 Agency ID: Title: DC Circulator - National Mall Area Route			Complete:		Total Cost:		\$34,500		
Facility:	DC	0/100/0	9,800 e	10,500 e	7,100 e	7,100 e			34,500
From:									
To:									Total Funds: 34,500

Description: This area would be served either by two separate routes, or one route. Analysis has been done on both.

DC Circulator New Buses for Replacement and Expansion									
TIP ID: 6105 Agency ID: Title: DC Circulator New Buses for Replacement and Expansion			Complete:		Total Cost:		\$8,525		
Facility:	DC	0/100/0	21,539 e	4,200 e					4,200
From:									
To:									Total Funds: 4,200

Description: Additional Circulator buses must be purchased in order to expand service to additional routes.

DC Circulator Expansion - Phase I									
TIP ID: 6103 Agency ID: Title: DC Circulator Expansion - Phase I			Complete:		Total Cost:		\$62,593		
Facility:	DC	0/100/0	1,576 e	15,091 e	15,450 e	15,828 e	16,224 e		62,593
From:									
To:									Total Funds: 62,593

Description: Implement the Phase I DC Circulator routes as identified in the DC Circulator 10-Year Transit Development Plan

M Street SE/SW Premium Transit Environmental Work									
TIP ID: 6112 Agency ID: Temp02 Title: M Street SE/SW Streetcar			Complete:		Total Cost:		\$128,250		
Facility:	DC	0/100/0	2,500 a	3,750 a		20,750 c	43,750 c	57,500 c	125,750
From:									
To:									Total Funds: 125,750

Description: This funding will implement the environmental study work for the M Street SE/SW corridor

Streetcar									
TIP ID: 5754 Agency ID: CM080A Title: Benning Road Extension			Complete:		Total Cost:		\$82,750		
Facility: Streetcar Line	CMAQ	80/20/0	3,200 a						
From:	DC	0/100/0	2,000 a	7,250 c	15,750 c	28,500 c	29,250 c		80,750
To:									Total Funds: 80,750

Description: The Benning Road Streetcar Extension is a 1.95-mile surface fixed guide way transit line that includes electrically powered streetcar vehicles operating along tracks located within the existing street and travel lanes. The NEPA study will address potential impacts of the project, as well as, preliminary engineering (conceptual) for the line.

Transit DDOT - Bicycle/Pedestrian Accommodations Included a - PE b - ROW Acquisition c - Construction d - Study e - Other D - 22

BENNING ROAD & BRIDGES TRANSPORTATION IMPROVEMENTS

AGENCY CORRESPONDENCE

FINAL NOVEMBER 2020



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TABLE OF CONTENTS

DDOT Functional Reclassification Request to FHWA <i>February 05, 2013</i>	K-01
FHWA Reclassification Approval <i>April 18, 2013</i>	K-11
DDHC Response Letter <i>March 11, 2014</i>	K-17
DDOT-DOI Project Initiation Letter <i>May 4, 2014</i>	K-19
DDOT-FTA Project Initiation Letter <i>May 4, 2014</i>	K-23
DDOT-NCPC Project Initiation Letter <i>May 4, 2014</i>	K-27
DDOT 106 Process Initiation Letter to DC SHPO <i>February 18, 2014</i>	K-31
DC SHPO Process Initiation Response Letter <i>March 25, 2014</i>	K-35
DC SHPO Response Letter <i>August 20, 2014</i>	K-37
DC SHPO Determination of Eligibility Response Letter <i>April 08, 2015</i>	K-55
FHWA Consulting Parties Request Letter <i>July 27, 2015</i>	K-57
FHWA Sect. 106 Effects Determination Letter <i>December 04, 2019</i>	K-59
DC SHPO Sect. 106 Effects Concurrence Letter <i>December 05, 2019</i>	K-63
FHWA Letter to DOI on Section 4(f) <i>September 21, 2017</i>	K-64
DOI Section 4(f) Concurrence Letter <i>November 9, 2017</i>	K-67
DOEE Section 4(f) Concurrence Letter <i>September 18, 2020</i>	K-69
FTA Cooperating Agency Input Opportunity Letter <i>October 23, 2020</i>	K-71

NCPC Cooperating Agency Input Opportunity Letter K-73
October 23, 2020

NPS Cooperating Agency Input Opportunity Letter K-75
October 23, 2020

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF TRANSPORTATION



05 February, 2013

Joseph C. Lawson
District of Columbia Division Administrator
Federal Highway Administration
1990 K Street, NW, Suite 510
Washington, DC 20006-1103

RE: Request for Making H Street, NE and Benning Road, NE ROW Available for Mass Transit

Dear Mr. Lawson:

Pursuant to the direction provided in your letter sent to the District Department of Transportation (DDOT) dated May 17, 2012 regarding H Street/Benning Road and the issues regarding the Functional Classification of the street facilities to include mass transit “Making Highway ROW Available for Mass Transit Projects”, DDOT is making the formal request to FHWA to re-classify the functional classification of the street facilities on *H Street, NE and Benning Road, NE from North Capitol Street to Minnesota Ave, NE* to include transit mode on these facilities pursuant to 23 CFR 810 (c) “Making Highway ROW Available for Mass Transit”. DDOT has determined that the construction and operation of mass transit (including streetcar system) will not impair future highway improvements or the safety of the highway users. DDOT envisions the mass transit (including streetcar system) will provide an alternate transportation mode for local trips, thereby reducing congestion on the surface street system and providing capacity relief on the overcrowded heavy rail system.

In order to comply with the requirements of NEPA, DDOT has also prepared a Cat Ex document for this FHWA action. According to the FHWA regulation 23 CFR 771, the street re-classification action is a Categorical Exclusion that meets the requirements of 23 CFR 771.117 (c)

“actions meet the criteria for CEs in the CEQ regulation (Section 1508.4) and Sec. 771.117(a) of this regulation and normally do not require any further NEPA approvals by the Administration”.

Therefore, in accordance with 23 CFR 771.117 (c) and FHWA-DDOT *Programmatic Agreement for Review and Approval of Categorical Exclusions*, DDOT has prepared a Categorical Exclusion Document (CE Level I) that is enclosed with this letter (Attachment B). We have determined that pursuant to the requirements of the NEPA (42 USC 4321-4347), CEQ NEPA implementation regulations (40 CFR 1500-1508), FHWA Environmental Impacts and Related Procedures (23 CFR 771) this project (and action) does not individually or cumulatively have a significant environmental effect and is excluded from the requirements of preparing an Environmental Assessment (EA) or Environmental Impact Statement (EIS) and meets the requirements of 23 CFR 771.117. Hence the preparation of an EA or EIS is not required for this project.

We appreciate FHWA's cooperation in DDOT's programs and look forward to receiving FHWA approval for this request. Please feel free to contact me if you have any questions.

Sincerely,

Terry Bellamy
Director

Enclosure:

Attachment A: H Street and Benning Road Reclassification Map
Attachment B: H Street and Benning Road Reclassification Cat Ex I document
Attachment C: FHWA May 17, 2012 Letter Regarding H Street/Benning Road

CC:

Ronaldo T. Nicholson, DDOT; Carl Jackson, DDOT; Faisal Hameed, DDOT; Lezlie Rupert, DDOT; Michael Hicks, FHWA; Sandra Jackson, FHWA; Ken Dymond, FHWA; Robert Mooney, FHWA; Brian Glenn, FTA; Brigid Hynes-Cherin, FTA; Melissa Barlow, FTA; Daniel Koenig, FTA

Request for Making Highway ROW Available for Mass Transit Projects on H Street NE and Benning Rd NE Map



LEGEND:
 H Street NE: -----
 Benning Rd NE: -----

District Department of Transportation																							
Project Development & Environmental Evaluation Form (Form I)																							
New Form:			X			Revised Form:																	
1. Project Name (& Number):																							
Street Reclassification to make H Street / Benning Road, from North Capitol Street to Minnesota, NE ROW available for Mass Transit projects pursuant to 23 CFR 810 subpart C.																							
2. TIP ID number & Year (Required):																							
Great Streets (2009 TIP, #3294, 2912);																							
3. Previous Related Work (if any):																							
Title of the Previous Planning Study/Work:			H Street, 3 – 14 th ; Benning, 14 th – Oklahoma; H Street AA																				
Completion Year/time:																							
Study Completed by (Name of Agency):			DDOT; WMATA																				
4. Project Location (Please attach a map of the project area)																							
Roadway/Street Name		H Street / Benning Road, from North Capitol Street to Minnesota, NE				Functional Classification		Principal Arterial															
5. Funding Type (Place " X" where applies) :																							
Federal		X		Local				Other															
6. Purpose of the Project:																							
The purpose of the project is to reclassify H Street / Benning Road, from North Capitol Street to Minnesota, NE ROW and make it available for Mass Transit projects pursuant to 23 CFR 810 subpart C.																							
7. Need of the Project (Place " X" where applicable):																							
Safety		System Linkage		Pavement condition		Operational improvement		Community need		Congestion Relief													
Bicycle /Pedestrian		Environmental		Utility Relocation		Roadway Deficiency		Structural condition		Transportation Demand													
								ADA		Geometric Conditions													
										Planning Needs X													
										Other (transit) X													
8. Project Description:																							
This program action is being taken for Street Reclassification to make H Street / Benning Road, from North Capitol Street to Minnesota, NE ROW available for Mass Transit projects pursuant to 23 CFR 810 subpart C. The street function classification will continue to be principal arterial and is not being changed. This program action is only to make the ROW available for mass transit (streetcar) use. As the State Highway Agency and the owner of the H / Benning ROW pursuant 23 CFR 810.206, DDOT will continue to own the ROW being made available for transit use.																							
9. Estimated Cost of the Project:																							
TOTAL :			PLANNING:			NEPA:			DESIGN:			CONSTRUCTION:											
\$0			\$			\$			\$			\$											
10. Project Type/Phase (Place " X" where applicable):																							
Administrative X		Planning		Environment		Final Design		Construction		Maintenance													
If an administrative project/action please skip section 10-16.																							
11. Limits of Proposed Work:																							
North		H Street / Benning Road		South		H Street / Benning Road		East		Minnesota Ave, NE		West		1 st Street NE									
12. Schedule of the Project (identify month & year):																							
Planning		start		Finish		Environment		start		Finish		Design		start		Finish		Construction		start		Finish	
																						8/10	
13. Traffic Data (not required for administrative, resurfacing, or maintenance projects) :																							
Traffic			Year			ADT			LOS & Delay			Operating Speed			Crashes								
Existing																							

Build Year (opening year)				
Design Year (20-25 years)				
14. Roadway Conditions (not required for administrative projects/actions):				
	General Purpose	Parking	Bicycle	Bus/Transit Only
Existing Number of Lanes				
Proposed Number of Lanes				
Existing Pavement condition (PCI)				
15. Project Information:		Yes	No	Comment
A. Facility on new location or re-alignment				
B. Addition of Traffic Lanes				
C. Removal of Traffic Lanes				
D. Permanent change in traffic pattern or LOS				
E. Roadway construction or reconstruction				
F. Roadway resurfacing				
G. Bridge construction				
H. Bridge reconstruction or rehabilitation				
I. Removal of Parking				
J. Removal of vegetation or Trees				
K. Work outside the DDOT ROW (including air rights)				
L. ROW Acquisition (including easement, lease, air rights etc)				
M. Relocation of Businesses (temporary or permanent)				
N. Relocation of residences (temporary or permanent)				
O. Change in Access				
P. Change in Access on Interstate/Freeway (including major ramp reconfiguration)				
Q. Work on an Interstate or Freeway?				
R. Work over or under CSX, Amtrak, or railroad tracks (or air rights)				
S. Map of the project area attached (required)				
16. Public and Agency Coordination				
A. Were other DDOT administrations involved?				
B. Was general public involved (please describe how)?				
C. Were other agencies (FHWA, SHPO, NPS etc) involved?				
D. Was a Public Involvement Plan prepared?				
17. Resources				
A. Does the project address intermodal transportation needs (bike/transit/pedestrians)?				
B. Does the project impact land use/planned growth?				
C. Sec 4f & sec 6f Impacts: Does the project require work in a Park, Recreation area, or wildlife area?				
D. Sec 4f & sec 106 impacts: Does the project require work in a historic/archeological site, district, area, or street?				
E. CWA Sec 404: Does the project require work within a water body (river, wetland, stream, etc)?				
F. CWA Sec 402: Does the project require discharge of water or material directly into a river, wetland, or stream, etc?				
G. Sec 10: Does the project over a navigation channel?				
H. Does the project require work in hazardous waste site?				
I. ESA Sec 7: Does the project impact habitat (fish/animal/plant)?				
J. Have the Soil and Erosion plans been developed?				
K. Has Storm water Management plan been developed?				
L. Does the project result in permanent noise level increase?				

M. Is there any known controversy about the project?			
N. Does the project permanently affect the travel pattern?			
O. Does the Project have any environmental features? (describe)			
P. Does the Project increase usable open/green space? (describe)			
Q. Does the Project reduce emissions (water, air, wastes)? (describe)			
R. Does the Project reduce Greenhouse Gas Emissions?(describe)			
S. Does the Project use recycled/reused materials?(describe)			
T. Any other environmentally beneficial feature of the project?			
18. Other Comments (use additional pages if needed):			
Additional documentation is attached.			
19. Prepared by (Project Manager):		Phone:	Date:
NAME: Ali Shakeri			
ADMINISTRATION: IPMA			
PLEASE DO NOT COMPLETE BELOW. TO BE COMPLETED BY DDOT ENVIRONMENTAL STAFF.			
20. NEPA APPROVAL/DOCUMENTATION:			
X	Categorical Exclusion, Level 1 – The proposed action meets the criteria for CE-1level, per FHWA-DDOT CE PA. No further environmental documentation required.		
	Categorical Exclusion, Level 2 – The proposed action meets the criteria for CE-2 level, per FHWA-DDOT CE PA. Additional documentation needed. Form II to be prepared.		
	Categorical Exclusion, Level 3 – The proposed action meets the criteria for CE-3 level per the FHWA-DDOT CE PA. Additional documentation needed. CE III document to be prepared.		
	EA – An Environmental Assessment is to be prepared.		
	EIS – An Environmental Impact Statement is to be prepared.		
21. DCEPA APPROVAL/DOCUMENTATION:			
X	EXEMPT: (a) A federal action where a NEPA Action (Cat Ex, EA, EIS) been taken (Ref: DCMR 7202.1(b)) b) Planning or Feasibility Study or Preliminary Engineering (Ref: DCMR 7202.1(c)) c) Operation, repair, maintenance of existing public structures(Ref: DCMR 7202.2(a)) d) Replacement, renovation, or reconstruction of existing structures (Ref: DCMR 7202.2(b))		
	EISF		
	EIS		
22: COMMENTS/ADDITIONAL REVIEWS:			

Recommended by: Lezlie Rupert 6/27/12
DDOT Environmental Staff Date

Faisal

Approved by: Faisal Hameed 6/27/12
DDOT Project Development & Environment Division Head Date



U.S. Department
of Transportation
**Federal Highway
Administration**

District of Columbia Division
(202) 219-3570 FAX 219-3545

1990 K Street, NW
Suite 510
Washington, DC 20006-1103

May 17, 2012

In Reply Refer To: HDA-DC

Mr. Terry Bellamy
Director, District Department of Transportation
55 M Street, S.E., Suite 400
Washington, DC 20003

Dear Mr. Bellamy:

The District of Columbia has publicly announced plans to operate the H Street/Benning Road Streetcar Line by the summer of 2013 and to procure two additional streetcars from Oregon Iron Works, which will increase the city's streetcar inventory to five. These activities, along with ongoing public meetings concerning the re-introduction of streetcars to the District, presents a good opportunity to provide guidance that will assist the District Department of Transportation's (DDOT) efforts to implement a Streetcar line that incorporates the existing segment of fixed rail on Benning Road, NE. Accordingly, the successful implementation of the proposed "One City Line" will require the following actions to be taken by DDOT:

1. On September 19, 2007, the District of Columbia Division, Federal Highway Administration (DC FHWA) issued a Concurrence-in-Award for the Reconstruction of Benning Road, NE, from 14th Street to Oklahoma Avenue, Federal-aid Project (FAP) number STP-1116(026). During the construction of this Federal-aid contract, DDOT issued a separate contract using local funding to place fixed rail within the Federal-aid project limits concurrent with the reconstruction project. This DDOT action effectively changed the scope of the Federal-aid project, without the required FHWA approval, necessitating a re-evaluation of the Categorical Exclusion (CE) class of National Environmental Policy Act (NEPA) documentation approved for the project. Therefore, since DDOT introduced intent to implement Streetcars, DDOT is required to re-evaluate the project to determine how the introduction of street cars affects the environment as well as the assumptions and conclusions documented in the previous NEPA analysis.

Under 23 CFR 771.129(c), "after approval of the Environmental Impact Statement (EIS), Finding of No Significant Impact (FONSI), or CE designation, the applicant shall consult with the Administration prior to requesting any major approvals or grants to establish whether or not the approved environmental document or CE designation remains valid for the requested Administration action. These consultations will be documented when determined necessary by the Administration." During this consultation, FHWA will determine if the previous NEPA decision and documentation remain valid or if additional analysis is required. FHWA and the highway agency will also discuss changes to laws and

regulations that have gone into effect after the NEPA decision, along with any changes in the project design, scope, location and the affected environment. Any change to the proposed project such as: new circumstances; new information (environmental, traffic, standards, etc.); final design or scope modifications; or new or revised environmental laws, regulations, and/or policies which have occurred since the CE, FONSI or EIS/ROD was signed, are to be considered and discussed. Re-evaluations are required by FHWA regulations (23 CFR 771.129), and have been upheld in court as an appropriate mechanism for determining the validity of previous NEPA documents, decisions, or determinations.

2. Since the Benning Road reconstruction project was classified as a CE, it is reasonable to assume a re-evaluation could result in a determination that an Environmental Assessment (EA) would be required to determine the significance of impacts associated with the implementation of rolling stock in the Federal-aid highway right-of-way. Because the installation of a segment of fixed rail has taken place using local funding, the determination of the assumed EA would provide guidelines governing future fixed rail installation within the corridor and future implementation of an operational Streetcar line (see next step). Future implementation of an operational Streetcar line would also require compliance with NEPA, regardless of the funding source. An EA would also require cooperation from the Federal Transit Administration (FTA) and include a discussion on "logical termini" and "segmentation".
3. The Functional Classification of the street facilities in question that are being proposed for a streetcar line would have to be revised to include a transit mode for that facility (*23 CFR Part 810, Subpart C – Making Highway Rights-of-Way Available for Mass Transit Projects*). This change must be submitted to FHWA for approval and the appropriate NEPA document would have to be developed to determine the impact of transit within a vehicular-street facility. This action must take place prior to operational implementation of a streetcar line. This requirement is applicable to all Federal-aid eligible roadways where streetcar is being proposed to operate, when operations are imminent.

The above are the general steps that need to be taken to implement an operational streetcar line incorporating the existing segment of fixed rail on Benning Road, NE. FTA and FHWA have jointly responded to DDOT in a letter dated March 21, 2012, which provided to DDOT response to several scenarios for Federal participation under various circumstances in the development and implementation of the proposed "One City Line". Please see the enclosed letter for more explicit guidance on the requirements and limits of Federal participation in a streetcar facility. If there are further questions, please contact Michael Hicks of my staff at (202) 219-3513 or by email at michael.hicks@dot.gov for clarification and guidance.

Sincerely,



Joseph C. Lawson
Division Administrator

Enclosure

Cc: Brian Glenn, FTA
Brigid Hynes-Cherin, (FTA)
Melissa Barlow, FTA
Daniel Koenig, FTA
Ronaldo T. Nicholson, DDOT
Circe Torruellas, DDOT
Faisal Hameed, DDOT
Sharon Vaughn-Fair, FHWA
Ken Dymond, FHWA
Lavinia Thomas, FHWA
Robert Mooney, FHWA
Sandra Jackson, FHWA
Edward Stephen, FHWA

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U.S. Department
of Transportation
**Federal Highway
Administration**

District of Columbia Division
(202) 219-3570 FAX 219-3545

1990 K Street, NW
Suite 510
Washington, DC 2006-1103

April 18, 2013

In Reply Refer To: HDA -DC

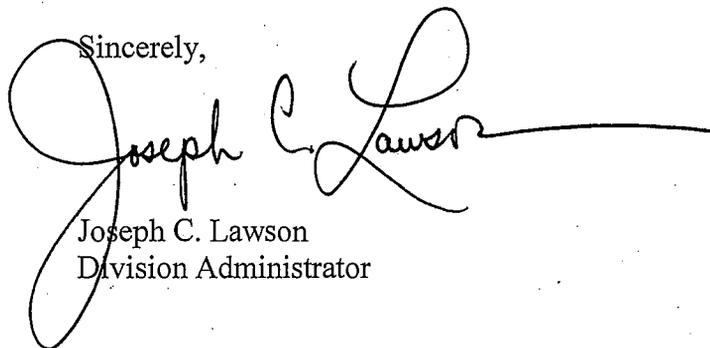
Mr. Terry Bellamy
Director, District Department of Transportation
55 M Street, SE, Suite 400
Washington, DC 20003

Dear Mr. Bellamy:

In response to your letter dated February 5, 2013 (enclosed), requesting that the H Street, NE, and Benning Road, NE, right-of-way be made available for mass transit, the Federal Highway Administration, District of Columbia Division (FHWA-DC) concurs with the findings of the District Department of Transportation (DDOT) Categorical Exclusion document (CE Level 1). The FHWA-DC staff specialist responsible for the program area covered under 23 CFR, Subpart C – Making Highway Rights-of-Way Available for Mass Transit Projects, will coordinate with the appropriate DDOT staff on the approval process required to implement this action.

If you have any questions, please contact Michael Hicks of my staff at (202) 219-3513 or Michael.hicks@dot.gov.

Sincerely,



Joseph C. Lawson
Division Administrator

Enclosure

Cc: Sharon Vaughn-Fair, FHWA
Ken Dymond, FHWA
Robert Mooney, FHWA
Eric Savage, FHWA
Sandra Jackson, FHWA
Brigid Hynes-Cherin, FTA
Brian Glenn, FTA
Melissa Barlow, FTA
Daniel Koenig, FTA
Ronaldo T. Nicholson, DDOT
Carl Jackson, DDOT
Faisal Hameed, DDOT
Lezlie Rupert, DDOT

RECEIVED
3/5/2013BY: *LM***GOVERNMENT OF THE DISTRICT OF COLUMBIA**
DEPARTMENT OF TRANSPORTATION

05-February, 2013

Joseph C. Lawson
District of Columbia Division Administrator
Federal Highway Administration
1990 K Street, NW, Suite 510
Washington, DC 20006-1103

RE: Request for Making H Street, NE and Benning Road, NE ROW Available for Mass Transit

Dear Mr. Lawson:

Pursuant to the direction provided in your letter sent to the District Department of Transportation (DDOT) dated May 17, 2012 regarding H Street/Benning Road and the issues regarding the Functional Classification of the street facilities to include mass transit "Making Highway ROW Available for Mass Transit Projects", DDOT is making the formal request to FHWA to re-classify the functional classification of the street facilities on *H Street, NE and Benning Road, NE from North Capitol Street to Minnesota Ave, NE* to include transit mode on these facilities pursuant to 23 CFR 810 (c) "Making Highway ROW Available for Mass Transit". DDOT has determined that the construction and operation of mass transit (including streetcar system) will not impair future highway improvements or the safety of the highway users. DDOT envisions the mass transit (including streetcar system) will provide an alternate transportation mode for local trips, thereby reducing congestion on the surface street system and providing capacity relief on the overcrowded heavy rail system.

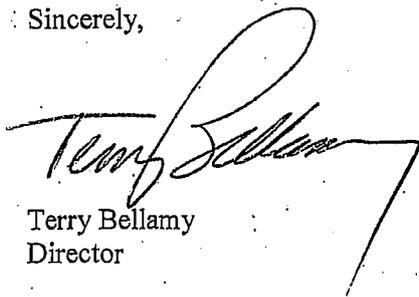
In order to comply with the requirements of NEPA, DDOT has also prepared a Cat Ex document for this FHWA action. According to the FHWA regulation 23 CFR 771, the street re-classification action is a Categorical Exclusion that meets the requirements of 23 CFR 771.117 (c)

"actions meet the criteria for CEs in the CEQ regulation (Section 1508.4) and Sec. 771.117(a) of this regulation and normally do not require any further NEPA approvals by the Administration".

Therefore, in accordance with 23 CFR 771.117 (c) and FHWA-DDOT *Programmatic Agreement for Review and Approval of Categorical Exclusions*, DDOT has prepared a Categorical Exclusion Document (CE Level I) that is enclosed with this letter (Attachment B). We have determined that pursuant to the requirements of the NEPA (42 USC 4321-4347), CEQ NEPA implementation regulations (40 CFR 1500-1508), FHWA Environmental Impacts and Related Procedures (23 CFR 771) this project (and action) does not individually or cumulatively have a significant environmental effect and is excluded from the requirements of preparing an Environmental Assessment (EA) or Environmental Impact Statement (EIS) and meets the requirements of 23 CFR 771.117. Hence the preparation of an EA or EIS is not required for this project.

We appreciate FHWA's cooperation in DDOT's programs and look forward to receiving FHWA approval for this request. Please feel free to contact me if you have any questions.

Sincerely,



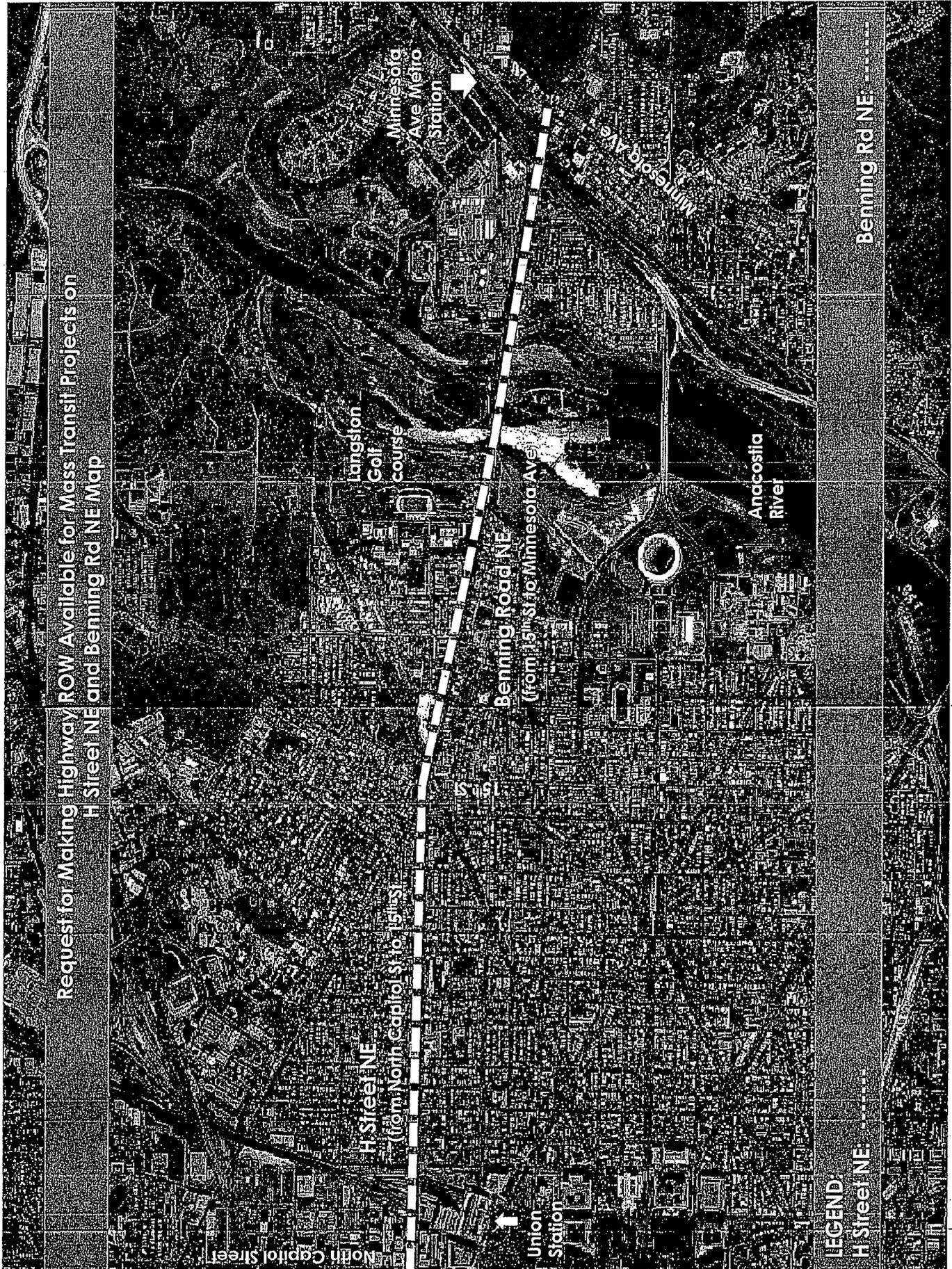
Terry Bellamy
Director

Enclosure:

Attachment A: H Street and Benning Road Reclassification Map
Attachment B: H Street and Benning Road Reclassification Cat Ex I document
Attachment C: FHWA May 17, 2012 Letter Regarding H Street/Benning Road

CC:

Ronaldo T. Nicholson, DDOT; Carl Jackson, DDOT; Faisal Hameed, DDOT; Lezlie Rupert, DDOT; Michael Hicks, FHWA; Sandra Jackson, FHWA; Ken Dymond, FHWA; Robert Mooney, FHWA; Brian Glenn, FTA; Brigid Hynes-Cherin, FTA; Melissa Barlow, FTA; Daniel Koenig, FTA



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Hachey, Alan

From: Walker, Paul K (DHCD) <paul.k.walker@dc.gov>
Sent: Tuesday, March 11, 2014 12:36 PM
To: Clarence.Dickerson@dc.gov; Kratzer, Karl
Cc: Anyaegbunam, Oke (DHCD)
Subject: Benning Rd and Bridge Transportation Improvements Environmental Assessment

Clarence and Karl

I have read and reviewed the DDOT attachment that was sent to Robert Trent, former Chief of Staff here at the Department of Housing and Community Development. At this time we have no issues, comments or suggestion regarding the assessment of the environment and cultural resources for this project. Thank you for your consideration in this matter.

Sincerely
Paul Walker
Architect
Development Finance Division
Department of Housing and Community Development

As you spring forward, check your smoke alarm. It may be time for a new one. The DC Fire and Emergency Medical Services Department provides free installations of smoke alarms for owner-occupied District homes. Request an installation at <http://311.dc.gov> or call 202-673-3331.

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GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF TRANSPORTATION



d. Infrastructure Project Management Administration

May 4, 2014

Peter May
Associate Regional Director - Land, Resources, and Planning
U.S. Department of Interior - NPS, National Capital Region
1100 Ohio Drive, SW
Washington, DC 20242

Subject: Invitation to become a Cooperating Agency on the Benning Road and Bridge
Transportation Improvements Project

Dear Mr. May:

The District Department of Transportation (DDOT) and the Federal Highway Administration (FHWA) are preparing an Environmental Assessment in accordance with the National Environmental Policy Act for transportation improvements on Benning Road, between 26th and East Capitol Streets NE, and on Minnesota Avenue, between the Benning Road intersection and the Minnesota Avenue Metrorail Station (see attached location map). The project will also include the assessment of historic resources in accordance with the Section 106 of the National Historic Preservation Act. The majority of proposed improvements would occur within the existing right-of-way and would address Safety, Roadway and Bridge conditions, Multi-modal Transportation Improvements, Transit needs, and pedestrian safety and access.

With this letter, we extend the National Park Service (NPS) an invitation to become a cooperating agency with FHWA in the development of the NEPA document for the Benning Road and Bridge Transportation Improvements project in accordance with 40 CFR 1501.6 of the Council on Environmental Quality's Regulations for Implementing the Procedural Provision of NEPA. Pursuant to Section 1305(c) of Moving Ahead for Progress in the 21st Century (MAP-21), cooperating agencies are responsible to carry out their obligations under applicable laws concurrently with the lead agency's environmental review process, unless doing so would impair their ability to conduct needed analysis or otherwise carry out those obligations; and for formulating and implementing administrative, policy, and procedural mechanisms to enable the agency to ensure completion of

the environmental review process in a timely, coordinated, and environmentally responsible manner. We suggest that your agency's role in the development of this project should include the following activities as they relate to your area of expertise:

1. Provide meaningful and early input on defining the project purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.
2. Participate in monthly coordination meetings and quarterly interdisciplinary team meetings, as appropriate.
3. Timely review and comment on the pre-draft and pre-final NEPA documents to reflect views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

Please provide a written response indicating NPS' acceptance or denial of this invitation no later than 30 days from the date of receipt of this letter. If you accept, please accept the appropriate contact person within your organization for future coordination. If your agency declines, the response should state the reason(s) for declining the invitation, specifically stating in the response that it:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project; and
- Does not intend to submit comments on the project.

If you have any questions or would like to discuss the project or our agencies' respective roles in more detail, please feel free to contact me at Clarence.Dickerson@dc.gov.

Sincerely,

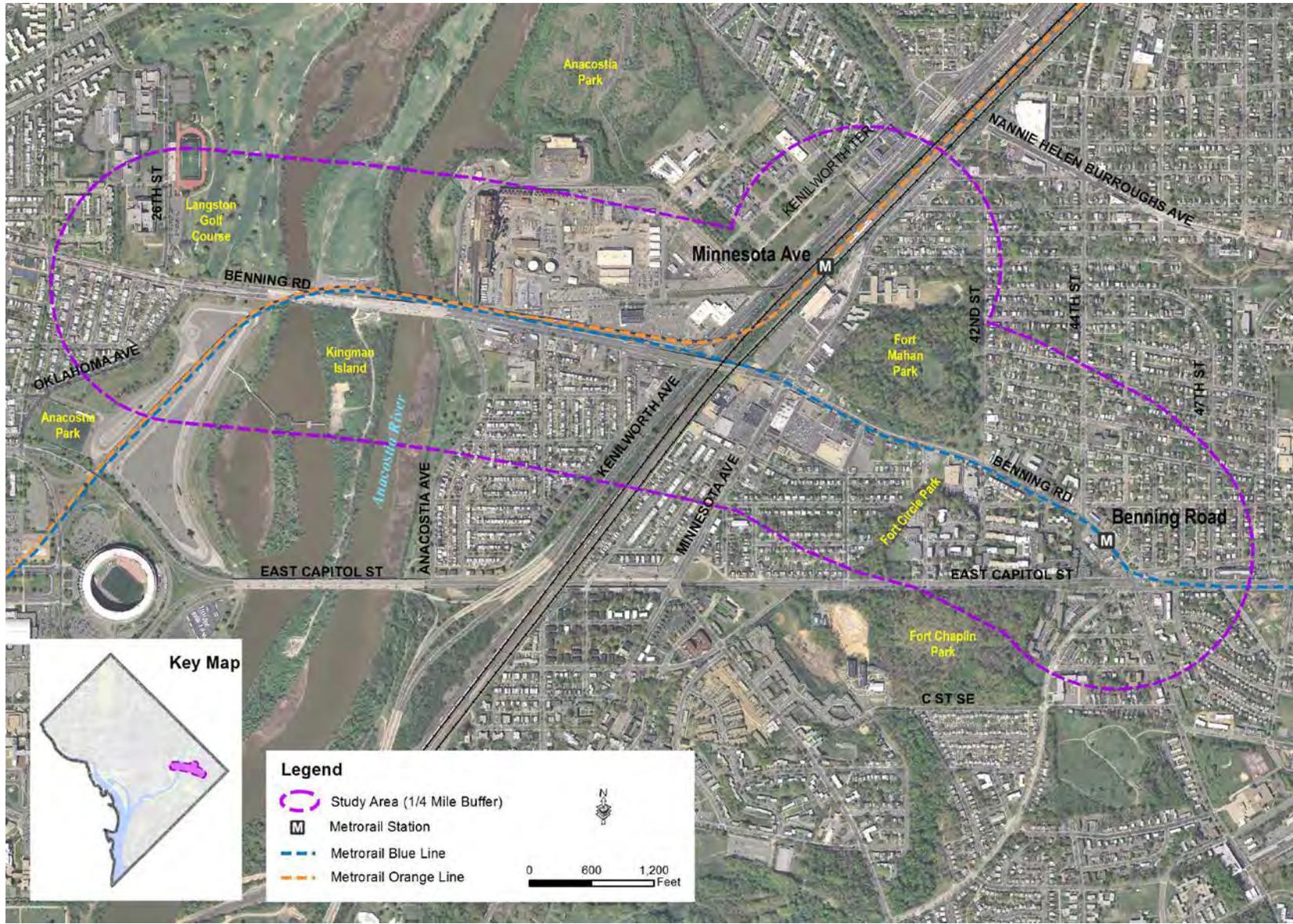


Clarence Dickerson

Project Manager, Benning Road and Bridge Transportation Improvements EA

cc: Michael Hicks (FHWA)
Faisal Hameed (DDOT)

Figure 1: Project Location Map



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GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF TRANSPORTATION



d. Infrastructure Project Management Administration

May 4, 2014

Daniel Koenig
Environmental Protection Specialist
Federal Transit Administration | DC Metro
1990 K Street, NW | Suite 510
Washington, DC 20006

Subject: Invitation to become a Cooperating Agency on the Benning Road and Bridge
Transportation Improvements Project

Dear Mr. Koenig:

The District Department of Transportation (DDOT) and the Federal Highway Administration (FHWA) are preparing an Environmental Assessment in accordance with the National Environmental Policy Act for transportation improvements on Benning Road, between 26th and East Capitol Streets NE, and on Minnesota Avenue, between the Benning Road intersection and the Minnesota Avenue Metrorail Station (see attached location map). The project will also include the assessment of historic resources in accordance with the Section 106 of the National Historic Preservation Act. The majority of proposed improvements would occur within the existing right-of-way and would address Safety, Roadway and Bridge conditions, Multi-modal Transportation Improvements, Transit needs, and pedestrian safety and access.

With this letter, we extend the National Park Service (NPS) an invitation to become a cooperating agency with FHWA in the development of the NEPA document for the Benning Road and Bridge Transportation Improvements project in accordance with 40 CFR 1501.6 of the Council on Environmental Quality's Regulations for Implementing the Procedural Provision of NEPA. Pursuant to Section 1305(c) of Moving Ahead for Progress in the 21st Century (MAP-21), cooperating agencies are responsible to carry out their obligations under applicable laws concurrently with the lead agency's environmental review process, unless doing so would impair their ability to conduct needed analysis or otherwise carry out those obligations; and for formulating and implementing administrative, policy, and procedural mechanisms to enable the agency to ensure completion of the environmental review process in a timely, coordinated, and environmentally responsible

manner. We suggest that your agency's role in the development of this project should include the following activities as they relate to your area of expertise:

7. Provide meaningful and early input on defining the project purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.
8. Participate in monthly coordination meetings and quarterly interdisciplinary team meetings, as appropriate.
9. Timely review and comment on the pre-draft and pre-final NEPA documents to reflect views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

Please provide a written response indicating NPS' acceptance or denial of this invitation no later than 30 days from the date of receipt of this letter. If you accept, please accept the appropriate contact person within your organization for future coordination. If your agency declines, the response should state the reason(s) for declining the invitation, specifically stating in the response that it:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project; and
- Does not intend to submit comments on the project.

If you have any questions or would like to discuss the project or our agencies' respective roles in more detail, please feel free to contact me at Clarence.Dickerson@dc.gov.

Sincerely,

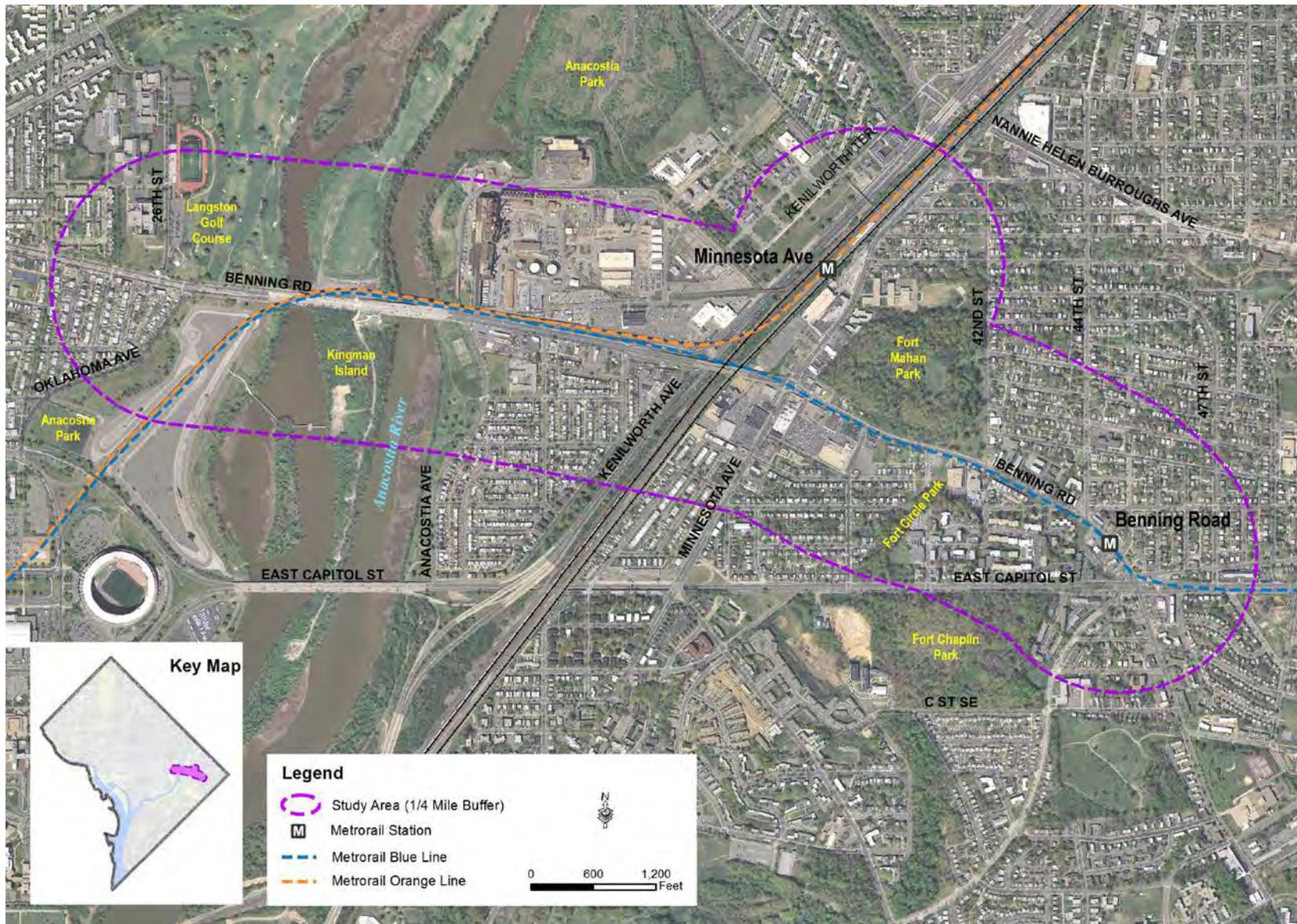


Clarence Dickerson

Project Manager, Benning Road and Bridge Transportation Improvements EA

cc: Michael Hicks (FHWA)
Melissa Barlow (FTA)
Faisal Hameed (DDOT)

Figure 1: Project Location Map



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GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF TRANSPORTATION



d. Infrastructure Project Management Administration

May 4, 2014

Marcel Acosta
Executive Director
National Capital Planning Commission
401 9th Street, NW, Suite 500
Washington, DC 20004

Subject: Invitation to become a Cooperating Agency on the Benning Road and Bridge
Transportation Improvements Project

Dear Mr. Acosta:

The District Department of Transportation (DDOT) and the Federal Highway Administration (FHWA) are preparing an Environmental Assessment in accordance with the National Environmental Policy Act for transportation improvements on Benning Road, between 26th and East Capitol Streets NE, and on Minnesota Avenue, between the Benning Road intersection and the Minnesota Avenue Metrorail Station (see attached location map). The project will also include the assessment of historic resources in accordance with the Section 106 of the National Historic Preservation Act. The majority of proposed improvements would occur within the existing right-of-way and would address Safety, Roadway and Bridge conditions, Multi-modal Transportation Improvements, Transit needs, and pedestrian safety and access.

With this letter, we extend the National Park Service (NPS) an invitation to become a cooperating agency with FHWA in the development of the NEPA document for the Benning Road and Bridge Transportation Improvements project in accordance with 40 CFR 1501.6 of the Council on Environmental Quality's Regulations for Implementing the Procedural Provision of NEPA. Pursuant to Section 1305(c) of Moving Ahead for Progress in the 21st Century (MAP-21), cooperating agencies are responsible to carry out their obligations under applicable laws concurrently with the lead agency's environmental review process, unless doing so would impair their ability to conduct needed analysis or otherwise carry out those obligations; and for formulating and implementing administrative, policy, and procedural mechanisms to enable the agency to ensure completion of

the environmental review process in a timely, coordinated, and environmentally responsible manner. We suggest that your agency's role in the development of this project should include the following activities as they relate to your area of expertise:

4. Provide meaningful and early input on defining the project purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternatives analysis.
5. Participate in monthly coordination meetings and quarterly interdisciplinary team meetings, as appropriate.
6. Timely review and comment on the pre-draft and pre-final NEPA documents to reflect views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.

Please provide a written response indicating NPS' acceptance or denial of this invitation no later than 30 days from the date of receipt of this letter. If you accept, please accept the appropriate contact person within your organization for future coordination. If your agency declines, the response should state the reason(s) for declining the invitation, specifically stating in the response that it:

- Has no jurisdiction or authority with respect to the project;
- Has no expertise or information relevant to the project; and
- Does not intend to submit comments on the project.

If you have any questions or would like to discuss the project or our agencies' respective roles in more detail, please feel free to contact me at Clarence.Dickerson@dc.gov.

Sincerely,

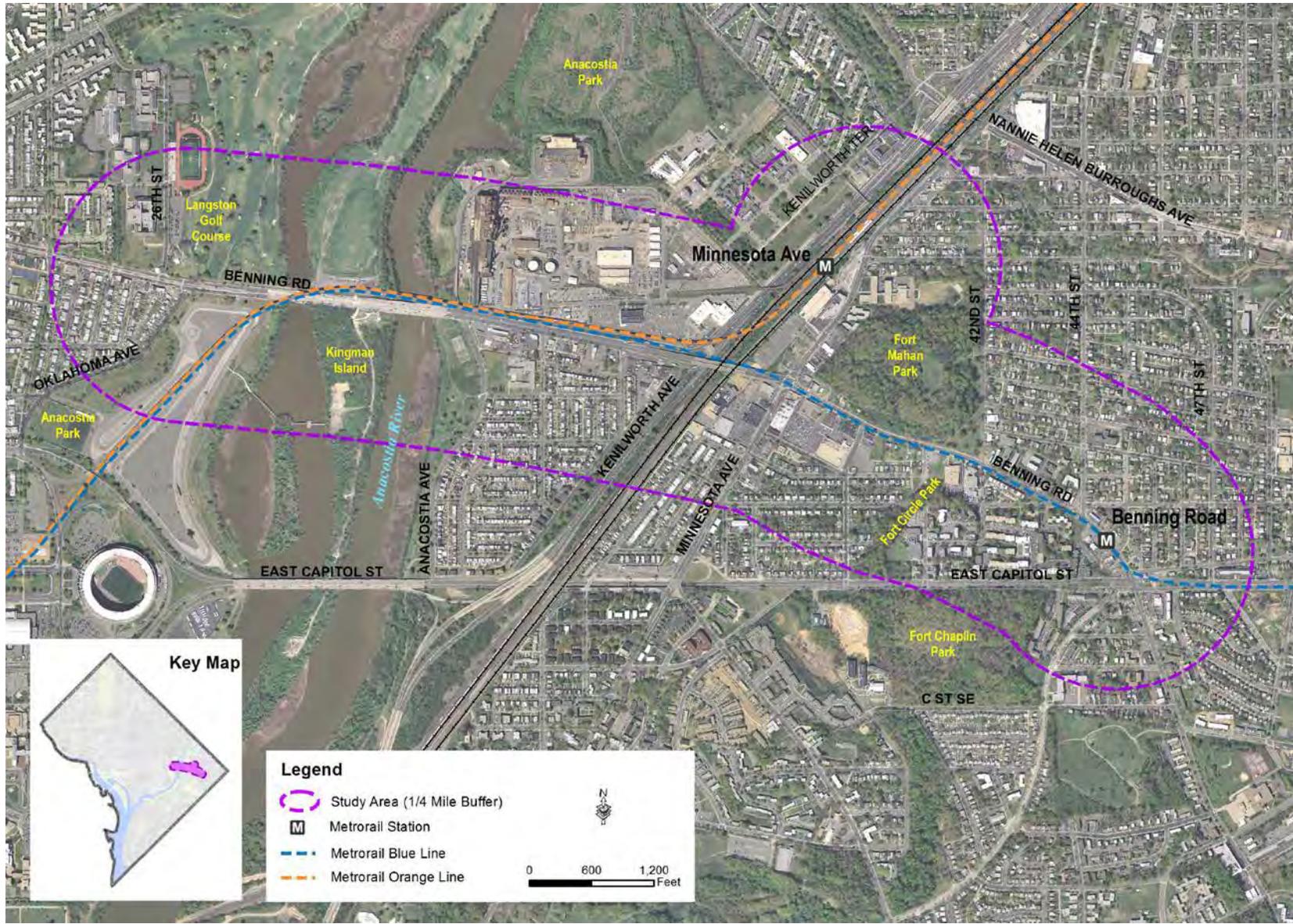


Clarence Dickerson

Project Manager, Benning Road and Bridge Transportation Improvements EA

cc: Christine Saum (NCPC)
Elizabeth Miller (NCPC)
Michael Hicks (FHWA)
Faisal Hameed (DDOT)

Figure 1: Project Location Map



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GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF TRANSPORTATION



d. Infrastructure Project Management Administration

February 18, 2014

Mr. David Maloney
District of Columbia State Historic Preservation Office
1100 4th Street, SW
Suite E650
Washington, DC 20024

Subject: Benning Road and Bridge Transportation Improvements Environmental Assessment
and Section 106 Evaluation

Dear Mr. Maloney:

The District Department of Transportation (DDOT), in cooperation with the Federal Highway Administration (FHWA) is preparing an Environmental Assessment (EA) for the Benning Road and Bridge Transportation Improvements Project in accordance with the National Environmental Policy Act (NEPA). The project will also consider effects to historic properties in accordance with the requirements of Section 106 of the National Historic Preservation Act (16 USC §470) and its implementing regulations (36 CFR Part 800). The purpose of this letter is to initiate Section 106 consultation for the Benning Road and Bridge Transportation Improvements Project.

The Benning Road and Bridge Transportation Improvements Project is located in Northeast Washington, DC. The project area extends from the intersection of Benning Road and Oklahoma Avenue to the Minnesota Avenue and Benning Road Metrorail Stations (see attached location map). The majority of proposed improvements would occur within the existing right-of-way and would address Safety, Roadway and Bridge conditions, Multi-modal Transportation Improvements, Transit needs, and pedestrian safety and access. The agency scoping meeting for the project will be held on Tuesday March 4, 2014 at 9:00 am at DDOT Office, Conference Room 439, 55 M St, SE, Washington DC 20003 as part of the monthly DDOT Interagency meeting.

We will contact you shortly to set up meetings to discuss this project. Please contact me if you have additional questions or comments. Thank you very much, and we look forward to working with you on this project.

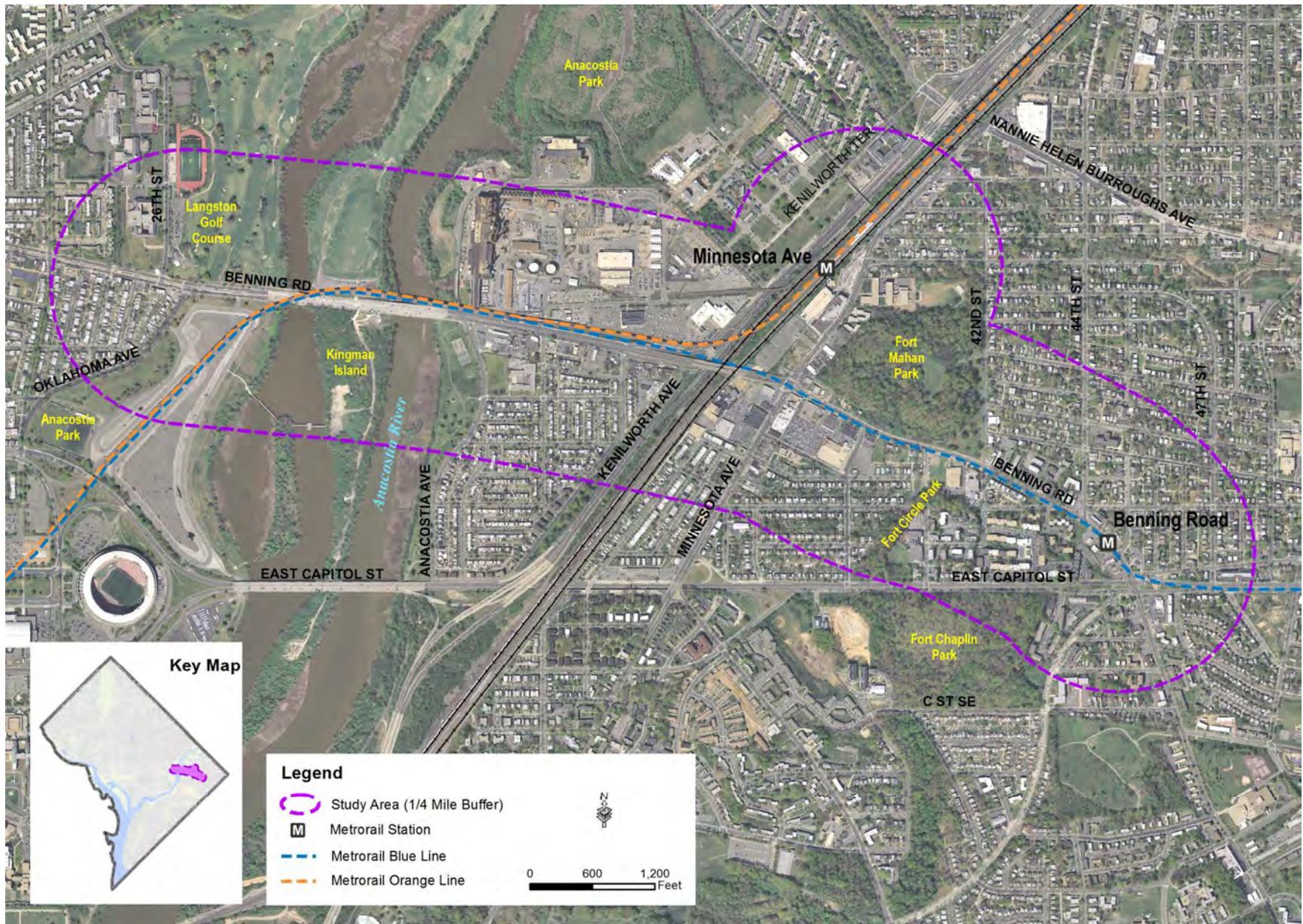
Sincerely,



Clarence Dickerson
Project Manager,
202-671-4586

Cc: Faisal Hameed, DDOT
Mike Hicks, FHWA
Daniel Koenig, FTA
Andrew Lewis, DC SHPO
Jennifer Hirsh, NCPC
David Hayes, NPS
Carol Legard, ACHP

Figure 1: Project Location Map



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March 25, 2014

Mr. Clarence Dickerson
 Project Manager
 District Department of Transportation
 Infrastructure Project Management Administration
 55 M Street, SE
 Suite 400
 Washington, DC 20003

RE: Initiation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

Dear Mr. Dickerson:

Thank you for initiating consultation with the DC State Historic Preservation Office (SHPO) regarding the above-referenced undertaking which we understand is to be carried out with assistance from the Federal Highway Administration and the Federal Transit Administration. We are writing in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800, to provide our initial comments regarding effects on historic properties.

Based upon a review of your submittal and recent discussions with DDOT staff, we understand that the project will involve a variety of transportation-related improvements designed to facilitate an extension of the forthcoming “One City Streetcar Line” from the intersection of 26th Street and Benning Road, NE to locations near the Benning Road and/or Minnesota Avenue Metro Stations. Since the project is still in the early planning phases, a draft Area of Potential Effect (APE) has yet to be prepared but, by referring to the “Study Area” shown in the image to the right, we identified several known historic properties and several which we believe should be evaluated using our Determination of Eligibility Form in order to determine whether they are eligible for listing in the National Register of Historic Places. The known historic properties and those recommended for evaluation are listed on the following pages.



Mr. Clarence Dickerson

Initiation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

March 25, 2014

Page 2

The listed/eligible properties include:

1. The Langston Terrace Dwellings at 21st Street and Benning Road, NE
2. Spingarn High School at 2500 Benning Road, NE
3. The Brown, Phelps, and Young Schools just to the north of Spingarn
4. The Langston Golf Course
5. The Anacostia Park Historic District
6. The Senator Theater Entrance Pavilion at 3950 Minnesota Avenue, NE
7. Fort Circle Parks Historic District/Fort Mahan
8. Engine Company No. 27 at 4201 Minnesota Avenue, NE
9. Mayfair Mansions at Kenilworth Avenue, Jay and Hayes Streets, NE

The properties recommended for evaluation using a DOE Form include:

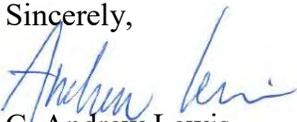
1. The Pepco Power Plant Complex at Benning Road
2. 3341 Benning Road, NE: a streamlined currently building known as the “Washington Insurance”
3. 3439 Benning Road, NE: a mid-1940s automobile-related shopping complex
4. 3445 Benning Road, NE: a substantially altered, but relatively early building
5. 4202 Benning Road, NE: potentially associated with late 19th century African-American Community/Designed by African-American architects
6. 4208 Benning Road, NE: Potentially associated with late 19th century African-American Community/Designed by African-American architects
7. 4248 Benning Road, NE: a building with some modest architectural detail
8. 4270 Benning Road, NE: “New Mount Calvary Baptist Church” may have been relocated from the east side of East Capitol and the former site of Payne’s Cemetery.
9. 4510 East Capitol Street, NE: the “Shrimp Boat” was constructed c. 1953 and already considered a “landmark” of sorts by the local community.

Please note that additional survey and/or DOEs may be recommended after we learn more about the scope of the project, review a draft APE, and consider the comments of the consulting parties.

Also note that, depending upon the extent and location of ground disturbing activities associated with the project, archaeological survey may be required in order to determine the potential for effects on archaeological resources.

We look forward to consulting further with all parties to continue the Section 106 review of this undertaking. If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841 (for historic built environment) or Ruth Trocolli at ruth.trocolli@dc.gov or 202-442-8836 (for archaeology). Otherwise, thank you for providing this initial opportunity to review and comment.

Sincerely,



C. Andrew Lewis

Senior Historic Preservation Specialist
DC State Historic Preservation Office

14-069



August 20, 2014

Mr. Clarence Dickerson
 Project Manager
 District Department of Transportation
 Infrastructure Project Management Administration
 55 M Street, SE
 Suite 400
 Washington, DC 20003

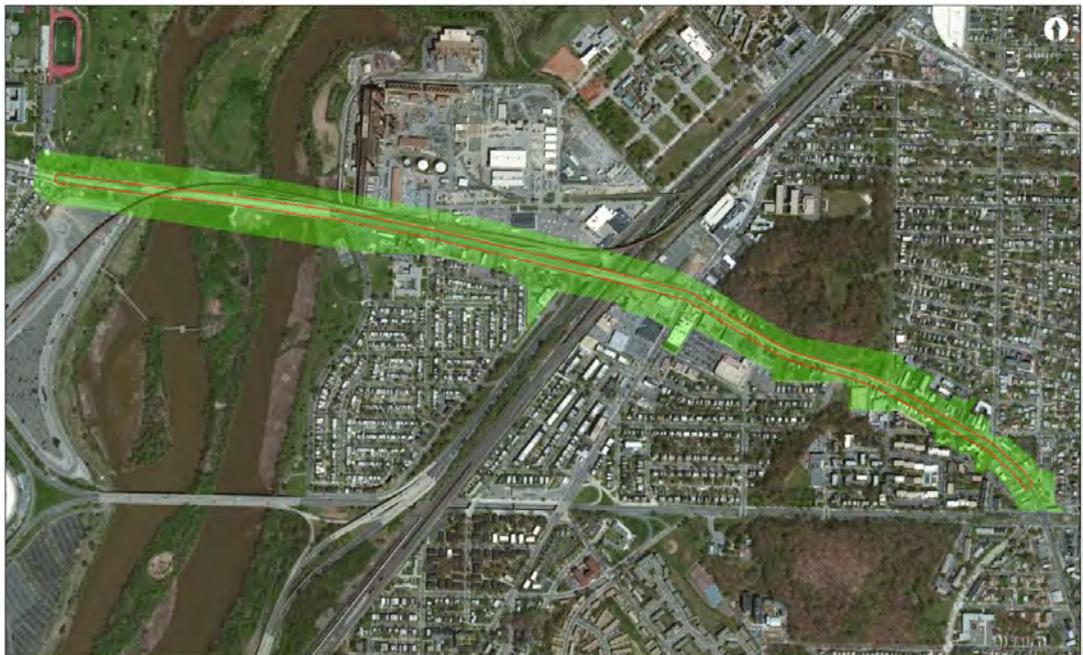
RE: Continuation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

Dear Mr. Dickerson:

Thank you for providing additional information about the above-referenced undertaking. Based upon our review of the supplemental documentation and the discussions held during our recent monthly meetings with DDOT, we are writing in accordance with Section 106 of the National Historic Preservation Act to provide further comments regarding the identification of, and potential effects on, historic properties.

We have reviewed the revised Area of Potential Effect (APE) for the project (shown in the image below) and concur that it should be generally sufficient to take into account the direct and indirect effects of the project, based upon the information we have reviewed to-date. However, we recommend that the schools along 26th Street, NE (i.e. Spingarn, Brown, Phelps and Young) be included in the APE since their location atop the hill provides an unobstructed view of the project area along Benning Road.

These properties have already been determined eligible for listing in the National Register of Historic Places as a historic district that has yet to be named. If necessary, the APE can be further revised at a later time to address other potential historic properties that may be affected by the project.



Mr. Clarence Dickerson

Continuation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

August 20, 2014

Page 2

As you may recall, the following properties were recommended for evaluation using a Determination of Eligibility (DOE) Form in our letter of March 25, 2014:

1. The Pepco Power Plant Complex at Benning Road
2. 3341 Benning Road, NE: a streamlined currently building known as the “Washington Insurance”
3. 3439 Benning Road, NE: a mid-1940s automobile-related shopping complex
4. 3445 Benning Road, NE: a substantially altered, but relatively early building
5. 4202 Benning Road, NE: potentially associated with late 19th century African-American Community/Designed by African-American architects
6. 4208 Benning Road, NE: Potentially associated with late 19th century African-American Community/Designed by African-American architects
7. 4248 Benning Road, NE: a building with some modest architectural detail
8. 4270 Benning Road, NE: “New Mount Calvary Baptist Church” may have been relocated from the east side of East Capitol and the former site of Payne’s Cemetery.
9. 4510 East Capitol Street, NE: the “Shrimp Boat” was constructed c. 1953 and already considered a “landmark” of sorts by the local community.

Since our initial letter, the project consultants have identified a number of other properties within the APE that are 50 years old or older and recommended for survey. Based upon our review of those properties, we offer the following comments:

10. Call boxes along Benning Road, NE: evaluate with a DOE.
11. 4001 Benning Road, NE: evaluate with a DOE.
12. 3399 Benning Road, NE: evaluate with a DOE.
13. 3621 Benning Road, NE: no need to evaluate with a DOE. No distinction or integrity.
- 14(a). Vicinity of 3700 Benning Road, NE: evaluate with a DOE.
- 14(b). 3703-05 Benning Road, NE: previously considered as part of DC Warehouse Survey. Not identified as eligible, but may have potential for significance based upon more in-depth research. Evaluate with a DOE.
15. 3917 Benning Road, NE: no need to evaluate with a DOE. No distinction or integrity.
16. 3919 Benning Road, NE: no need to evaluate with a DOE. Extensively altered. No integrity.
17. 3934 Benning Road, NE: no need to evaluate this particular residence.
18. 3938 Benning Road, NE: most likely the work of African-American Architect Lewis Giles (see attached partial bio). Evaluate with a DOE.
19. 3940 Benning Road, NE: most likely the work of African-American Architect Gus Bull (see attached partial bio). Evaluate with a DOE.
20. 3942 Benning Road, NE: no need to evaluate this particular residence.
21. 4035-4037 Benning Road, NE: no need to evaluate this particular residence.
22. 4049 Benning Road, NE: no need to evaluate this particular residence.
23. 4053 Benning Road, NE: most likely the work of African-American Architect Lewis Giles (see attached partial bio). Evaluate with a DOE.
24. 4057 Benning Road, NE: no need to evaluate this particular residence.
25. 4061 Benning Road, NE: no need to evaluate this particular residence.

Mr. Clarence Dickerson

Continuation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

August 20, 2014

Page 3

26. 4145 Benning Road, NE: previously determined unlikely to be eligible based on cursory review. Additional research would be beneficial. Evaluate with a DOE.
27. 4201-4243 Benning Road, NE: part of historically black community called "Capital View." Evaluate with a DOE.
28. 4228 Benning Road, NE: most likely the work of African-American Architect R. C. Archer (see attached partial bio). Evaluate with a DOE.
29. 4234 Benning Road, NE: most likely the work of African-American Architect Lewis Giles (see attached partial bio). Evaluate with a DOE.
30. 4236 Benning Road, NE: most likely the work of African-American Architect Cyril Bow (see attached partial bio). Evaluate with a DOE.
31. 4244 Benning Road, NE: no need to evaluate this particular residence.
32. 4246 Benning Road, NE: no need to evaluate this particular residence.
33. 4254 Benning Road, NE: most likely the work of African-American Architect Lewis Giles (see attached partial bio). Evaluate with a DOE.
34. 4256-4264 Benning Road, NE: evaluate with a DOE. May date to 1954 and fall outside the scope of "Apartment Buildings in Washington DC 1880-1945" Multiple Property Document.
35. 4280 Benning Road, NE: most likely the work of George T. Santmyers. Evaluate with a DOE. May date to 1942 and fall within the scope of "Apartment Buildings in Washington DC 1880-1945" Multiple Property Document.
36. 4280 Benning Road, NE: no need to evaluate this particular residence.
37. 4414 Benning Road, NE: previously determined ineligible. No longer extant.
38. 4430 Benning Road, NE: No longer extant.
39. 4212 East Capitol Street, NE: evaluate with a DOE.

We look forward to continuing consultation. To that end, some additional information about the above-referenced architects may be available in our files. We will be pleased to make this information available for purposes of completing the requested DOE Forms. And as for archaeology, much of the project area has not been surveyed. Please remember to begin identifying staging areas and other sites where ground disturbing activities may be anticipated outside of the existing streets. We will provide additional comments regarding the need for any archaeological survey after more specificity about project-related ground disturbance can be established.

If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841 (for historic built environment) or Ruth Troccoli at ruth.troccoli@dc.gov or 202-442-8836 (for archaeology). Otherwise, thank you for providing this additional opportunity to review and comment.

Sincerely,



C. Andrew Lewis

Senior Historic Preservation Specialist
DC State Historic Preservation Office

14-069

LEWIS WENTWORTH GILES, SR. (1894-1974)

Lewis Wentworth Giles was born in 1894 in Amelia County, in southside Virginia southwest of Richmond. Although Giles has been little studied, he appears to have been one of Washington's most prolific early 20th century African American architects. By 1908, Giles had moved to Washington where he attended Armstrong Technical School, graduating in 1913.¹ He attended the University of Illinois from 1914 to 1917² but was drafted into the army before he could graduate.³ He worked for African American architect Isaiah T. Hatton (see biography) from 1918 until Hatton's untimely death in 1921.⁴ Giles appears to have continued Hatton's practice from office space in the Pythian (True Reformer Building) at 12th and U Street, NW.⁵ In 1929, he moved his practice to his Deanwood residence at 4428 Hunt Place, NE, where he remained through 1950. Like a number of African American architects, Giles did not seek registration until 1950, when the law changed to require architectural registration for preparation of plans for buildings over 2 stories or 1000 sq. ft. Giles' son, Lewis Giles, Jr. (see biography), also went to the University of Illinois and became an architect. Lewis Giles, Sr. died in 1974.⁶

Sources: D.C. Board of Examiners and Registrars of Architects Case Files; D.C. City Directories; D.C. Engineer's Records for Isaiah T. Hatton; Lee, J.V. "Deanwood Historic Study: The Role of Black Architects in the Development of Deanwood;" Oral interview with Lewis Giles, Jr.

Illustrations: Material from Lewis Giles, Sr. scrapbook

Further work: Incorporate material from oral interview with Lewis Giles, Jr.
Incorporate material from Lewis Giles, Sr. scrapbook

BB: 10/16/95

GUS BULL

Gus Bull was listed as an architect in the 1936 City Directory. His residence was located at 2224 12th Place, N.W. In 1933, the Board of Architectural Registration noted that "the name G.N. Bull, Architect" was printed on Romulus Archer's letterhead and wrote Archer that "Mr. Bull is not entitled to any designation which would indicate or imply that he is an architect or a registered architect."¹ Bull designed houses in Deanwood.²

Sources: D.C. City Directories; D.C. Board of Examiners and Registrars of Architects Case File for Romulus Archer; Lee, J.V. "Deanwood Historic Study: The Role of Black Architects in the Development of Deanwood."

Illustration: None

BB: 10/9/95

ROMULUS C. ARCHER, JR. (1890-1968)

Romulus Cornelius Archer, Jr. was born in Norfolk, Virginia in 1890 and died in Washington, D.C. in 1968. Both his father and uncle were contractors in Virginia.¹ Archer worked as a carpenter before he became an architect.² He was the son of Romulus C. Archer, a contractor who was listed in the 1908 Norfolk City Directory as a plasterer.³ Archer attended Norfolk public schools, graduating from high school in June 1908. He enrolled in Norfolk Mission College for two terms (1908-1910) and in another school for three terms (1911-1913).⁴ He then attended Columbia University's School of Architecture for one year in 1913.⁵

In his application for registration, Archer stated that he began the practice of architecture in 1915.⁶ Archer joined the Army in 1916 and served as a bandsman in World War I.⁷ From June 1921 through November 15, 1921, Archer worked in the Supervising Architect's office in the U.S. Treasury Department. He opened his own office in Washington in December 1921, producing designs for churches, educational buildings, and small commercial structures. Archer was among the first African American architects to be registered in the District of Columbia. His registration number was 117, dated January 15, 1926. Archer's letterhead for that year listed "branches" in Norfolk and Durham.⁸

During World War II Archer worked as a drafting instructor for the government.⁹ In addition to his registration in the District, Archer was registered to practice architecture in Maryland, North Carolina, and Virginia. In 1954 he received the Washington Board of Trade Award for Superior Design and in 1964 the "Y" Men named him "Citizen of the Year" for providing employment opportunities for minorities.¹⁰ Gus Bull, Victor Agebite,

Continued Next Page

Leroy Brown, and John Nixon were among the African Americans who worked in Archer's office.¹¹

Archer was a member of the National Technical Association and served as the organization's treasurer for a number of years. He was also a member of the Florida Avenue Baptist Church, which he joined in 1921. Archer was married to Louise Archer, a teacher who was a native of Fayetteville, North Carolina. At the time of her death in 1948, she resided in Durham, North Carolina.¹² Both she and Archer are buried in Arlington National Cemetery.

Sources: Arlington National Cemetery Burial Records (Arlington National Cemetery Administration); D.C. City Directories; D.C. Board of Examiners and Registrars of Architects Case Files; Ethridge, Harrison Mosley. "The Black Architects of Washington, D.C., 1900-Present. Ph.D. Dissertation, Catholic University of America, 1979; Oral Interview with John H. Nixon, July 1994; "Romulus C. Archer, Jr., 77, Architect Here for 40 Years." *Evening Star*, December 1, 1968; Wells, John. "The Virginia Architects, 1820-1955," mss. of forthcoming book, courtesy of the author; Wirz, Hans and Richard Striner. *Washington Deco: Art Deco in the Nation's Capital*. Washington: Smithsonian Institution Press, 1984.

Illustrations: Photo with obit

Further Work: Check Board of Trade files -- bldg for 1954 award
Check 1964 NTA Bulletin for Obituary

CYRIL G. BOW

Originally from Syracuse, New York, Cyril Bow received his B. Arch. from Cornell University. For many years he was the chief draftsman in the office of Albert I. Cassell.¹

His wife, Marguerite Smith Bow, was a music teacher in the Washington public schools for 33 years (Wormley, Young and Phillips schools). She graduated from Miner Normal School and Howard University School of Music (1924). The Bows were members of St. Mary's Episcopal Church. Mrs. Bow died in 1945 and was buried in Harmony Cemetery.²

Sources: Obituary of wife Marguerite Smith Bow. *Washington Post* and *Washington Star*, July 8, 1945; Julian Euell. Oral history interview with Clarence B. Wheat, ; Historic American Buildings Survey documentation for Founders Library compiled by Harrison M. Ethridge; National Technical Association, *National Technical Year Book, 1936-37*, Detroit, 1937; National Technical Association, *National Technical Association Directory, 1949*.

Illustrations: None

Further Research: Call St. Mary's.

HE: 10/16/95



AECOM
516 East State Street
Trenton, NJ 08609
www.aecom.com

609-599-4261 tel
609-392-3785 fax

Memorandum

To Karl Kratzer, AECOM Page 9

CC Angela Jones; John Lawrence (AECOM)

Subject Benning Road Improvements, Historic Architecture Identification Effort

From Johnette Davies

Date June 25, 2014 Revised July 28, 2014

In March 2014, the District of Columbia Historic Preservation Office (DCHPO) provided preliminary guidance about the potential for historic resources within the project study area, including properties recommended for survey and National Register eligibility evaluation under Section 106 of the National Historic Preservation Act. This guidance was based upon a review of known and potential properties in the project Study Area.

The purpose of this memorandum is to confirm the level of effort required to meet the good faith historic properties identification requirement under Section 106. This memorandum provides a proposed Area of Potential Effect (APE) for the project and identifies properties within the proposed APE for the Preferred Alternative (eliminating properties along Minnesota Avenue) that meet the 50-year age criteria for National Register eligibility evaluation. It also enumerates properties previously recommended for survey by DCHPO, as well as additional properties recommended for survey by AECOM.

Properties Recommended for Evaluation by DCHPO

In a letter dated March 25, 2014, DCHPO recommended that the following properties be evaluated for this project:

Table 1: Properties Recommended for Evaluation by DCHPO		
Number	Address	Notes
1	3300 Benning Road, NE	Pepco Power Plant Complex. Built in 1906, the plant was expanded in 1968 and 1972
2	3341 Benning Road, NE	a streamlined building currently known as the "Washington Insurance" building
3	3431-39 Benning Road, NE	a mid-1940s automobile-related shopping complex
4	3445 Benning Road, NE	a substantially altered, but relatively early building, now "Benning Liquors"
5	4202 Benning Road, NE	potentially associated with late 19 th -century African-American community/designed by African-American architects
6	4208 Benning Road, NE	Potentially associated with late 19th century African-American community/designed by African-American

		architects
7	4248 Benning Road, NE	building with some modest architectural detail
8	4270 Benning Road, NE	New Mount Calvary Baptist Church; may have been relocated from the east side of East Capitol and the former site of Payne's Cemetery
9	4510 East Capitol Street, NE	The "Shrimp Boat:" constructed c. 1953, it is already considered a "landmark" of sorts by the local community

The location of these and all other properties described in this document is shown on the attached graphic entitled "Potential Historic Properties in the APE." The map shows where each parcel is located. Please note that some parcels show footprints for buildings less than 50 years of age.

Properties Recommended for Survey by AECOM

In addition to the specific properties identified by DCHPO in Table 1, the agency's letter further states the following:

Please note that additional survey and/or DOEs may be recommended after we learn more about the scope of the project, review a draft APE, and consider the comments of the consulting parties.

The properties in **Table 2** below are recommended for survey because they may have historic or architectural significance based upon preliminary research to date and a brief field view; they also appear to have good integrity.

Table 2: Additional Properties Recommended for Evaluation			
Number	Address	Notes	
10	Benning Road, NE	Call boxes along roadside (photo shows typical examples)	
11	4001 Benning Road, NE	Stewart's Funerals: funeral home built in 1964 for an African-American family-owned and operated business founded in 1900.	

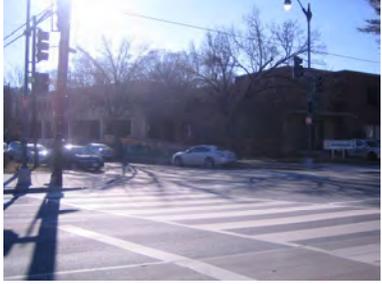
Additional Properties 50 Years or Older in the APE

There are a number of additional properties along the corridor that meet the 50-year age criterion for evaluation that were not included in DCHPO or AECOM recommendations; these are listed in **Table 3**, below. It is unknown at this time whether any of the apartment buildings in Table 3 were built within the period of significance defined in the Multiple Property Documentation Form, "Apartment Buildings of Washington DC 1870-1945." All properties below are in order from west to east.

Table 3: Additional Properties 50 Years and Older in the APE			
Number	Address	Notes	
12	3399 Benning Road, NE	Mid-20 th -century auto sales and service building, now D&C Cab	
13	3621 Benning Road, NE	c. 1952 warehouse and cold storage facility, now Sam's Auto Car/ New Horizons Auto Body Repair	
14	Vicinity of 3700 Benning Road, NE	Former Baltimore & Potomac Railroad/ Alexandria Branch, Baltimore & Ohio Railroad/Pennsylvania Railroad	[no photo]
15	3703-05 Benning Road, NE	Appears to be early 20 th -century warehouse/storage facilities	

<p>16</p>	<p>3917 Benning Road, NE</p>	<p>Connected to a strip mall that faces Minnesota Avenue; little to no historical integrity</p>	
<p>17</p>	<p>3919 Benning Road, NE</p>	<p>Early-20th-century building; some Art Deco details remain at a portion of the cornice, but otherwise altered</p>	
<p>18</p>	<p>3934 Benning Road, NE</p>	<p>Early 20th-century residence, Tudor Revival</p>	
<p>19</p>	<p>3938 Benning Road, NE</p>	<p>Early 20th-century residence, Four Square (building at left in photograph)</p>	
<p>20</p>	<p>3940 Benning Road, NE</p>	<p>Early 20th-century residence, Colonial Revival (building at right in photograph)</p>	

21	3942 Benning Road, NE	Early 20 th -century residence, Colonial Revival	
22	4035-4037 Benning Road, NE	Mid-20 th -century triplex, Tudor Revival	
23	4049 Benning Road, NE	Early 20 th -century duplex	
24	4053 Benning Road, NE	Early 20 th -century residence	
25	4057 Benning Road, NE	Early 20 th -century residence	

<p>26</p>	<p>4061 Benning Road, NE</p>	<p>Mid-20th-century residence, altered bungalow</p>	
<p>27</p>	<p>4145 Benning Road, NE</p>	<p>Mid-20th-century police station; extension along 42nd St.</p>	
<p>28</p>	<p>4201-4243 Benning Road, NE</p>	<p>Early-mid-20th-century block of rowhouses</p>	
<p>29</p>	<p>4228 Benning Road, NE</p>	<p>Mid-20th-century apartment building</p>	
<p>30</p>	<p>4234 Benning Road, NE</p>	<p>Early 20th-century residence (building at left in photograph)</p>	

<p>31</p>	<p>4236 Benning Road, NE</p>	<p>Mid-20th-century apartment building (building at right in photograph)</p>	
<p>32</p>	<p>4244 Benning Road, NE</p>	<p>Early 20th-century residence (building at left in photograph)</p>	
<p>33</p>	<p>4246 Benning Road, NE</p>	<p>Early 20th-century residence with commercial front addition (second building from left in photograph)</p>	
<p>34</p>	<p>4254 Benning Road, NE</p>	<p>Early 20th-century residence</p>	
<p>35</p>	<p>4256-4264 Benning Road, NE</p>	<p>Mid-20th-century apartment buildings</p>	

<p>36</p>	<p>4274 Benning Road, NE</p>	<p>Mid-20th-century apartment building (building at right in photograph)</p>	
<p>37</p>	<p>4280 Benning Road, NE</p>	<p>Early 20th-century residence, brick bungalow</p>	
<p>38</p>	<p>4414 Benning Road, NE</p>	<p>Mid-20th-century restaurant</p>	
<p>39</p>	<p>4430 Benning Road, NE</p>	<p>Former filling station, mid-20th-century</p>	
<p>40</p>	<p>42121 E. Capitol St, NE</p>	<p>Fort Chaplin Park Apartments & Townhomes. Some buildings in the complex face the 4300 block of Benning Road</p>	

41	217-223 42 nd Steet, NE	Mid-20 th -century duplexes	
42	227 and 231 42 nd Street, NE	Mid-20 th -century apartments	

A transit Car Barn that meets the 50-year age criterion for evaluation is located within the PEPCO Power Plant parcel, along Kenilworth Avenue. However, later buildings and the elevated Metro line effectively screen the proposed work from the building’s viewshed and setting. We recommend that the Car Barn does not require evaluation for the purposes of this project.

Proposed Next Steps

The next step for the project is to seek concurrence among DDOT, and DCHPO regarding the level of effort required for the identification of historic properties for this project. The agencies should determine whether all of the potential resources listed in the tables above must be evaluated, whether to limit the evaluations to those previously recommended by DCHPO, or a combination thereof to meet the good faith identification requirement under Section 106. A DCHPO Determination of Eligibility (DOE) form will need to be completed for each property ultimately recommended for survey and evaluation.

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April 8, 2015

Mr. Michael Hicks
Environmental Manager
U.S. Department of Transportation
Federal Highway Administration
District of Columbia Division
1990 K Street, NW
Suite 510
Washington, DC 20006-1103

RE: Formal Initiation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)

Dear Mr. Hicks:

Thank you for your letter of March 16, 2015 which served to formally initiate consultation with the District of Columbia State Historic Preservation Officer (DC SHPO) regarding the above-referenced undertaking. As you are aware, we have been working with DDOT over the last several months to carry out preliminary identification and evaluation efforts that will assist FHWA in meeting its obligations under Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

Of particular note are a number of Determination of Eligibility (DOE) Forms that were prepared by the project consultants and forwarded to our office for review. We appreciate that the forms were thoroughly researched and well-written. Our overall recommendations regarding National Register eligibility are summarized in the attached table. More detailed comments have been incorporated directly into the DOEs which we will forward electronically.

We look forward to consulting further with FHWA and all parties to continue the Section 106 review process. If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841 (for historic built environment) or Ruth Troccoli at ruth.troccoli@dc.gov or 202-442-8836 (for archaeology). Otherwise, thank you for providing this opportunity to review and comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Andrew Lewis".

C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

14-069

Mr. Michael Hicks
 Formal Initiation of Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project (Benning Road Extension)
 April 8, 2015
 Page 2

**DC SHPO Recommendations Regarding the Determinations of Eligibility for the Benning Road
 and Bridge Transportation Improvements Project
 (Benning Road Extension)**

	Recommended Eligible by DC SHPO	Recommended Ineligible by DC SHPO
1		217-223 42nd Street NE
2		227 - 231 42nd Street NE
3	3300 Benning Road NE; PEPCO Power Plant Bld 32	
4		3341 Benning Road NE
5		3399 Benning Road, NE; District Cab Company
6		3423 - 3439 Benning Road, NE
7		3455 Benning Road, NE; Benning Liquors
8		3701 Benning Road, NE; A. Loeffler Sausage & Provisions Co.
9	3938 Benning Road, NE	
10		3940 Benning Road, NE; Kerrick House
11	4001 Benning Road, NE; Stewarts Funerals	
12		4053 Benning Road, NE
13		4145 Benning Road, NE; Police Station/MPD HQ
14	4201 - 4243 Benning Road, NE	
15		4202 Benning Road, NE; Mike's Market; Sherman's Market
16	4208 Benning Road, NE	
17	4228 Benning Road, NE; Benning Road Apartments	
18		4234 Benning Road, NE
19	4236 Benning Road, NE	
20		4248 Benning Road, NE
21		4254 Benning Road, NE
22		4256 - 4264 Benning Road, NE
23	4270 Benning Road, NE; New Mt. Calvary Baptist Church	
24	4274 Benning Road, NE	
25		4510 Benning Road, NE; The Shrimp Boat Restaurant
26		B&O Railroad Alexandria Branch
27	B&P Railroad	
28	Fire and Police Call Boxes along Benning Road, NE	

4212 East Capitol Street, NE – Fort Chaplin Park
 Apartments also determined ineligible



U.S. Department
of Transportation
**Federal Highway
Administration**

**District of Columbia Division
(202) 219-3570 FAX 219-3545**

**1990 K Street, NW
Suite 510
Washington, DC 20006-1103**

July 27, 2015

In Reply Refer To: HFO-DC

Dear Consulting Party to the Benning Road and Bridges Improvement Project:

The Federal Highway Administration (FHWA), in conjunction with District Department of Transportation (DDOT), is preparing an Environmental Assessment (EA) for the Benning Road and Bridges Transportation Improvements Project in accordance with the National Environmental Policy Act (NEPA). The referenced project is located within the Northeast section of Washington, DC and is approximately two miles long. The western terminus for the project is the intersection of Benning Road and Oklahoma Avenue and the eastern terminus is the Benning Road Metrorail Station. The purpose of the proposed project is to address deficiencies in transportation infrastructure conditions, improve safety conditions and operations for both motorized and non-motorized access, and to provide for increased mobility and accessibility by improving transit operations and options within the Benning Road corridor. The proposed improvements are anticipated to be predominantly within the existing DDOT right-of-way.

The project also considers effects to historic properties in accordance with the requirements of Section 106 of the National Historic Preservation Act (16 U.S.C. §470) and its implementing regulations (36 CFR Part 800). FHWA formally initiated the Section 106 process for Benning Road & Bridge Transportation Improvement Project in March 2015. Organizations and individuals with a possible interest in the project are being contacted to solicit their views of the proposed project's potential effects to historic resources; therefore, this is an opportunity for you or your organization to participate in the consultation process. Section 106 of the National Historic Preservation Act pursuant to 36 CFR 800 requires Federal agencies to take into account the effects of their undertakings on historic properties. The views of consulting parties on findings and determinations regarding historic properties affected by the project are being requested. Those parties that express an interest in the Section 106 consultation process regarding this project will be invited to review cultural resource reports and make comments and suggestions regarding strategies to avoid, minimize, or mitigate adverse impacts to historic resources.

Please notify FHWA by letter if you wish to participate as a Consulting Party. Digital copies of letters accepting consulting party status transmitted by email are acceptable. In your response, please provide contact information for yourself or your agency/organization representative. Your reply is being requested within 30 days of receipt of this letter. Hardcopies should be sent to:

identification of consulting parties. I understand DDOT has scheduled a meeting with Andrew Lewis of your staff on March 17, 2015 to discuss this project; my intention is to attend that meeting and engage in consultations with Andrew on this project at that time.

If there are questions or comments, please contact me at 202-219-3513 or michael.hicks@dot.gov. Thank you for your cooperation in this undertaking.

Sincerely,



Michael Hicks
Environmental Manager

Enclosures:

Cc: Andrew Lewis, DC SHPO
Clarence Dickerson, DDOT



U.S. Department
of Transportation
**Federal Highway
Administration**

District of Columbia Division

1200 New Jersey Avenue, SE
East Building (E61-205)
Washington, DC 20590
(202) 493-7020 – Office
www.fhwa.dot.gov/dcddiv/

In Reply Refer To: HFO-DC

December 4, 2019

Mr. Andrew Lewis
Senior Historic Preservation Officer
District of Columbia State Historic Preservation Office
1100 4th Street, SW, Suite E650
Washington, D.C. 20024

Dear Mr. Lewis:

In accordance with the National Environmental Policy Act of 1969 (NEPA); Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations 36 CFR Part 800, the District Department of Transportation (DDOT) in conjunction with the Federal Highway Administration (FHWA) is preparing an Environmental Assessment (EA) for the proposed Benning Road and Bridges Transportation Improvements project in northeast Washington, D.C. As you may recall, the District of Columbia State Historic Preservation Office (DC SHPO) was informed of the undertaking and initiation of the Section 106 process by letter on February 18, 2014. Consultations on the effects of this project have been ongoing with DC SHPO staff who have assisted in the determination of effects on historic and archaeological resources located in the vicinity of the project.

Proposed Action

The Draft EA, released in September 2017, identified two build alternatives. Build Alternative 1 involved constructing the proposed streetcar guideway along the east and westbound curbs of Benning Road while Build Alternative 2 involved constructing the proposed streetcar guideway along the median. Actions common to both Alternatives include:

- extend the H/Benning Streetcar service to the Benning Road Metrorail Station;
- replacement of the Lorraine H. Whitlock Memorial Bridge (Whitlock Bridge);
- modification of the Ethel Kennedy Memorial Bridge to support streetcar traffic;
- construction of a new rail connection to the D.C. Streetcar Can Barn;
- installation streetcar stations and propulsion systems; and
- various safety improvements for motorists, pedestrians, and cyclists.

Based on feedback collected during the public involvement process and the evaluation of potential impacts associated with parking and traffic of Build Alternative 1, DDOT has selected Build Alternative 2 as the Preferred Alternative.

Neither Build Alternative would require permanent conversion of historic properties or parklands for transportation use; however, temporary easements would be required to provide adequate space for construction activities. Both Alternatives would require relocation of historic fire call boxes at the southeast corner of the Benning Road, NE and 36th Street, NE intersection to another similar “location and setting” within the study area. Since the historic fire call boxes would retain their integrity of location and setting, a preliminary determination of “no adverse effect” to the historic fire call boxes has been determined.

Historic and Archeological Resources

Following initial consultation, DDOT used the project’s construction and operational activities to establish the area of potential effects (APE). The APE for archaeological resources encompasses the area that would experience direct impact from proposed ground disturbing activities. The historic built environment APE encompasses the area that is directly adjacent to the proposed undertaking, identified by a site visit and line-of-sight survey. In a letter dated August 20, 2014, DC SHPO concurred that the APEs would be sufficient for the assessment of direct and indirect effects. Within this boundary, DC SHPO identified 9 properties listed on the National Register of Historic Places (NRHP) and 9 properties eligible for listing (see Appendix A in the enclosed Section 106 Technical Memorandum). As the project progressed, the Kingman Park Historic District was added to the NRHP and a total of eleven properties within the historic built environment APE were determined to be eligible (see Tables 1 and 3 in enclosed Section 106 Technical Memorandum). As noted earlier, streetcar components of the Preferred Alternative (track, stops and propulsion system) would be located along the roadway median; therefore, they are farther away from adjacent historic properties.

Temporary easements would be required for the corridor of the Preferred Alternative located adjacent to Kingman and Heritage Island Park, Anacostia Park, the Baltimore & Potomac Railroad, and the PEPCO Powerplant. The temporary easements are required to install temporary fencing, erosion and sediment control measures, and provide adequate space for construction activities. In the Baltimore & Potomac Railroad corridor, the easements will extend approximately 30’ from the perimeter of the Whitlock Bridge. In Anacostia Park, Kingman and Heritage Island Park, and the PEPCO Powerplant, the easements will extend approximately 5’ from the existing edge of sidewalk. No new ground disturbance is expected due to temporary construction related staging.

The actions proposed under the Preferred Alternative could have potential “effects” to historic properties by introducing new sources of noise and vibration associated with the streetcar and visual intrusion associated with a streetcar stop on Benning Road near Fort Mahan Park (between 42nd Street and 44th Street). The noise impacts have been evaluated and determined “insignificant” due to the existing noise environment of the Benning Road corridor; therefore, the noise environment remains consistent. Regarding changes to visual quality (viewshed), DDOT will implement several measures including: burying overhead utilities in select locations; use of context-sensitive design practices which reduce the obtrusiveness of new transportation facilities; and replanting of street trees. The list of measures proposed to further reduce streetcar noise and vibration include: ballast mats; applying flange lubricators; and fixtures (e.g. flange lifters and pointless switches) which eliminate the impact noise from the steel wheel striking the rail gap.

For the archeological resources, since the proposed project occurs on highly disturbed land, it is anticipated that there would be no intact archeological resources within the direct APE of the project. In addition, much of the project area has not been surveyed. As the project moves into final design, DDOT will continue consultation with the SHPO to identify any aspect of the project with potential to “adversely effect” any intact archeological resources and determine if a Phase I archeological survey is required.

Section 106 Initiation, Consulting Party Coordination, and Public Meeting Summary

Since initiation of the Section 106 process, DDOT has distributed a series of project documents among the coordinating agencies, including DC SHPO. These documents include:

- Cooperating Agency Invitations (released May 2014)
- APE Concurrence (released by DC SHPO in August 2014)
- Formal Section 106 Initiation Letter (released by FHWA in March 2015)
- DOE Form Recommendations (released by DC SHPO in April 2015)

An invitation to participate in the Section 106 process as a consulting party was sent to 23 organizations. To date, only the Committee of 100 on the Federal City (Committee of 100) provided a written response demonstrating interest in serving as a consulting party under Section 106. Final Section 106 Report was provided to the Committee of 100 on October 1st, 2019 and their comments were solicited towards the proposed project. To date, DDOT has received no comments from the Committee of 100. DDOT has performed public outreach by holding five public meetings:

- May 18, 2019 - Ward & Leadership Council Meeting
- June 18, 2019 - Advisory Neighborhood Commission 7F
- June 19, 2019 - River Terrace Community Organization
- July 6, 2019 - Marshall Heights Civic Association
- September 19, 2019 – Department of Employment Services (4058 Minnesota Ave)

In addition, there has been ongoing community stakeholder meetings with small groups of the civic associations (Benning Road Civic Association, Kingman Park Civic Association, Parkside Civic Association, River Terrace Association) and ANCs (ANC 5D, ANC 7D, ANC 7E, ANC 7F) in the project area.

Determination of Effects to Cultural Resources

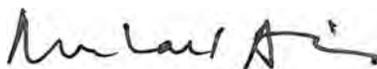
Since Federal funds are participating in this project the requirements of Section 106 of National Historic Preservation Act (NHPA) and its implementing regulations 36 CFR 800 are applicable. Based on the evaluations of historic properties and archaeological resources within the project’s APE and the preliminary assessment of “effects” for the undertaking, FHWA seeks concurrence from DC SHPO that the proposed Action would result in "No Adverse Effect" to historic properties in accordance with Section 106 of the NHPA and its implementing regulations (36 CFR 800).

Thank you for your continued cooperation regarding this project. A hard copy response can be sent to me at:

Federal Highway Administration
District of Columbia Division
1200 New Jersey Avenue, S.E.
East Building, Room E61-205
Washington D.C 20590

A digital copy of your response can be sent to me at: michael.hicks@dot.gov. You can also contact me at 202-493-7023 if you have any additional questions or need additional information or you can contact Robyn Jackson (DDOT) at robyn.jackson@dc.gov. Please copy Austina Casey (DDOT) at Austina.casey@dc.gov on any digital communications with me or my office regarding this project.

Sincerely,



Michael Hicks
Environmental/Urban Engineer

Enclosures: Benning Road and Bridges Transportation Improvements Section 106 Technical Memorandum

Cc: Robyn Jackson
Austina Casey
Kirti Rajpurohit



December 5, 2019

Mr. Michael Hicks
U.S. Department of Transportation
Federal Highway Administration
District of Columbia Division
1990 K Street, NW, Suite 510
Washington, DC 20006-1103

RE: Section 106 Consultation for the Benning Road and Bridge Transportation Improvements Project
(Benning Road Extension)

Dear Mr. Hicks:

Thank you for continuing to consult with the District of Columbia State Historic Preservation Officer (DC SHPO) regarding the above-referenced undertaking. We are writing to provide additional comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

The FHWA letter dated December 4, 2019 summarizes the results of the consultation process that has been on-going since it was initiated in 2014. The letter also specifies a number of measures that will be implemented to avoid adverse effects on historic properties. We concur with the findings of that letter, including FHWA's determination that the undertaking will have "no adverse effect" on historic properties, provided that the specified avoidance measures are implemented, and the following two conditions are met:

1. FHWA/DDOT will consult with DC SHPO to determine the appropriate sites to relocate the historic fire and police call boxes in order to ensure their integrity of location and setting is diminished as little as possible (i.e. the relocation sites should be as close as possible to their historic locations); and
2. FHWA/DDOT will consult further with DC SHPO to determine the need for phased archaeological investigations in previously unsurveyed areas where ground disturbing activities are proposed.

If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841 (for historic built environment) or Ruth Troccoli at ruth.troccoli@dc.gov or 202-442-8836 (for archaeology). Otherwise, thank you for providing these opportunities to review and comment.

Sincerely,

C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

14-069



U.S. Department
of Transportation
**Federal Highway
Administration**

District of Columbia Division 1200 New Jersey Avenue, SE
(E64-455)
Washington, DC 20006
(202) 493-7020 – Office
www.fhwa.dot.gov/dcdiv/

September 21, 2017

In Reply Refer To: HFO-DC

Michaela Noble, Director
Office of Environmental Policy and Compliance
U.S. Department of the Interior
1849 C Street, NW (MS 2462-MIB)
Washington, DC 20240

Dear Ms. Noble:

In accordance with provisions of the National Environmental Policy Act 1969, as amended (49 U.S.C. 4321 et seq.) and the National Transportation Act of 1966, as amended (49 U.S.C. 303 et seq.) and 23 U.S.C. §138, the Federal Highway Administration (FHWA) District of Columbia Division, is submitting the enclosed compact diskette (CD) for your review and comment. The CD contains the Section 4(f) Evaluation developed in conjunction with the Environmental Assessment (EA) for the Benning Road and Bridges Transportation Improvements project in northeast Washington, DC. The Section 4(f) Evaluation is contained in Chapter 5 of the EA.

The proposed action initiating development of the EA would provide: safety improvements; extend H/Benning Streetcar service; and enhance the roadway, pedestrian and bicycle facilities to accommodate each of the referenced transportation modes along the Benning Road corridor between Oklahoma Avenue and the Benning Road Metrorail Station. The project will utilize FHWA funding; therefore, FHWA will serve as the lead Federal agency and the District Department of Transportation is the Applicant (for federal funding). The Federal Transit Administration, the National Capital Planning Commission, and the National Park Service are cooperating agencies in this undertaking.

FHWA regulations 23 CFR §774.5 established a minimum of 45 days for receipt of comments from the DOI for a Section 4(f) Evaluation; however, if comments are not received within 15 days after the comment deadline (approximately November 29th), FHWA may assume a lack of objection and proceed with the action. If there are any questions, I may be contacted at (202) 493-7023 or by email at michael.hicks@dot.gov.

Sincerely,

Michael Hicks
Environmental Manager/Engineer

Enclosure

cc:

Sharon Vaughn-Fair (FHWA)

Steve Plano (DDOT)

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IN REPLY REFER TO:

United States Department of the Interior

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

November 9, 2017

9043.1
ER 17/0437

Michael Hicks
District of Columbia Division
Federal Highway Administration
1200 New Jersey Avenue, SE
East Building, Room E64-455
Washington, DC 20590

Re: Benning Road & Bridges Transportation Improvements – Final Environmental Assessment and Draft Section 4(f) Evaluation

Dear Mr. Hicks:

The Department of the Interior (DOI) has reviewed the Final Environmental Assessment (EA) and Draft Section 4(f) (4(f)) Evaluation for the Benning Road corridor, and submits the following comments.

The DOI understands that The Federal Highway Administration (FHWA), in coordination with the District Department of Transportation (DDOT), prepared this EA for the proposed Benning Road and Bridges Transportation Improvements project in northeast Washington, D.C. The purpose of this proposal is to provide safety improvements; extend H/Benning Streetcar service; and enhance the roadway, pedestrian and bicycle facilities along Benning Road between Oklahoma Avenue and the Benning Road Metrorail Station. FHWA is the lead federal agency for the EA, with DDOT as the local sponsor. The Federal Transit Administration (FTA), the National Capital Planning Commission (NCPC), and the National Park Service (NPS) are cooperating agencies. The DOI also understands that the proposed improvements are anticipated to be predominantly within DDOT right-of-way (ROW).

As a result of the potential impacts to these 4(f) resources, DDOT and FHWA prepared a Draft Section 4(f) evaluation to determine whether there were any feasible and prudent alternatives to the use of the aforementioned properties, and whether the action includes all possible planning to minimize harm to the property resulting from use. Section 4(f) properties located within the one-quarter mile study area include publicly owned parks and/or recreation areas, as well as public or privately owned historic sites (both historic properties and archaeological sites) that are listed in or eligible for the National Register of Historic Places. There are also several parcels administered by the NPS, including: Langston Golf Course, Anacostia Park, Fort Mahan/Civil War Sites (Defenses of Washington), and Fort Chaplin Park.

Based on review of the EA and Draft 4(f), the DOI tentatively agrees with FHWA's preliminary determination that the proposed action would not use any resources that are protected by Section 4(f). DOI also acknowledges that the project will likely enhance hiking and bicycling experiences along two segments of the Potomac Heritage National Scenic Trail network found within the project area. It notes,

however, that the final determination of whether all possible planning has occurred has been reserved for the Final Section 4(f) Evaluation, which will be part of FHWA's final NEPA decision for the proposed action. DOI's final concurrence with these findings may change should changes in the design or new discoveries be made between now and the Final Section 4(f) Evaluation.

For continued coordination with NPS, please contact Joel Gorder, Regional Environmental Coordinator at 1100 Ohio Drive S.W., Washington, D.C. 20242. Mr. Gorder can be reached by phone at (202) 619-7405 or email joel_gorder@nps.gov.

The DOI appreciates the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Lindy Nelson", with a long horizontal flourish extending to the right.

Lindy Nelson
Regional Environmental Officer

Cc: Joel Gorder, NPS



September 18, 2020

Government of the District of Columbia Department of Transportation

Mr. Hamid Karimi
 Kingman Island Project Manager
 District Department of Energy & Environment
 1200 First Street NE, 5th Floor
 Washington, DC 20002

RE: Benning Road & Bridges Transportation Improvements Project, Washington D.C.

Dear Mr. Karimi,

The District Department of Transportation (DDOT), in conjunction with the Federal Highway Administration (FHWA), is preparing a final Environmental Assessment (EA) for the proposed Benning Road and Bridges Transportation Improvements project (the proposed action) in northeast Washington, DC. In accordance with the provisions of the National Environmental Policy Act of 1989 (NEPA), as amended (49 U.S.C. 4321 et seq.), Section 4(f) of the National Transportation Act of 1966, as amended (49 U.S.C. 303 et seq.), and 23 U.S.C. § 138, the FHWA District of Columbia Division has issued a finding of temporary occupancy exception, no use, for the Kingman and Heritage Island Park, a Section 4(f) resource, as a result of the Preferred Alternative selected for the Benning Road and Bridges Transportation Improvements project. The purpose of this letter is to seek concurrence from the District Department of the Energy and the Environment (DOEE) with this finding, as the official with jurisdiction over the Section 4(f) resource (i.e., the Kingman and Heritage Island Park).

The proposed action would provide: safety improvements; extend H/Benning Streetcar service; and enhance the roadway, pedestrian and bicycle facilities to accommodate each of the referenced transportation modes along the Benning Road corridor between Oklahoma Avenue and the Benning Road Metrorail Station. The project will utilize FHWA funding; therefore, FHWA is the lead Federal agency and the District Department of Transportation is the Applicant (for federal funding). The Federal Transit Administration, the National Capital Planning Commission and the National Park Service are cooperating agencies in the undertaking.

The Preferred Alternative would operate at grade predominantly within the DDOT right-of-way (ROW) on Benning Road. DDOT would not require permanent acquisition of ROW from Kingman and Heritage Islands Park for construction or operation of the Preferred Alternative. However, the Preferred Alternative would temporarily impact 1.7 7 acres of Kingman and Heritage Islands Park during construction to accommodate staging area and facilitate the reconstruction of the sidewalk to the south of Benning Road, west of Anacostia Avenue NE. Temporary construction activities would not adversely affect the activities, features, or attributes of the Kingman and Heritage Islands Park that make it eligible for protection under Section 4(f). A finding of temporary occupancy exception, no use, is made for the Preferred Alternative based on the following criteria outlined in 23 CFR 774.13(d):

- The duration (of the occupancy) would be temporary, i.e., less than the time needed for construction of the project, and there should be no change in ownership of the land. The reconstruction of the sidewalk within park property would be less than the construction duration of the entire proposed action because the proposed improvements in this area constitute a small portion of the overall project area. No land ownership would change as a result of the Preferred Alternative.
- The scope of the work would be minor, i.e., both the nature and the magnitude of the changes to the Section 4(f) resource are minimal. Construction activities would affect a small portion of the park in order to reconstruct the sidewalk. As a result, the Preferred Alternative would not affect park facilities.

District Department of Transportation | 55 M Street, SE, Suite 400 | Washington, DC 20003 | 202.671.6813 | www.ddot.dc.gov

- There would be no anticipated permanent adverse physical impacts, nor would there be interference with the activities or purpose of the resource, on either a temporary or permanent basis. The project within park property would include only the reconstruction of an existing sidewalk, which would improve access.
- The land being used would be fully restored, i.e., the resource would be returned to a condition which is at least as good as that which existed prior to the project. The project within park property only includes the reconstruction of an existing sidewalk. As such, the land would be fully restored when construction is complete.
- There must be documented agreement of the appropriate Federal, State, or local officials having jurisdiction over the resource regarding the above conditions.

In the letter dated December 5, 2019, DC SHPO concurred with FHWA's determination that the undertaking would have no adverse effect on historic properties. A no adverse effect determination confirms that the Preferred Alternative does not impact the features, attribute or activities of the historic property. In addition, throughout the project development process, DDOT has been in regular coordination with DOEE regarding the proposed improvements and impacts in the vicinity of Kingman and Heritage Islands Park. Based on the positive responses provided by DOEE during these interactions, as well as the DC SHPO's concurrence on the no-adverse effect determination, DDOT is seeking your concurrence towards the temporary occupancy exception, no use finding for the Preferred Alternative. Please see the concurrence statement below to document your agreement with the conditions, stated above. For your convenience, Chapter 5- Final Section 4(f) Evaluation for the Benning Road and Bridges Transportation Improvements Final EA is provided as an attachment to this letter.

Sincerely,



Austina Casey
Environmental Program Branch Manager
District Department of Transportation

CONCURRENCE:

Having reviewed and provided comments to the Section 4(f) Evaluation provided in Chapter 5 of the EA; I have determined that the project facts match those set forth in the temporary occupancies of land are so minimal as to not constitute a use within the meaning of Section 4(f). I concur that the proposed Benning Road and Bridges Transportation Improvement project will include all appropriate measures to minimize harm and subsequent mitigation necessary to preserve the original features and values of the Section 4(f) property (i.e., Kingman and Heritage Islands Park) as detailed in the Section 4(f) evaluation and in this letter.

By:

Date

10/1/20



Tommy Wells,
Director
District Department of Energy & Environment

Enclosure: Final Section 4(f) Evaluation

Cc: Michael Hicks (FHWA)
Robyn Jackson (DDOT)
Kirti Rajpurohit (DDOT)
David Diickman (DOEE)

District Department of Transportation | 55 M Street, SE, Suite 400 | Washington, DC 20003 | 202.671.6813 | www.ddot.dc.gov



U.S. Department
of Transportation

**Federal Highway
Administration**

Agency Coordination
District of Columbia Division

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1200 New Jersey Avenue, SE
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Washington, DC 20590
(202) 493-7020 – Office
www.fhwa.dot.gov/dcdiv/

In Reply To: HDA-DC

October 23, 2020

Ms. Terry Garcia Crews
Regional Administrator
Region 3 Office
Federal Transit Administration
1835 Market Street
Suite 1910
Philadelphia, PA 19103

Subject: Benning Road and Bridges Transportation Improvements Final Environmental Assessment

Dear Ms. Crews:

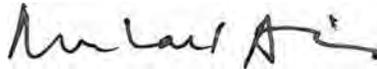
The District Department of Transportation (DDOT), in conjunction with the Federal Highway Administration (FHWA), has prepared the Final Environmental Assessment (EA) for the Benning Road and Bridges Transportation Improvements project. The Federal Transit Administration (FTA) is a cooperating agency for this project; therefore, pursuant to 40 CFR 1501.8 (b)(7), FHWA is providing your agency an opportunity to review the Final EA prior to making it available to the public and completing the NEPA process. The following link has been provided to access the Final EA document: <https://jftt.jacobs.com/download.aspx?ID=7e60118c-ab7a-4bb7-adce-b9d8ec4cf7b8&RID=61c87e6d-b2de-445e-898b-830099515484>. Please note, download of the file may take a few minutes due to its size; to facilitate download, an internet browser should be opened prior to clicking link.

The Final EA for the proposed action: the reconstruction of the Benning Road and Bridges in northeast Washington, D.C., has been prepared in accordance with the National Environmental Policy Act (NEPA) and in compliance with all applicable environmental laws and executive orders. The proposed action would: improve transportation infrastructure conditions; enhance safety and operations along the corridor and at key intersections; enhance and install pedestrian and bicycle facilities; and extend streetcar transit service. The Final EA addresses comments received from the public, Federal and local agencies, and stakeholders on the Draft EA that was published May 4th of 2016. Comments regarding the Draft EA were received via subsequent public involvement and agency coordination activities.

After thorough review and consideration of all comments received, a Preferred Alternative (PA) has been identified in the Final EA. The selection of the PA was based on the lesser impacts associated with Build Alternative 2, the Median Running Streetcar Alternative, that is less impactful on real property, traffic operations, community and other resources compared to the Curbside Alternative. In addition, the PA best meets the purpose and need of the project. The PA would provide for a wired, 11-foot to 12-foot median shared streetcar lane for the length of the Benning Road corridor, and new pedestrian, bicycle, and safety improvements on the Benning Road bridges.

FTA did not provide comments on the Draft EA; however DDOT, in conjunction with FHWA, has undertaken an extensive effort to address all comments received on this project. To expedite project delivery, the Final EA and Finding of No Significant Impact (FONSI) will be released concurrently. If FTA has comments, FHWA is requesting those comments be submitted to DDOT's Environmental Manager, Austina Casey (austina.casey@dc.gov) within two weeks of the receipt of this email. If there are any questions, please contact me at Michael.Hicks@dot.gov. Due to the ongoing COVID-19 pandemic I am working remotely; therefore, I cannot be reached by my office phone number (202)-493-7023.

Sincerely yours,



Michael Hicks
Environmental\Urban Engineer
District of Columbia Division, FHWA

Enclosures: FTA Cooperating Agency Acceptance Letter

cc: Kelly Tyler, Transportation Program Specialist (FTA)
Daniel Koenig, Community Planner (FTA)
Austina Casey (DDOT)
Kirti Rajpurohit (DDOT)
Robyn Jackson (DDOT)



U.S. Department
of Transportation

**Federal Highway
Administration**

Agency Coordination
District of Columbia Division

K.073
1200 New Jersey Avenue, SE
East Building (E61-205)
Washington, DC 20590
(202) 493-7020 – Office
www.fhwa.dot.gov/dcdiv/

In Reply To: HDA-DC

October 23, 2020

Mr. Marcel Acosta, AICP
Executive Director
National Capital Planning Commission
401 9th Street, NW, Suite 500N
Washington DC 20004

Subject: Benning Road and Bridges Transportation Improvements Final EA

Dear Mr. Acosta:

The District Department of Transportation (DDOT), in conjunction with the Federal Highway Administration (FHWA), has prepared the Final Environmental Assessment (EA) for the Benning Road and Bridges Transportation Improvements project. The National Capital Planning Commission (NCPC) is a cooperating agency for this project; therefore, pursuant to 40 CFR 1501.8 (b)(7), FHWA is providing your agency an opportunity to review the Final EA prior to making it available to the public and completing the NEPA process. The following link has been provided to access the Final EA document: <https://jfft.jacobs.com/download.aspx?ID=7e60118c-ab7a-4bb7-adce-b9d8ec4cf7b8&RID=61c87e6d-b2de-445e-898b-830099515484>. Please note, download of the file may take a few minutes due to its size; to facilitate download, an internet browser should be opened prior to clicking link.

The Final EA for the proposed action: the reconstruction of the Benning Road and Bridges in northeast Washington, D.C., has been prepared in accordance with the National Environmental Policy Act (NEPA) and in compliance with all applicable environmental laws and executive orders. The proposed action would: improve transportation infrastructure conditions; enhance safety and operations along the corridor and at key intersections; enhance and install pedestrian and bicycle facilities; and extend streetcar transit service. The Final EA addresses comments received from the public, Federal and local agencies, and stakeholders on the Draft EA that was published May 4th of 2016. Comments regarding the Draft EA were received via subsequent public involvement and agency coordination activities.

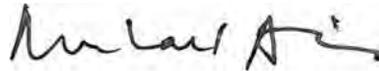
After thorough review and consideration of all comments received, a Preferred Alternative (PA) has been identified in the Final EA. The selection of the PA was based on the lesser impacts associated with Build Alternative 2, the Median Running Streetcar Alternative, that is less impactful on: real property; traffic operations; community; and other resources, compared to the Curbside Alternative. In addition, the PA best meets the purpose and need of the project. The PA would provide for a wired, 11-foot to 12-foot median shared streetcar lane for the length of the Benning Road corridor and new pedestrian, bicycle, and safety improvements on the Benning Road bridges.

NCPC previously provided comments on the Draft EA. As a result of those comments received from NCPC; DDOT, in conjunction with FHWA, has undertaken an extensive planning effort to address

NCPC comments. Comments received from NCPC on the draft EA are enclosed for reference and for your convenience. DDOT's responses to those comments are also enclosed, they are included in Chapter 6 and Appendix L of the EA.

Please note: to expedite project delivery, the Final EA and Finding of No Significant Impact (FONSI) will be released concurrently. If NCPC has additional comments, FHWA is requesting those comments be submitted to DDOT's Environmental Manager, Austina Casey (austina.casey@dc.gov) within two weeks of the receipt of this email. If there are any questions, please contact me at Michael.Hicks@dot.gov. Due to the ongoing COVID-19 pandemic I am working remotely; therefore, I cannot be reached by my office phone number: (202)-493-7023.

Sincerely yours,



Michael Hicks
Environmental/Urban Engineer
District of Columbia Division, FHWA

Enclosures: EA Chapter 6 – Public and Agency Comments
EA – Appendix L

cc: Diane Sullivan (NCPC)
Carlton Hart (NCPC)
Michael Weil (NCPC)
Austina Casey (DDOT)
Kirti Rajpurohit (DDOT)
Robyn Jackson (DDOT)



U.S. Department
of Transportation

**Federal Highway
Administration**

Agency Coordination
District of Columbia Division

K.075
1200 New Jersey Avenue, SE
East Building (E61-205)
Washington, DC 20590
(202) 493-7020 – Office
www.fhwa.dot.gov/dcdiv/

In Reply To: HDA-DC

October 23, 2020

Ms. Tara Morrison
Superintendent
National Capital Parks –East
National Park Service
1900 Anacostia Drive, SE.
Washington, DC 20020-6722

Subject: Benning Road and Bridges Transportation Improvements Final EA

Dear Ms. Morrison:

The District Department of Transportation (DDOT), in conjunction with the Federal Highway Administration (FHWA), has prepared the Final Environmental Assessment (EA) for the Benning Road and Bridges Transportation Improvements project. The National Park Service (NPS) is a cooperating agency for this project; therefore, pursuant to 40 CFR 1501.8 (b)(7), FHWA is providing your agency an opportunity to review the Final EA prior making it available to the public and completing the NEPA process. The following link has been provided to access the Final EA document: <https://jftt.jacobs.com/download.aspx?ID=7e60118c-ab7a-4bb7-adce-b9d8ec4cf7b8&RID=61c87e6d-b2de-445e-898b-830099515484>. Please note, download of the file may take a few minutes due to its size; to facilitate download, an internet browser should be opened prior to clicking link.

The Final EA for the proposed action: the reconstruction of the Benning Road and Bridges in northeast Washington, D.C., has been prepared in accordance with the National Environmental Policy Act (NEPA) and in compliance with all applicable environmental laws and executive orders. The proposed action would: improve transportation infrastructure conditions; enhance safety and operations along the corridor and at key intersections; enhance and install pedestrian and bicycle facilities; and extend streetcar transit service. The Final EA addresses comments received from the public, Federal and local agencies, and stakeholders on the Draft EA that was published May 4th of 2016. Comments regarding the Draft EA were received via subsequent public involvement and agency coordination activities.

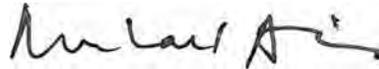
After thorough review and consideration of all comments received, a Preferred Alternative (PA) has been identified in the Final EA. The selection of the PA was based on the lesser impacts associated with Build Alternative 2, the Median Running Streetcar Alternative, that is less impactful on: real property; traffic operations; community; and other resources, compared to the Curbside Alternative. In addition, the PA best meets the purpose and need of the project. The PA would provide for a wired, 11-foot to 12-foot median shared streetcar lane for the length of the Benning Road corridor and new pedestrian, bicycle, and safety improvements on the Benning Road bridges.

NPS did not provide any specific comments on the EA; however, on November 9, 2017, the Department of the Interior (DOI) responded to FHWA's request to review the Section 4(f) Evaluation

that was written as Chapter 5 of the EA. DOI comments stated that they tentatively agreed with FHWA's preliminary determination that the proposed action would not result in a "use" of any resources that are protected by Section 4(f). DDOT, in conjunction with FHWA, has undertaken an extensive planning effort to confine the project to within the DDOT ROW. As a result of these measures, any potential for "use" of Section 4(f) resources were eliminated. Agency correspondence letters are enclosed for your convenience. To expedite project delivery, please note, the Final EA and Finding of No Significant Impact (FONSI) will be released concurrently. As a result of the intent to release the Final EA and FONSI concurrently, if there are further comments from NPS, those comments will be addressed in the Final EA.

As stated previously, given that the PA is less impactful on: real property; traffic operations; community; and other resources inclusive of those protected by Section 4(f) compared to the Curbside Alternative, it is anticipated that the PA would not result in a change of DOI's conditional determination as stated in the referenced DOI letter sent on November 9, 2017. In the event there are comments from NPS on the Final EA, please submit those comments to Austina Casey (austina.casey@dc.gov) within two weeks of the receipt of this email. If there are any questions, please contact me at Michael.Hicks@dot.gov. Due to the ongoing COVID-19 pandemic I am working remotely; therefore, I can't be reached by my office phone number (202)-493-7023.

Sincerely yours,



Michael Hicks
Environmental/Urban Engineer
District of Columbia Division, FHWA

Enclosures: FHWA Cover Letter for Transmittal of Section 4(f) Evaluation CD
DOI Response Letter – Benning Road Bridges EA and Section 4(f) Evaluation

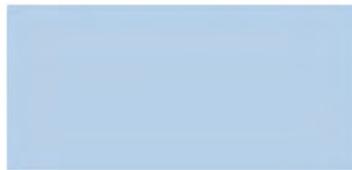
cc.: Joel Gorder (NPS)
Austina Casey (DDOT)
Kirti Rajpurohit (DDOT)
Robyn Jackson (DDOT)

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BENNING ROAD & BRIDGES TRANSPORTATION IMPROVEMENTS

RECORD OF PUBLIC COMMENTS

FINAL SEPTEMBER 2020



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Table 1. Public Comments by Submitter & Topic

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
2	Justin A. Lini	ANC 7D07 Commissioner	As currently configured both Minnesota Avenue and Benning Road are unfriendly to cyclists due to high traffic volumes and speeds. What east-west connectivity is planned for cyclists east of this area? Signage and guidance needs to be provided to connect cyclists with infrastructure identified on page 3-36.	Letter	Bicycle Accommodations	Both Build Alternatives would include a new shared use path between Anacostia Avenue and Minnesota Avenue. Improvements to the sidewalk infrastructure are proposed in final EA east of Minnesota Avenue. No bike facilities are proposed east of Minnesota Avenue. Improvements at the Benning Road and Minnesota Avenue intersection would improve crossing safety.	2.3.1, 2.3.4.1, 2.3.5.1
3	Justin A. Lini	ANC 7D07 Commissioner	The “Viaduct Bridges” are known in the community as the Lorraine Whitlock Bridge. The new bridge should be christened with this name. The railing and fencing materials in the bridge rendering need to be upgraded. Alternatively this area could benefit from public art installations like at New York Avenue or on the Hopscotch Bridge in Ward 6. Benning road is one of DC's major gateways and this area could benefit from features that give it a unique identity and place. Artwork should reflect Ward 7's unique history and culture and ideally should include local artists.	Letter	Bridge Improvements	The final EA references the structure over DC-295 and the CSX Railroad as the Whitlock Bridge. Decisions regarding fencing, rails, and art will be made during project design.	global
4	Justin A. Lini	ANC 7D07 Commissioner	How is this projected going to be financed? Is the funding sufficient to reconstruct the Lorraine Whitlock bridge? Will the sizable expense imposed by this project pull funding other crucial work in Ward 7? This project should only be approved if it can be demonstrated that it would not impact work in other areas of Ward 7, nor pull funding from other Ward projects.	Letter	Cost/Finance	The proposed action would be funded through local and federal funds. The reconstruction of the Whitlock Bridge is included in the cost estimate. Local project prioritization and allocation of funding is not addressed by the EA.	
5	Justin A. Lini	ANC 7D07 Commissioner	Will there be funding available to compensate Ward 7 businesses for loss of business due to construction nuisances and the lack of access to their stores? Such resources were provided to business owners in the H street corridor during the first phases of streetcar construction.	Letter	Neighborhood & Community Facilities Impacts	Maintenance of Traffic (MOT) plans will be developed during project design to mitigate impacts to local businesses during construction. Programmatic resources from Deputy Mayor for Planning and Economic Development (DMPED) and Department of Small and Local business Development (DSLBD) may be used to support local businesses as funding becomes available.	4.12.3.2.
6	Justin A. Lini	ANC 7D07 Commissioner	Page 3-11 Figure 3-4: This map has an error. The PEPCO Power Plant has been demolished and is no longer a potential historic site. In addition the map omits Educare School, located at 600 Anacostia Avenue.	Letter	Neighborhood & Community Facilities Impacts	The PEPCO power plant main building has been demolished, but not the historic building. Although Educare School is within the figure extent, it is not within the study area and, therefore, was not included in the EA map.	Figure 3-5, Table 4-10, Table 4-11
7	Justin A. Lini	ANC 7D07 Commissioner	Page 4-6...noise levels at 42nd Street due to "rail transit idling." This phrase is not defined in the text. Given that it will impact residences in the area an explanation is necessary.	Letter	Noise	The final EA explains the term “idling,” which is the time that a streetcar is at a stop collecting and discharging passengers, and not moving.	4.9

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
8	Justin A. Lini	ANC 7D07 Commissioner	I must highlight the importance of using this project to improve north-south access to the Parkside community. At the very least the improvements to the Viaduct Bridge/ Lorraine Whitlock Bridge must improve traffic flow on 295 and infringe on future access improvements that would benefit the Parkside community. Can DDOT provide more information how this project will interact with the reengineering of 295.	Letter	Other	The Whitlock Bridge would be reconstructed. The existing eastbound and westbound structures would be replaced with a modern single structure. The new structure would also include bicycle and pedestrian improvements such as a shared-use path adjacent to the eastbound lanes, as well as a sidewalk adjacent to the westbound lanes. Modification of DC-295 is not part of the EA; however, the project would not preclude future safety and traffic improvements or impede current Benning Road access and egress for DC-295.	2.3.3
9	Justin A. Lini	ANC 7D07 Commissioner	Page 3-4 Figure 3-1: This map has an error. Parkside, Mayfair and Paradise are not low density residential. They are zoned as R-5-A and consist of town homes and apartment buildings. They are medium to high density residential.	Letter	Other	Figure 3-2 in the final EA reflects the 2016 zoning for the Parkside, Mayfair, and Paradise area.	Figure 3-2
10	Justin A. Lini	ANC 7D07 Commissioner	DDOT needs to provide examples of how bumpout parking can ameliorate parking concerns for churches. Illustrations and diagrams are needed to show how this infrastructure will fit with DDOT's plans for the area.	Letter	Parking	Chapter 4 of the final EA describes the impact to parking in the study area and the proposed parking mitigation plan. Fewer parking impacts result with the median alignment streetcar.	4.2.3.2, 4.2.3.3,
11	Justin A. Lini	ANC 7D07 Commissioner	In contracting and permanent hiring for this project it is of the utmost importance that DDOT and its partners engage the Ward 7 community. Our Ward has a persistently high unemployment rate. Jobs like those provided by the Streetcar extension could make a lasting difference in my neighbors' lives.	Letter	Public Involvement	Socio-economic impacts related to roadway and transit transportation improvements of both Build Alternatives are described in Chapter 4 of the final EA. Section 4.13 describes potential short and longer-term direct and indirect employment impacts related to construction and development in the study area.	4.1.4.2, 4.13.2.2
12	Justin A. Lini	ANC 7D07 Commissioner	The construction of the street car infrastructure in this area will result in the loss of mature street trees. Steps must be taken to mitigate this loss. These trees are a significant asset to the community and are essential to the corridor's character. How will DDOT attempt to preserve as many trees as possible?	Letter	Street Trees	Where trees must be removed, the DDOT Urban Forestry Administration (UFA) as the certified arborist would replace street trees removed within the right-of-way as part Standard Specification 608.07, Tree Protection and Replacement, which requires a diameter breast-height (DBH) inch per DBH inch replacement. Mitigation for canopy loss will be addressed in the design phase and will meet District and DDOT standards and regulations.	4.5.3, 4.6.3.3
13	Justin A. Lini	ANC 7D07 Commissioner	Page 2-32 While detailed plans are provided for infrastructure in River Terrace and at Downtown Ward 7, the same level of detail is not provided for the eastern half of the project. This is troubling as the area already experiences high levels of congestion and has little space available for construction. This area needs more careful planning if the street car is going to function alongside current and future levels of automobile traffic.	Letter	Traffic Impacts	Figures 2-20, 2-21, 2-26 and 2-27 in the final EA display curbside and median streetcar alignments along Benning Road. Segments C and D of each figure show the roadway between Minnesota Avenue and the Benning Road Metrorail Station. Appendix B, General Plans, of the final EA displays more detail regarding track alignment and roadway cross sections at multiple locations for each Build Alternative.	2.3.4, 2.3.5, Appendix B

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
14	Justin A. Lini	ANC 7D07 Commissioner	Many of my residents question the value of a street car extension, especially given the extreme congestion experienced on Benning Road east of Minnesota Avenue. Overall this project should not proceed unless this traffic congestion is accounted for.	Letter	Traffic Impacts	Traffic impacts for the proposed action and, specifically, for the intersection of Benning Road and Minnesota Avenue are addressed in Section 4.2, Transportation and Traffic Operations. The levels of service would remain the same or improve for the proposed 2018 opening year and the 2040 horizon year. Compared to the 2040 No Build Alternative, intersection levels of service (LOS) at 44 th Street would improve from LOS E to LOS D in the evening peak hour under both Build Alternatives 1 and 2 as a result of proposed signal timing modifications at the Benning Road and East Capitol Street intersection.	4.2.2.2
15	Justin A. Lini	ANC 7D07 Commissioner	The report indicates that Benning and East Capitol intersection would decrease to LOS F due to a loss of a lane. The report does not indicate why this lane will disappear. The project should be referenced.	Letter	Traffic Impacts	Your comment is noted. The East Capitol Street project is described in Appendix E, Transportation Technical Memorandum. The transportation network for the 2018 No Build scenario includes changes proposed in the 2016 <i>Financially Constrained Long-Range Plan for the National Capital Region</i> (CLRP). The CLRP includes a range of planned improvements to the roadway and transit networks throughout the metropolitan region. The CLRP change relevant to the study area roadway network is the removal of one of the three lanes in each direction along East Capitol Street between 40th Street and Southern Avenue to improve pedestrian safety. As a result, East Capitol Street would operate with two through lanes in both directions between 40th Street and Southern Avenue.	Appendix E
16	Myron Smith	ANC 7E04 Commissioner	In conclusion, It is my belief that the solution east of Minnesota should: <ul style="list-style-type: none"> • make use of the center median • minimally disrupt the tree canopy • not rely on overhead wiring • address the impact of the loss of street parking along the corridor • enhance the travel experience (safety) for all modes through the area 	Email	Support Build Alternative 2	Your comment is noted.	4.16
17	Myron Smith	ANC 7E04 Commissioner	I am pleased that improvements are being planned for Benning Rd. and the extension of the street car to the Benning Road Metro. As an Advisory Neighborhood Commissioner I would like to see the project continue to move forward and I will work to aid in the full consider and selection of the best possible solution. I know this is not an easy task but it is sorely needed and must be completed. I am in support of extending the street car towards East Capitol, improving the bridge crossing with consideration given to pedestrian/cyclist safety and the beautification of the corridor.	Email	Support Project - General	Your comment is noted.	4.16

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
18	Virgil Lofty	Benning Road Civic Association	Additionally, how will the streetcar affect the Safeway and the library. We only have the one Safeway in the area and I want to understand the streetcars impact.	Telephone	Neighborhood & Community Facilities Impacts	Access to local businesses and community facilities would be maintained throughout construction as described in Section 4.12, Construction Impacts. A Maintenance of Access (MOA) plan would be developed and construction would be phased. After construction, local businesses and community facilities would benefit from improved safety and enhanced transportation services.	4.12
19	Virgil Lofty	Benning Road Civic Association	The residents of the Benning Road Civic Association were not aware of the project. I would like to be involved in the planning as the citizens need to be involved to determine how this will affect Ward 7 and how it will benefit Ward 7.	Telephone	Public Involvement	Since 2012, DDOT has conducted outreach within the communities potentially affected by the proposed roadway and streetcar transportation improvements. This outreach included newsletters, a project website, two public meetings, and a public hearing. Public Involvement efforts are further described in Chapter 6, Public and Agency Coordination.	6
20	Thomas Clark	Capital Traction & Electric Company	The difference between my proposal and much of what DDOT discusses is that my proposal interconnects with Maryland and Virginia. With regards to taking down any trees, the proposal that I suggest wouldn't require removal of any trees. The streetcar would be in the median. The poles would be placed where trees are not. There would be side loading platforms throughout. There would be dedicated right of way. One of the great historical niceties of my proposal, which I've given to DDOT and to the District of Columbia government, is that it would be a longer pre extant right of way where the streetcars had been before. It has a great effect on the environment. Furthermore, the streetcar line that I propose along the Benning corridor would actually service the Mayfair and Deanwood neighborhoods, and would connect up with the Maryland system that is already in function and provide useful service. All the problems that have been expressed tonight would have been taken care of with my proposal. I can't go into detail because there's not enough time, but I would suggest my proposal be given a closer look. The streetcar would go before the Benning Road viaduct, which is the bridge we're talking about. Actually, I had a space in the middle, between the eastbound and westbound sections, to which the streetcar would go to anastomose with Kenilworth Avenue. The streetcar would go northward on Kenilworth Avenue. I suggest that very place.	Public Hearing Testimony	Alternatives Development	Chapter 2, Alternatives Considered, describes the development of 15 concept designs considered for screening as part of this EA. A guiding objective was to implement the proposed action within existing transportation rights-of-way. Concept designs including route, alignment, stops and connections were developed based on input received from public meetings held in 2012 and 2014. In addition, the Benning Road Streetcar Extension Feasibility Study (DDOT, 2013) was also used to inform the concept designs. Other concepts, route alignments, or modifications proposed by members of the public were considered during that time.	2.2.1, 2.2.2
21	Thomas Clark	Capital Traction & Electric Company	In light of substantial opposition by local residents against change that might occur as a result of DDOT's proposed streetcar alignment, Capital Traction and Electric suggests restoration of previously extant streetcar alignment as per Capital Traction and Electric's formal proposal.	Public Hearing Comment Sheet	Alternatives Development	Chapter 2, Alternatives Considered, describes the development of 15 concept designs considered for screening as part of this EA. A guiding objective was to implement the proposed action within existing transportation rights-of-way. Concept designs were developed based on public input regarding route, alignment, stops and connections at meetings in 2012 and 2014, and DDOT's 2013 <i>Benning Road Streetcar Extension Feasibility Study</i> .	2.2.1, 2.2.2

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
22	Monte Edwards	Committee of 100 on the Federal City	<p>The O&M cost estimates contained in Appendix C are DDOT's 2009 cost per mile and 2010 cost per hour, escalated to 2014 values. Why present 2014 costs in this 2016 report and why not use DDOT's actual cost experience, now that the streetcar is running on H Street?</p> <p>The costs of the streetcar portion of the project for the two alternatives are almost identical at \$56 million (page 2-42). There is no comparison of the cost of overhead wire versus a wireless system.</p> <p>How much of the Viaduct replacement cost is due to the CSX need for higher clearances that will allow CSX to increase the capacity of their mainline corridor and how will that be reflected in the cost responsibility for reconstructing the bridge?</p>	Letter	Cost/Finance	<p>O&M costs in the final EA have been revised to reflect 2017 cost per mile and cost per hour values. Since opening in 2016, actual operating and maintenance costs for the H Street/Benning Line have been subject to several contract adjustments associated with service changes and enhancements. Any actual costs with spending for start-up and service adjustment activities would not be necessary for the proposed streetcar extension.</p> <p>Capital costs estimates have been revised to present wireless technology with hybrid vehicles in addition to wired technology.</p> <p>The Whitlock Bridge exhibits poor structural conditions and needs to be replaced. The new bridge would be constructed to meet minimum vertical clearance requirements and to provide adequate queuing space in the eastbound left turn lane.</p>	2.4, Table 4-22, Appendix C
23	Monte Edwards	Committee of 100 on the Federal City	<p>Spingarn School is listed as a historical resource (tables 4-19 and 4-20) that will suffer no adverse effects from the streetcar extension. No explanation is provided.</p>	Letter	Neighborhood & Community Facilities Impacts	<p>Each Build Alternative would operate at grade within DDOT's Benning Road right-of-way. DDOT would not require ROW from the Spingarn Senior High School resource for construction or operation of Build Alternatives 1 or 2. The Spingarn High School significance and attributes are its historic architecture and historic purpose as a school.</p> <p>The school is greater than 450 feet from Benning Road, and direct views are partly obstructed by buildings. As a result, the school would not be impacted by visual changes or streetcar noise and vibration. A no adverse effect determination means that Build Alternatives 1 and 2 would not diminish the integrity and significance of the school as an historic resource.</p>	Chapter 4 sections on historic properties, aesthetics and visual quality, and noise and vibration have updated.
24	Monte Edwards	Committee of 100 on the Federal City	<p>Our comments explain that the section of the draft EA concerning streetcars is outdated, biased and in some places, just plain wrong.</p>	Letter	Streetcar Propulsion	<p>The final EA describes in Chapter 2, Section 2.3.3.5, wired and wireless technologies. The EA identifies a hybrid wireless technology for the streetcar that is consistent with information presented to the City Council in February 2017 (per DC Code § 9-1174).</p> <p>The final EA evaluates extension of the current wired system and a wireless hybrid propulsion system which utilizes batteries and supercapacitors to operate wireless. Hybrid system streetcars would recharge from an overhead rail at stops and could be operate in the L'Enfant City. Final selection of alignment and propulsion will be made in FHWA's NEPA decision document.</p>	2.3.3.5

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
25	Monte Edwards	Committee of 100 on the Federal City	DDOT dismisses aesthetic effects of overhead wires. There are issues of equity that DDOT should consider and DDOT's unsupportable position that any neighborhood that has overhead utility wires is fair game for more overhead wires from streetcars and for the destruction of the existing tree canopy, which provides numerous environmental benefits is clearly contrary to sound public policy.	Letter	Street Trees	Where trees must be removed, the DDOT Urban Forestry Administration (UFA) as the certified arborist would replace street trees removed within the right-of-way as part Standard Specification 608.07, Tree Protection and Replacement, which requires a diameter breast-height (DBH) inch per DBH inch replacement. Mitigation for canopy loss will be addressed in project design and will meet District and DDOT standards and regulations.	4.5.3, 4.6.3.3
26	Monte Edwards	Committee of 100 on the Federal City	<p>Thank you. I am appearing here on behalf of the committee at 100 on the Federal City, which is the oldest citizen based planning organization in the city. We are concerned primarily about the propulsion analysis that was provided in this study. The draft environmental assessment is deficient, both legally and factually, in its treatment of propulsion. The DC Code requires that any extension of the streetcar system beyond the existing train on Benning Road have an analysis of alternative propulsion, non overhead wire propulsion, that it be submitted to the council, and subject to hearing. That has not been done. The factual deficiencies of this is the fact that the analysis is based on data primarily from 2010 up to 2014, and it does not reflect recent advances in non-overhead wire propulsion technology.</p> <p>The batteries and super capacitors are the two primary technologies used to provide wireless propulsion, and they're recognized in the report, but the environmental assessment discusses the shortcomings of each of these technologies separately and fails to talk about how super capacitors and batteries are being combined to overcome the deficiencies of the individual systems.</p> <p>Page 2 49 incorrectly states that no existing wired system has been converted to wireless. In fact, in 2010, super capacitors were installed to power streetcars without overhead wires in the Seville. Previously, streetcar service was stopped and the overhead wires had to be lowered to accommodate religious processions. Page 2 40 claims that wireless propulsion is used only for limited distance or where overhead wiring is deemed unacceptable from the visual perspective or the overhead wire elements would physically interfere with other activities. This statement is wrong and colors the entire environmental assessment of propulsion technology.</p> <p>In 2014, wire free tram service was opened in Nanchang, China using Bombardier equipment. The services use trams to collect power from overhead wires at passenger stations, and then travel in wire free mode for the rest of the time. This is the same system that DDOT proposed two nights ago for the Union</p>	Public Hearing Testimony	Streetcar Propulsion	<p>The final EA describes in Chapter 2, Section 2.3.3.5, wired and wireless technologies. The EA identifies a hybrid wireless technology for the streetcar that is consistent with information presented to the City Council in February 2017 (per DC Code § 9-1174).</p> <p>The EA evaluates extension of the current wired system and a wireless system with hybrid propulsion vehicles that utilize batteries and supercapacitors to operate wireless. Hybrid streetcars would recharge from an overhead rail at stops and could operate in the L'Enfant City where overhead wires are prohibited.</p> <p>Trees along Benning Road east of Minnesota Avenue would be removed due to street widening required for both curbside and median alignments. Final selection of alignment and propulsion will be made in FHWA's NEPA decision document.</p>	2.3.3.5

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
			<p>Station to Georgetown extension.</p> <p>In 2015, the first wireless tram project in China became operational using Siemens equipment. I mention these two because Bombardier is the one who provided the Acela trains, and Siemens supplied about a third of the light rail cars in this system. In 2015, Brookville, an American manufacturer in Pennsylvania, won the technical innovation award for global light rail for its Liberty streetcars that are powered by overhead wires on part of the route and use batteries for the balance.</p> <p>Brookville is now supplying the Liberty streetcars to Dallas, Detroit, Milwaukee, and Oklahoma City. To install overhead wires in the residential section of Benning Road east of 42nd Street, all the existing mature trees would have to be removed. The Union Station to Georgetown streetcar extension is proposed to use wireless propulsion in that part because overhead wires detract from the aesthetics and visual quality of that part of the city.</p> <p>But in this environmental assessment, DDOT claims that overhead wires can be imposed on Anacostia. I suggest that the environmental assessment needs to be withdrawn and redone to address these potential deficiencies and biases concerning propulsion technology. Thank you.</p>				
27	Monte Edwards	Committee of 100 on the Federal City	<p>The legal deficiency is because the project has not complied with DC Code §9-1174</p> <p>The factual deficiency is because he report contains pre-2014 information and thus statements about technology are wrong because of advances in technology.</p> <p>I have attached what I put together about the evolution that has occurred in streetcar propulsion over the last five years.</p>	Email	Streetcar Propulsion	<p>The final EA describes in Chapter 2, Section 2.3.3.5 wired and wireless technologies. The EA identifies a hybrid wireless technology for the streetcar that is consistent with information presented to the City Council in February 2017 (per DC Code § 9-1174).</p> <p>The EA evaluates extension of the current wired system and a wireless hybrid propulsion system which utilizes batteries and supercapacitors to operate wireless. Hybrid system streetcars would recharge from an overhead rail at stops and could operate in the L'Enfant City where overhead wires are prohibited. Final selection of alignment and propulsion will be made in FHWA's NEPA decision document.</p>	2.3.3.5
28	Monte Edwards	Committee of 100 on the Federal City	<p>Why spend the money to reconfigure intersections with little or no improvement in the Level Of Service? Does the EA present the best design to reconstruct these intersections to improve Level Of Service?</p>	Letter	Traffic Impacts	<p>The purpose and need for the proposed action is described in Chapter 1, Purpose and Need. Needs includes safety enhancements, pedestrian and bicycle facilities, the extension of the streetcar service, and transportation infrastructure condition improvements Intersection reconfiguration is designed to reflect a balance of safety, capacity, geometry and circulation improvements while avoiding property impacts and maintaining access.</p>	1, Appendix E
29	Monte Edwards	Committee of 100 on the Federal City	<p>There is no mention of the need to install electric insulation between the tracks and the concrete track slab (as they did on H Street) or the effect of the utility location restrictions on future utility repairs and customer connections in terms of costs and</p>	Letter	Utilities	<p>Utilities, utility relocation and construction mitigation are addressed in Chapter 4, Section 4.7 and Section 4.12.3. The need for and type of utility protection from stray current will be determined in project design in conjunction with final utility relocation and access locations.</p>	4.7, 4.12.3

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
			complexity.				
30	Peter Lloyd	DC Eagle	Concerns relative to the overall construction of this important project...Our address is 3701 Benning Road, and currently the *only* access to our building is via the service road directly adjacent to the Benning Road Bridge. Our concerns are that construction will impede accessibility to our location and ultimately severely hurt our business and building our customer base.	Public Hearing Comment Sheet	Construction Impacts	Access to the service road serving the DC Eagle business would not be obstructed during or after construction. Maintenance of Traffic plans developed during final design will maintain or mitigate impacts to traffic operations and access to private property.	4.12.2.2, 4.12.3.2, Appendix D
31	Peter Lloyd	DC Eagle	I'm concerned about the construction because the accessibility to our building is strictly down that service road, which is directly adjacent to the bridge. The construction and the widening of the bridge might limit or cut off access to our business.	Public Hearing Testimony	Construction Impacts	Access to the service road serving the DC Eagle business would not be obstructed during or after construction. Maintenance of Traffic plans developed during final design will maintain or mitigate impacts to traffic operations and access to private property.	4.12.2.2, 4.12.3.2, Appendix D
32	Peter Lloyd	DC Eagle	Concerns relative to the overall construction of this important project due to the location and accessibility of our business, the DC Eagle. We selected our location, among other things, to help bring business and commerce to Ward 7.	Public Hearing Comment Sheet	Neighborhood & Community Facilities Impacts	Access to the service road serving the DC Eagle business would not be obstructed during or after construction. Maintenance of Traffic plans developed during final design will maintain or mitigate impacts to traffic operations and access to private property.	4.12.2.2, 4.12.3.2, Appendix D
33	Dan Emerine	DC Office of Planning	Finally, we recommend that the EA provide more detail about how persons with disabilities will be accommodated by the improvements within the corridor, especially with respect to platform access for the streetcar line.	Letter	ADA Accessibility	Roadway, streetscape infrastructure, and streetcar facilities will be designed to meet requirements of the Americans with Disabilities Act of 1990 (ADA). Sidewalks, shared use paths, and streetcar stops will meet ADA width and grade requirements. Crosswalks would be provided to access median stop platforms and provide safe crossing for side platforms. For the curbside alignment stop platforms would be adjacent to sidewalks. For the streetcar alignment center platforms would be accessible via crosswalks and ramps from street level to the platform. Chapter 2, Figures 2-22 and 2-27 display typical streetcar stop platforms, sidewalks, and crosswalks for the curbside and median alignments. Appendix B provides more detailed plans showing sidewalks, crosswalks and streetcar stop locations.	2.3.3.1, 2.3.3.4, Figures 2-22, 2-27, Appendix B
34	Dan Emerine	DC Office of Planning	The proposed two-way protected bike lane is shown as 9.5 feet wide, with a 6-inch barrier protected by Park-It barriers. Given the potential of Park-It barriers to be damaged or displaced by fast-moving traffic, OP recommends that DDOT include a raised concrete barrier and/or additional buffer width to separate bicycles from vehicles.	Letter	Bicycle Accommodations	The current 6-inch buffer was used to maintain minimum lane widths. Evaluation of alternative buffer types will occur in project design.	Figure 2-22, Figure 2-28, Appendix B
35	Dan Emerine	DC Office of Planning	In addition, the removal of curbside parking along the length of the corridor would be a significant impact on access to businesses and residences.	Letter	Parking	The final EA describes in Chapter 4, Section 4.2.3, parking impacts associated with each Build Alternative. Existing on-street parking in the study area would be eliminated with Build Alternative 1, the curbside alignment streetcar, whereas Build Alternative 2, the median alignment streetcar, would not result in a net loss of parking in the study area. Section 4.2.3.3 describes parking mitigation measures for Build Alternative 1.	4.2.3, 4.2.3.3, Figure 4-4

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
36	Dan Emerine	DC Office of Planning	We also recommend that DDOT implement the full shared-use trail from Oklahoma Avenue to E. Capitol Street as a component of this project...At 36th Street, the EA shows improvements that would better connect the west side of the street to the shared-use path. However, the east side of 36th would continue to be poorly connected. OP recommends further study of this intersection to improve connectivity, safety, and access on the east side...At Minnesota Avenue, OP notes that the access road providing vehicle access to the property alongside the railroad tracks on the south side of Benning makes pedestrian crossings challenging at this location. OP recommends that alternative vehicle access options be explored for this site, which would remove a significant impediment to pedestrian safety at this intersection.	Letter	Pedestrian Accommodations	The final EA identifies crosswalk connections to the west and east sides of 36 th Street to the shared used path along the south side of the Whitlock Bridge. Closing the access road at Minnesota Avenue and seeking alternate access to the property adjacent to the railroad was considered. The current roadway is the sole access to properties south of Benning Road adjacent to the CSX Railroad. Alternate access would require coordination with property owners facing Minnesota Avenue and purchase of right-of-way.	Figures 2-5
37	Dan Emerine	DC Office of Planning	Either build alternative will result in the loss of a significant number of mature trees. Chapter 4 states that “When trees must be removed, as identified for the Eastern Benning Road viewshed, they would be replaced in coordination with the UFA’s Tree Planting Map.” We recommend that the EA provide more detail about the mitigation effort summarized here. It is unclear from this brief statement whether efforts will be made to plant replacement trees in proximity to the locations of removed trees, how closely replacement trees will be planted, or what the expected timeline will be to full restoration of a mature tree canopy.	Letter	Street Trees	Where trees must be removed, the DDOT Urban Forestry Administration (UFA) as the certified arborist would replace street trees removed within the right-of-way as part Standard Specification 608.07 Tree Protection and Replacement, which requires a diameter breast-height (DBH) inch per DBH inch replacement. Mitigation for canopy loss is addressed in the design phase and will meet District and DDOT standards and regulations.	4.5.3, 4.6.3.3
38	Dan Emerine	DC Office of Planning	The EA does not directly address the potential environmental impacts of the traction power substations (TPSS) that would be necessary for the operation of the system.	Letter	Streetcar Propulsion	The final EA include additional details on locations and impacts of TPSS. Chapter 2, Section 2.3.3.6 describes TPSS characteristics and locations. Chapter 4 describes impacts and proposed mitigation.	2.3.3.6, 4.1.2, 4.1.3, 4.3.2.4, 4.4.2.4, 4.5.2.4, 4.6.1.2, 4.7.2.4, 4.8.2.4, 4.9.2.4, 4.10.2.4, 4.11.2.4, 4.12.2.4, 4.13.2.3, 4.14.2.2, 4.15.2.4, 4.16
39	Dan Emerine	DC Office of Planning	We recommend that the final document provide additional detail regarding decision-making criteria for stop/platform placement. Stops appear to have been placed to serve commercial and mixed-use nodes and locations of higher land use intensity. The proposed stop at Kingman Island presumably has been located to improve access to a major park and event venue. Stop placement thus appears to be broadly supportive of existing and future land use. It would be helpful to make explicit the rationale for choosing these locations, and the benefits of serving them.	Letter	Streetcar Stops	The final EA describes in Chapter 2, Section 2.3.3.4, the rationale for locating streetcar stops. Stop platform locations were identified based on operations, current and proposed geometry, accessibility, safety, and land use.	2.3.3.4

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
40	Dan Emerine	DC Office of Planning	OP notes that at least two new large development projects are under construction near proposed streetcar stops: the St. Stephen's property at 40th Street and the So Others Might Eat mixed-use project at 45th Street...OP recommends that DDOT coordinate with property owners to ensure that site design and access do not impede streetcar operations.	Letter	Streetcar Stops	As the proposed action moves forward into project design, a Maintenance of Traffic (MOT) plan will be developed with input from property owners and developers in the decision-making process.	4.12.2.2, 4.12.3.2, Appendix D
41	Dan Emerine	DC Office of Planning	OP finds that there are a number of reasons to prefer Build Alternative 2 over Build Alternative 1.	Letter	Support Build Alternative 2	Comment noted.	4.16, Table 4-22
42	Dan Emerine	DC Office of Planning	OP finds that both alternatives, in general, are supportive of the plans and policies embodied in the Comprehensive Plan and the Benning Road Framework Plan.	Letter	Support Project - General	Comment noted.	
43	Dan Emerine	DC Office of Planning	Build Alternative 1 presents the possibility of significant conflicts with WMATA bus service at the same platforms. As noted in Chapter 1 of the EA, buses already experience problems with schedule adherence. In our view, it is unlikely that schedule coordination between the bus and streetcar services will be sufficient to adequately address the potential for bunching and simultaneous arrivals.	Letter	Transit Operations	The median alignment eliminates conflicts as bus stops and streetcar stop platforms are separate. The curbside alignment would result in the potential for conflicts related to simultaneous arrivals and delays due to a stopped transit vehicle. Also, the curbside alignment would require that a greater length of curb and sidewalk space be reserved to accommodate bus and adjacent streetcar stops.	2.3.4.1, 2.3.4.2, Appendix B, 4.16, Table 4-25
44	Raymond Kollock	DC Water	For the long term operations and maintenance of the water distribution system, the preferred option is for the median-running streetcars. This allows for better access between the water mains and the buildings with water customers.	Letter	Support Build Alternative 2	Comment noted.	4.16, Table 4-25
45	Raymond Kollock	DC Water	<p>Water System Comments:</p> <ul style="list-style-type: none"> - Whenever the existing water main piping is impacted by the streetcar facilities, the expectation will be that a new, relocated water main will be required. Water mains parallel to the streetcars should have appropriate offset distances. Water mains that cross the streetcar tracks should be perpendicular (or as close as possible) to the tracks, and shall be installed within casing pipe. Location of valves and other points of maintenance should be appropriately distanced from the operations of the streetcars. - In an effort to protect the existing water infrastructure, the project should provide corrosion mitigation design along the metallic water mains in areas where the pipes are more susceptible to discharge the stray current. <p>Sewer System Comments:</p> <ul style="list-style-type: none"> - In terms of the impacts to DC Water sewers, the EA states that some sewers would need to be relocated that currently run under the proposed track slab. There are no large interceptors that run along this route, and there is only one crossing for a large interceptor. This occurs right at the start of the proposed tracks where the UESI crosses under Benning Road. For this crossing, pre- and post-CCTV inspections should be completed 	Letter	Utilities	Utility coordination including relocation, protection and access will be addressed during project design.	4.7.3, 4.12.2.2

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
			to verify that no damage was caused to the sewer from construction. If damage is caused, immediate rehabilitative efforts should be undertaken to remediate these issues. - The rest of the sewers that intersect or run parallel to the proposed work are smaller pipes ranging in diameter from 10 to 24 inches. All sewers that will be impacted by the new streetcar facilities and can be moved to avoid this conflict, should be relocated to a safe distance away from the new infrastructure. Additionally, new manholes should be installed that will provide ample access for maintenance. For the sewers that stay in parallel or crossing of the new tracks, pre- and post-CCTV inspections should be completed, and if necessary, rehabilitative efforts should be undertaken to remediate possible damage.				
46	Lucy A. Kempf	NCPC	The draft EA describes two potential propulsion systems; however, we note that the actual system will be determined during final design. Given the potential visual impacts of overhead wires, as well as any specific infrastructure needs related to the network, we recommend identification of a preferred propulsion system in the final EA to make the analysis more meaningful and mitigate impacts...	Letter	Streetcar Propulsion	Impacts for both wired and wireless propulsion are documented in the final EA for both the curbside and median alignments. A final recommendation will be made in the NEPA decision document.	2.3.3.5, 4.16, Table 4-25
47	Lucy A. Kempf	NCPC	The EA should include analysis that reveals the location and orientation of major system elements and associated infrastructure and their relationship with the streetscape, open spaces, and historic and natural resources.	Letter	Neighborhood & Community Facilities Impacts	Chapter 2 of the final EA includes additional detail for location, impacts, and mitigation associated with TPSS.	2.3.3.6, 4.1.4.2, 4.2.6.2, 4.5.2.4, 4.8.2.4, 4.9.2.4, 4.10.2.4, 4.11.2.4, 4.12.2.4, 4.15.2.4
48	Lucy A. Kempf	NCPC	Noise levels near Langston Golf Course and Fort Mahan Park are shown as "severe" and "moderate," respectively, and the draft EA describes a variety of potential mitigation measures.	Letter	Noise	Traffic noise impacts the portion of the historic district adjacent to Benning Road in the existing condition. No changes in the level of traffic noise impacts would occur as a result of Build Alternatives 1 or 2. Streetcar operations would not exceed FTA's operational thresholds for impact at the historic district. As a result, no noise impact is anticipated to occur.	Appendix J
49	Lucy A. Kempf	NCPC	In recognition of the close connection between pedestrian safety; an attractive, robust streetscape; and encouraging pedestrian activity, we encourage DDOT to develop a Benning Road streetscape plan that is worthy of the corridor's Great Street status.	Letter	Pedestrian Accommodations	Project design will incorporate streetscape design in coordination with Great Streets objectives and guidelines.	3.1.1.3
50	Lucy A. Kempf	NCPC	The Federal Environment Element of the Comprehensive Plan includes a no net tree loss policy for all federal projects...	Letter	Street Trees	No trees would be removed from NPS property. If NPS trees were removed, the EA would comply with the no net tree loss policy for federal projects.	4.5.3, 4.6.3.3

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
51	Lucy A. Kempf	NCPC	However, in light of the corridor's adjacency to federal properties such as Langston Golf Course and Fort Mahan Park, we recommend adding study viewsheds from within these properties, looking across Benning Road, to gauge potential visual impacts of the stations and overhead systems to these open spaces.	Letter	Streetcar Propulsion	The proposed action would be a neutral visual change for both travelers along Benning Road and users of Langston Golf Course and Fort Mahan Park. For golf course and park users, the focus of activity is internal to each the recreation facility. The visual changes along Benning Road are at the edges of each property where existing transportation features characterize existing views.	3.5.3, 4.5.2.2, 4.5.2.3
52	Lucy A. Kempf	NCPC	All TPSS locations near or adjacent to NPS property should be clearly noted and any proposed screening should be described in the final EA.	Letter	Streetcar Propulsion	Additional details on locations, impacts, and mitigations of TPSS have been added in the final EA.	2.3.3.6, 4.1.2.2, 4.1.2.3, 4.1.4.2, 4.1.4.3, 4.3.2.4, 4.4.2.4, 4.12.2.4
53	Russell Klein	Parkside Civic Association	Communities along Benning Road, east of Minnesota Avenue, are liable to see a variety of impositions occur from the construction process as well as the changes in transit configuration. I urge the Department of Transportation to aggressively court these residents to account for their needs. I state this to strictly contrast it with the pattern of non-engagement our community has experienced with: Parkside-community sidewalk repairs, Anacostia Bicycle Trail, and Streetlamp replacements.	Letter	Public Involvement	Since 2012, DDOT has conducted outreach within the communities potentially affected by the proposed action. This included newsletters, a project website, two public meetings, and a public hearing. Public Involvement efforts are further described in Chapter 5, Public and Agency Coordination. A public meeting will be held after release of the final EA for public review.	5
54	Russell Klein	Parkside Civic Association	Bear in mind, we have ongoing concern with the city's handling of projects and, on many recent occasions, have not involved or invited honest and transparent feedback from our community leaders.	Public Hearing Testimony	Public Involvement	Since 2012, DDOT has conducted outreach within the communities potentially affected by the proposed action. This included newsletters, a project website, two public meetings, and a public hearing. Public Involvement efforts are further described in Chapter 5, Public and Agency Coordination.	5
55	Russell Klein	Parkside Civic Association	Traffic congestion for those living along the 295 corridor is of paramount concern. For whatever else this project may accomplish, work done to the Lorraine H. Whitlock Memorial Bridge ought to: a. Minimize congestion during critical hours b. NOT exacerbate the level of intrusion of commuters inappropriately entering the Eastland Gardens community in the attempt to circumvent the morning rush hour c. Take into account the absolute necessity of improving the interchanges occurring below where northbound cars taking a U-turn from the southbound Kenilworth off-ramp battle for entry into the passing lane, and cars from eastbound Benning Road must battle the same, only 200 yards beforehand. Both of these situations require deliberate mitigation in long-term planning	Letter	Traffic Impacts	Modification of DC-295 is not part of this EA; however, the proposed action would not preclude future safety and traffic improvements. Any proposed improvements to DC-295 would be addressed in a separate study process.	2.3.3, Appendix E

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
56	Aaron Blair	U.S. EPA Region III	Improvements included in both build alternatives may not extend outside of the DDOT right-of-way may, as described in 4.7.2, however, it is important to take into consideration the temporary impacts to surface water resources that may occur during construction as described in section 4.13.2.2, such as wetting, paving, and landscaping exposed earth areas. This is especially important when constructing on Bridge No. 52 over the Anacostia River which is listed as impaired in nutrients (1996), sediments (1996), fecal bacteria – non-tidal waters (2002), impacts to biological communities (2002), toxics – polychlorinated biphenyls (PCBs) (2002), and toxics – heptachlor epoxide (2002). Best Management Practices (BMPs) should be implemented during construction to reduce potential impacts to the Anacostia River.	Email	Construction Impacts	Construction impacts to surface water resources during construction may include wetting, paving, and landscaping exposed earth areas. However, strict adherence to current District of Columbia Standards and Specifications for Soil Erosion and Sediment Control will be followed. The standards include best management practices for: road stabilization, sediment barriers, dikes and diversions, sediment traps and basins, downdrains and flumes, inlet and outlet protection, dewatering strategy, waterway and stream protection, site preparation, vegetative stabilization, and other practices. If erosion and sediment control best management practices require space outside of the DDOT right-of-way, DDOT will coordinate with Washington D.C. Watershed Protection Division.	4.12.3.2
57	Aaron Blair	U.S. EPA Region III	It is important that Best Management Practices (BMPs) are implemented to avoid impacts to these sites and that any material that is dredged at these sites be transported and disposed of properly. With eight of the REC sites identified as being at high risk for impact due to the project, DDOT should also outline steps that will be taken to mitigate any potential impacts to these hazardous material sites.	Email	Hazardous Materials	Best Management Practices (BMPs) would be used on the construction site, such as development of a Contaminated Material Management Plan, pollution control devices, development of spill prevention programs, installation and maintenance of runoff diversion and secondary containment structures. The management of contaminated soil and water on the site and disposal off-site would be conducted in accordance with applicable District of Columbia solid waste management regulations and water management regulations. Additionally, REC sites would be further evaluated during final design and monitored during construction.	4.12.3.2
58	Aaron Blair	U.S. EPA Region III	In order to support the potential new businesses that may arise from the project and to allay the loss of on-street parking to some residences as described in section 4.1.3.3, the parking option illustrated in Figure 4-17 (or similar) should be constructed to mitigate this loss. This will be necessary to maintain or improve the existing parking conditions for local residents and businesses, which are expected to experience significant growth in the future.	Email	Parking	The final EA describes in Chapter 4, Section 4.2.3, on-street parking impacts associated with each Build Alternative. Existing on-street parking in the study area would be eliminated with Build Alternative 1, the curbside alignment streetcar, whereas Build Alternative 2, the median alignment streetcar, would not result in a net loss of parking in the study area. Section 4.2.3.3 describes parking mitigation measures for Build Alternative 1.	4.2.3, 4.2.3.3, Figure 4-4
59	Aaron Blair	U.S. EPA Region III	EPA understands the purpose and need for the proposed action and appreciates the innovative ideas to improve transportation services and conditions in the area. The described alternatives provide an effectual means of accomplishing the purpose and need of the project with minimal impact.	Email	Support Project - General	Comment noted.	

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
60	Aaron Blair	U.S. EPA Region III	In section 2.7.1 it is mentioned that modifications of the deck will be made to the Benning Road Bridge over Kingman Lake. The EPA recommends that the potential impacts to the structure of the bridge be considered, which may also require modifications or alterations of the erosion controls under/adjacent to the Benning Road Bridge. We also suggest considering how modifications to both bridge No. 77 (over Kingman Lake/Island) and bridge No. 52 (over Anacostia River) may cause impacts to Waters of The United States (WOTUS). It is also important that these modifications do not impact the boating lane indicator lights on Bridge No.52, therefore, boating traffic in the Anacostia.	Email	Surface Water Resources	Modifications to Bridge Nos. 52 and 77 would generally apply to the deck and therefore would not change the footprint of the structure. Erosion control would be necessary for addressing construction activities. These erosion control measures would follow DOEE standards and specifications as described in the 2003 Erosion and Sediment Control Handbook, and the 2013 Stormwater Rules published by DOEE. The construction permitting process would offer an opportunity to review any necessary measure to control erosion. Impacts to WOTUS would not occur as the construction specifications will require that any debris or deleterious substances be prevented from entering the Anacostia. The boating lane indicator would not be impacted.	4.12.3.2
61	Greg Billing	WABA	On the rollout of the H Street line, it became clear that track placement has serious implications for streetcar operations and bicyclist safety. Running streetcars along the right side of the street places tracks exactly where bicyclists most commonly ride. Since bike tires easily slot into and catch on the streetcar tracks when riding parallel to them, crashes occur frequently on H Street. These are preventable with better designs found around the world.	Letter	Bicycle Accommodations	The final EA describes impacts associated with each Build Alternative. Alternative 2, the median alignment, reduces the potential for conflict between bicyclists and the streetcar since streetcar tracks would be in the median.	2.3.3, 2.3.4, 2.3.5, 4.16
62	Greg Billing	WABA	1. There must be continuous protected bike lanes through the full corridor. A multi-use path is not acceptable. The streetcar will attract more pedestrian traffic. 2. The protected bike lanes must connect to the Anacostia Riverwalk Trail at Anacostia Ave, and Oklahoma Ave, NE 3. The Minnesota Avenue & Benning Road intersection must have protected bike lanes through the intersection – This is a top 5 high crash intersection in the city.	Public Hearing Comment Sheet	Bicycle Accommodations	Build Alternatives were developed to achieve a multimodal design that addresses safety and capacity and maintains current uses within existing rights-of-way. These guidelines affect and limit some desired aspects of the project design. The Build Alternatives therefore include a shared use path between Anacostia Avenue and Minnesota Ave; this serves as a continuation of the current bike path between Oklahoma Avenue and Anacostia Avenue. The EA also identifies a bike lane option that could be implemented along Benning Road between Anacostia Avenue and 36th Street with the curbside or median alignments. This option eliminates one eastbound lane for vehicular traffic; east of 36th Street a shared use path would be implemented on the south side (eastbound) of the new structure over DC-295 and the CSX Railroad.	2.3.3, 2.3.4, 2.3.5

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
63	Greg Billing	WABA	The only truly effective solution is placing the streetcar tracks in the center lane. Including a high quality separate bike facility, such as a protected bike lane or an off-street trail further reduces conflicts. This project will negatively impact the signed bicycle route as proposed. The EA should recognize this significant impact to bicyclist mobility and provide options to mitigate. Since no convenient parallel route exists, the study should seriously examine full time parking restrictions, a road diet with bike lanes, or off-street bicycle accommodations... If the scope of the project does not allow additional right of way for a proper two-way protected bike lane, a westbound traffic lane should be removed as well to accommodate a westbound one-way protected bike lane. A standard one-way protected bike lane can easily fit into the space of a 10 foot traffic lane. Reducing the lanes from 8 to 6 still accommodates current car volumes and the additional 20 feet can be used for improved pedestrian spaces, protected bike lanes, short trees or stormwater improvements.	Letter	Bicycle Accommodations	Build Alternatives were developed to achieve a multimodal design that addresses safety and capacity and maintains current uses within existing rights-of-way. These guidelines affect and limit some desired aspects of the project design. The Build Alternatives therefore include a shared use path between Anacostia Avenue and Minnesota Ave; this serves as a continuation of the current bike path between Oklahoma Avenue and Anacostia Avenue. The final EA identifies for each Build Alternative a bike lane option that could be implemented along Benning Road between Anacostia Avenue and 36th Street. This option eliminates one eastbound lane for vehicular traffic; east of 36th Street a shared use path would be implemented on the south side (eastbound) of the new structure over DC-295 and the CSX Railroad.	2.3.3, 2.3.4, 2.3.5
64	Greg Billing	WABA	This project should address the issues identified in that [DDOT's High Crash Intersection Site Visit 2016] report, especially changing signal order to allow a Leading Pedestrian Interval crossing Benning Road, lessening the crosswalk setback on the west leg, and limiting high speed east to south right turns from the bridge. Additionally, this is a prime opportunity to design a safe bicycle transition from the westbound lane on Benning Road to the suggested side path on the south side of the bridge.	Email	Bicycle Accommodations	The final EA describes bicycle improvements as related to a shared use path in the study area along the south side of Benning Road. Signal order and timing, crosswalk setbacks, and speed limits would be addressed during final design.	2.3.3, 2.3.4, 2.3.5
65	Greg Billing	WABA	DDOT's streetcar planning process must learn from past missteps and borrow ideas that work. Build Alternative 1 would create unnecessary bicycle hazards, increase crash rates, and discourage bicycle use in growing part of the city. We strongly recommend the center lane alignment and urge DDOT to reject Build Alternative 1.	Letter	Support Build Alternative 2	The final EA describes impacts associated with each Build Alternative. Alternative 2, the median alignment, reduces the potential for conflict between bicyclists and the streetcar since streetcar tracks would be in the median.	2.3.3, 2.3.4, 2.3.5, 4.16
66	Valerie Wheeler	WABA Member	It's important to force bikers to a safe biking strip when trolley tracks exist.	Email	Bicycle Accommodations	The final EA describes impacts associated with each Build Alternative. Alternative 2, the median alignment, reduces the potential for conflict between bicyclists and the streetcar since streetcar tracks would be in the median.	4.16

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
67	Valerie Wheeler	WABA Member	<p>As a member of WABA, I hope my experience helps create the safest streetcar system possible...</p> <p>While riding along a roadway with trolley tracks near the water, my front tire got locked into a space between the road and the rail bringing the bike to a sudden halt. I lost control and fell to the concrete scraping my knees and hands which made me pretty bloody. A shop owner called for an ambulance and helped get me into the shop to wait waiting. Fortunately, the medics could treat me on site and there was nothing broken. The shop owner and medics were incredible people!</p> <p>It's important to force bikers to a safe biking strip when trolley tracks exist.</p>	Email	Bicycle Accommodations	The final EA describes impacts associated with each Build Alternative. Alternative 2, the median alignment, reduces the potential for conflict between bicyclists and the streetcar since streetcar tracks would be in the median.	4.16
68	Max Broad	WABA Member	<p>I personally have experienced injury as a result of the trolley tracks on H St . My tire got caught in the tracks in October 2012, and I fell off of my bike. I was not badly hurt, but I remember the situation vividly; my pants were torn, and hands and legs were badly scraped. It was funny actually, because there was a zombie-walk happening that night, and hundreds of people were on H St in zombie makeup and ragged clothes. I remember reflecting on how I resembled these night-walkers, with my bloody torn clothes! Nonetheless, it's not the way I want to fit in.</p> <p>If you have not already seen it, please consider these recommendations for how to make the plans safer. http://www.waba.org/blog/2016/05/benning-road-streetcar-plans-make-biking-less-safe/</p>	Email	Bicycle Accommodations	The final EA describes impacts associated with each Build Alternative. Alternative 2, the median alignment, reduces the potential for conflict between bicyclists and the streetcar since streetcar tracks would be in the median.	4.16
69	Max Broad	WABA Member	As a DC resident and member of the Washington Area Bicycle Association (WABA), I am one of the many bicyclists who is concerned about streetcar urban design that could be dangerous for those of us on two wheels.	Email	Bicycle Accommodations	The final EA describes impacts associated with each Build Alternative. Alternative 2, the median alignment, reduces the potential for conflict between bicyclists and the streetcar since streetcar tracks would be in the median.	4.16
70	Aaron Overman	WMATA	Both Build Alternatives present significant operating challenges to Metrobus services due to insufficient proposed lane widths. Metrobus requires a minimum 11 foot lane width in which to operate, which encompasses the dynamic envelope of the bus and mirrors with a few inches on each side to spare. Lane widths throughout the project must be revised to a minimum of 11' in any travel path of a Metrobus route in order to allow for continued Metrobus operation, including the ability for a Metrobus to pass a stopped streetcar.	Email	Lane Width	The proposed action would widen lanes to be used by buses or the streetcar from the existing 10 feet to 11 or 12 feet.	2.3.4, 2.3.5, Appendix B

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
71	Aaron Overman	WMATA	Without exact specifications and design parameters – including integration with proposed bicycle lanes at bus stops – the provision of shared stops cannot be assured. In the case of the existing streetcar system and vehicles, the goal of shared platforms was determined infeasible late in the project’s development. This lesson learned from the existing streetcar system should be taken into account and points toward the need for early, continuous, and detailed discussions of how Metrobus vehicles, stops, and customers can be accommodated alongside the proposed streetcar regardless of the Build Alternative selected.	Email	Streetcar Stops	Streetcar and bus stop location concepts are shown in the final EA. Coordination with WMATA will continue during final planning and design to locate stops per WMATA bus stop guidelines and in accordance with WMATA's Design and Placement of Transit Stops (2009) manual.	Figures 2-23, 2-29
72	Aaron Overman	WMATA	Metrobus operates the X1, X2, X3 and X9 service throughout the Benning Road EA study area and will continue to do so regardless of any development of a streetcar extension. Therefore, retention of existing Metrobus stops in the Benning Road corridor and ensuring that service to existing and/or relocated bus stops can be provided safely and without delay to buses is of paramount concern.	Email	Transit Operations	Coordination with WMATA will continue during final planning and design to locate stops per WMATA bus stop guidelines and in accordance with WMATA's Design and Placement of Transit Stops (2009) manual. The purpose of the proposed action is to increase mobility and accessibility by improving transit operations and options. The streetcar would be implemented in addition to current service.	2.3.2, 2.3.3.4
73	Jeanette Martin		One of the things that I noticed about the new streetcar is that it has included everybody but people with disabilities. Trying to get on the streetcar, I needed two people to help me. Getting off the streetcar, I needed someone to help me. I am not totally blind. I have very low vision. I think the design of the streetcar completely ignored the population of us who have disabilities.	Public Hearing Testimony	ADA Accessibility	Streetcar facilities will be designed to meet requirements of the Americans with Disabilities Act of 1990 (ADA). More detail will be provided during project design. Stop platforms will be wheelchair accessible.	2.3.3.4
74	Norman Comfort		Okay, will the platforms at streetcars be wheelchair accessible?	Public Hearing Testimony	ADA Accessibility	Streetcar facilities will be designed to meet requirements of the Americans with Disabilities Act of 1990 (ADA). More detail will be provided during project design. Stop platforms will be wheelchair accessible.	2.3.3.4
75	Norman Comfort		Will the platforms and streetcars be wheelchair accessible?	Public Hearing Comment Sheet	ADA Accessibility	Streetcar facilities will be designed to meet requirements of the Americans with Disabilities Act of 1990 (ADA). More detail will be provided during project design. Stop platforms will be wheelchair accessible.	2.3.3.4

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
76	Remetter Freeman		The original plan was to come the Grant St. Why was route changed to a line that does not serve homes from Minnesota Avenue metro station? More people would be served on northern side of	Public Hearing Comment Sheet	Alternatives Development	Chapter 2, Section 2.2.1 of the final EA describes 15 potential concepts, including 10 concepts that routed the streetcar to the Minnesota Avenue Metrorail Station with a terminus near Grant Street. However, these 10 concepts were eliminated due to design constraints and impacts at the Minnesota Avenue intersections with Benning Road and Grant Street. The EA notes that a streetcar stop platform on Minnesota Avenue north of the intersection could negatively affect overall traffic flow or create new safety issues for pedestrians. Projected ridership would be higher with a Benning Road terminal and Blue/Silver line users would have a single transfer to access the H Street corridor.	2.2.1
77	Remetter Freeman		I'm concerned because I was at the first meeting, when you decided that the Metro would come to Grant Street, turn around, and go back and go up Benning Road. You have more people on this side who utilize the Metro. So to me, going across there at Benning Road, up to the other area, seems to be a little far to me. The people who are on this side would come to Metro, get on the streetcar, go up and go up H Street. To me, it would be more feasible to come here and do it than to go to the area where you've -- and then you wouldn't have all this that you've got to do and change and all. I think it should come right here to Grant Street and go back.	Public Hearing Testimony	Alternatives Development	Chapter 2, Section 2.2.1 of the final EA describes 15 potential concepts, including 10 concepts that routed the streetcar to the Minnesota Avenue Metrorail Station with a terminus near Grant Street. However, these 10 concepts were eliminated due to design constraints and impacts at the Minnesota Avenue intersections with Benning Road and Grant Street. The final EA notes that a streetcar stop platform on Minnesota Avenue north of the intersection could negatively affect overall traffic flow or create new safety issues for pedestrians. Projected ridership would be higher with a Benning Road terminal and Blue/Silver line users would have a single transfer to access the H Street corridor.	2.2.1
78	Effie Simmons		If you are going to extend the streetcar, please take it all the way to the D.C. line. Thank you.	Public Hearing Comment Sheet	Alternatives Development	The study limits for the proposed action are Oklahoma Avenue to East Capitol Street. Extending the streetcar to the DC line is not being considered as part of the proposed action; however, the currently proposed design would allow such an extension in the future. A separate environmental review process would have to be conducted for any further extension.	
79	Bradley Green		Bicycles should be accommodated on the streetcars.	Public Hearing Comment Sheet	Bicycle Accommodations	The streetcar is designed to accommodate bicycles on board. The rules regarding bicycles on the existing H Street/Benning line would be the same for the proposed streetcar extension. Bicycles are permitted on the streetcar during off-peak hours only.	
80	Drew Carlisle		The streetcar needs to be built in the median. If we learned anything from H Street, it actually made it more dangerous for cyclists there...But if you put it in the curb lane, cyclists are going to be at a disadvantage, and I don't think that's the way we want to go. MoveDC, the plan for moving pedestrians and cyclists and finding other types of transportation for D.C., have said that it's Tier 1 priority to extend the path from Kingman Island all the way to East Capitol Street, pretty much right along the path that we're talking about the development of this streetcar... Talking about bikes, one more thing, Benning Road is the only place where a cyclist can go from west of the Anacostia River to east of the railroad tracks between Pennsylvania Avenue and	Public Hearing Testimony	Bicycle Accommodations	The final EA describes impacts associated with each Build Alternative. Alternative 2, the median alignment, reduces the potential for conflict between bicyclists and the streetcar since streetcar tracks would be in the median.	2.3.3, 2.3.4, 4.2.5

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
			Bladensburg. That's way too far, and it restricts access to everybody here east of the river.				
81	David Anspacher		Where pedestrian activity is anticipated to be higher, protected bike lanes and a sidewalk are needed. To appeal to all users, the protected bike lanes should be raised, offset at least 5 ft from the roadway, and at least 8 feet wide (if two-way).	Email	Bicycle Accommodations	As described in Section 4.2.5, Pedestrian and Bicycle Network, ADA-compliant sidewalks or shared-use paths would be implemented in the study area. Sidewalks and shared use paths are 6-feet to 10-feet wide as indicated in Figures 2-20 to 2-22 and Figures 2-26 to 2-28. Appendix B cross sections display sidewalk, shared-use path, and lane widths. Providing both sidewalks and protected bicycle lanes throughout the entire study area will be evaluated in project design.	Figures 2-20 to 2-22 and Figures 2-26 to 2-28; Appendix B
82	Drew Carlisle		One of the stated purposes here was to make this a safer environment for pedestrians and for cyclists.	Public Hearing Testimony	Bicycle Accommodations	The purpose and need for the proposed action includes "improve[ing] safety conditions and operations for both motorized and non-motorized access." The final EA describes impacts associated with each Build Alternative for motorized and non-motorized modes. Pedestrian and bicycle safety improvements for design and control are addressed in the description of alternatives in Chapter 2, Section 2.3.1 and 2.3.3. The median alignment reduces the potential for conflict between bicyclists and the streetcar.	2..3.1, 2.3.3, Table 2-4
83	Greg Rhett		The first question I asked was how on Earth you all are going to move the streetcar in an eastward direction without first replacing the Whitlock Bridge. Let me stop there. You all are referring to it as the Benning Road Viaduct Bridge. It's actually the Lorraine Whitlock Memorial Bridge. Ms. Whitlock was a renowned community leader. Just like when people cross the Woodrow Wilson Bridge from Maryland to Virginia, when you're coming from west of the river to east of the river, please acknowledge that that's the Whitlock Bridge.	Public Hearing Testimony	Bridge Improvements	Replacement of the Whitlock Bridge is part of the proposed action. The final EA references the structures over DC-295 and the CSX Railroad as the Whitlock Bridge.	Global
84	Eddie Fendley		I'm hoping that DC will rebuild the Benning bridge over the Anacostia with dedicated bicycle lanes!	Email	Bridge Improvements	Bicycles would be accommodated on a multi-use path. The existing roadway structures over Kingman Lake and the Anacostia River would be modified to accommodate streetcar tracks. No change would be made to the existing multi-use path.	2.3.3, Appendix B
85	Avis Johnson		DO BUILD A NEW BRIDGE!	Public Hearing Comment Sheet	Bridge Improvements	Replacement of the Whitlock Bridge is part of the proposed action and is included with each Build alternative.	2.3.3, Appendix B
86	Peter Lloyd		I think the improvement of the bridge is very important, and the revitalization of the bridge is important...	Public Hearing Testimony	Bridge Improvements	Replacement of the Whitlock Bridge is part of the proposed action and is included with each Build alternative.	2.3.3, Appendix B
87	Rosa E. Lee		I have not had the opportunity to read the report or the plan, however the bridge has been neglected for years and with the new growth and development taking place in DC and this area, especially, there is a need to upgrade and improve means of getting around.	Public Hearing Comment Sheet	Bridge Improvements	Replacement of the Whitlock Bridge is part of the proposed action and is included with each Build alternative.	2.3.3, Appendix B

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
88	David Hanley		I am concerned that any construction would impact the accessibility to the DC Eagle located at 3701 Benning Road, NE, Washington, DC and is only accessible via the service road that runs parallel to the Benning Road Bridge.	Public Hearing Comment Sheet	Construction Impacts	Access to the service road serving the DC Eagle business will not be obstructed during or after construction.	
89	R. Bradley Austin		The biggest concern related to construction is the potential impact construction will have on existing bus stops. I will note any electrical powering equipment should be installed away from any residential areas, particularly in the River Terrace neighborhood, where there are adequate locations just before and after the neighborhood. But as long as adequate planning goes into mitigating any construction related pollution and impact to existing public transit options, I have no objections.	Email	Construction Impacts	Construction impacts and potential mitigation measures are described in the final EA, Chapter 4, Section 4.12, Construction Impacts and in Appendix D, Maintenance of Traffic Concept Plan. Bus stop access will be maintained through the construction process. Electrical powering equipment would be operated during the defined hours each work day to reduce impacts to residential areas. To mitigate pollution, exhaust emissions and fugitive dust would be controlled via measures such as wetting, paving, landscaping, traffic management techniques, and water sprays. Chapter 2, Alternatives Considered, describes locations of traction power substations (TPSS), which supply electrical power for the streetcar. Impacts and proposed mitigation are addressed in Chapter 4, Environmental Consequences.	4.12, Appendix D
90	Greg Rhett		Secondly, my question is if we spent -- the city -- over \$200 million on the current streetcar that goes a couple of miles to nowhere, where exactly did that money go? No one has the answer. Now we're putting another -- more than \$100 million to bring it eastward. As my civic leader said, there's no way improving this intersection is \$100 million. Where's that money really going?	Public Hearing Testimony	Cost/Finance	The final EA describes estimated capital costs in Chapter 2, Section 2.4 and in Appendix C, Cost Estimates. Estimated capital cost for roadway and bridge improvements is approximately \$116 to 118 million for Alternatives 1 and 2. This includes upgraded or new pavement, curbs, sidewalks, structures, streetscape, and traffic signals. Other costs are for design, engineering, and maintenance of traffic during construction. To accommodate streetcar tracks bridges over Kingman Lake and the Anacostia River require modification. The Whitlock Bridge would be replaced due to its poor condition. Alternative 1 streetcar capital costs are approximately \$61 to \$62 million for the wired and wireless options, respectively. Alternative 2 streetcar capital costs are approximately \$59 million for both wired and wireless options. Streetcar capital costs include track and switches, signals, propulsion elements, traction power substations, vehicles, propulsion equipment storage, and right-of-way.	2.4, 4.16, Table 4-25, Appendix C
91	Russell Klein		Financial commitments to this project ought not, must not detract from other financial opportunities.	Public Hearing Comment Sheet	Cost/Finance	Local project funding commitments are approved by city council. The proposed action addresses environmental impacts with the objective of achieving environmental clearance to proceed to later phases of engineering and design, contingent upon approved funding.	
92	Rochelle Gray		What cost data is available to show the viability of existing H Street Streetcar?	Public Hearing Comment Sheet	Cost/Finance	Capital and Operating and Maintenance cost data is available in the final EA. Chapter 2, Section 2.4 summarizes capital costs for the roadway and streetcar and shows annual operating cost for the streetcar extension. Appendix C, Cost Estimates, provides more detailed cost information.	2.4, Appendix C

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
93	Rochelle Gray		I do not think it takes more than \$102 million to make an intersection safe. That's ridiculous.	Public Hearing Testimony	Cost/Finance	<p>Capital costs include not only safety improvements at the intersection Benning Road and Minnesota Avenue but also roadway improvements in the study area. These costs include a new Whitlock Bridge as well as new pavement, curbs, sidewalks, and drainage elements on Benning Road between Oklahoma Avenue and East Capitol Street. Other capital costs included in the roadway estimate are for the bridges over Kingman Lake and the Anacostia River, traffic signals, landscaping, bus stops. The estimate also includes design and construction related cost for engineering and maintenance of traffic during construction.</p> <p>Capital Cost data is available in the final EA, Chapter 2, Section 2.4, and in Appendix C, Cost Estimates. The estimate for roadway and bridge-related improvement are approximately \$116 million for Alternative 1 and to \$118 million for Alternative 2.</p>	2.4, Appendix C
94	David Belt		The Metro, as well as their own feasibility studies, which shows that it is definitely not feasible to bring it down Benning Road, being that Benning Road is only two lanes either way, one lane being 10 foot wide, the other lane being 11 foot wide. The streetcar needs a minimum of 11 feet, 11 foot wide lane, which makes it as one or the other lane. Either way, they would still have to widen the street. The street is not wide enough to accommodate the streetcar. They would have to widen it from two to four feet, which is not feasible because the sidewalks are already narrow...and the streetcar just physically would not fit. It wouldn't fit.	Public Hearing Testimony	Lane Width	The existing cross section of Benning Road is approximately 64 to 66 feet wide with two 11-foot and two 10-foot lanes, plus a 4 to 6 foot buffer and 6-foot sidewalk on each side of the roadway. Benning Road would be widened for either Build Alternative to provide one 12-foot and one 11-foot lane in each direction. New 6-foot sidewalks with a 4-foot buffer would be implemented. This widening would occur within the existing right-of-way. To accommodate the widened lanes as described above, the section would be widened to 68 feet, one to two feet on each side of the roadway.	Appendix B
95	Greg Rhett		Thirdly, there is no way you can bring that streetcar up Benning Road towards the Benning Metro Station. There are homes on both sides of the road. You can't widen that thoroughfare.	Public Hearing Testimony	Lane Width	The existing cross section of Benning Road is approximately 64 to 66 feet wide with two 11-foot and two 10-foot lanes, plus a 4 to 6 foot buffer and 6-foot sidewalk on each side of the roadway. Benning Road would be widened for either Build Alternative to provide one 12-foot and one 11-foot lane in each direction. New 6-foot sidewalks with a 4-foot buffer would be implemented. This widening would occur within the existing right-of-way. To accommodate the widened lanes as described above, the section would be widened to 68 feet, one to two feet on each side of the roadway.	Appendix B
96	Greg Rhett		It put a lot of businesses underwater, where the ward council member had to give out grants to keep some businesses alive. We don't have businesses that can survive that type of disruption. Finally, the last business that you will kill is Denny's; the world renowned Ward 7 Denny's would not survive. I don't want you all to have your name on the D.C. agency that killed Denny's.	Public Hearing Testimony	Neighborhood & Community Facilities Impacts	Maintenance of Traffic (MOT) plans will be developed during project design to mitigate impacts to local businesses during construction. Programmatic resources from Deputy Mayor for Planning and Economic Development (DMPED) and Department of Small and Local business Development (DSLBD) may be used to support local businesses as funding becomes available.	4.12.3.2.

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
97	Chris Plano		Have any considerations been made to preventing displacement? Arlington proposed using TIF to find affordable housing and preserve existing affordable housing along the proposed Columbia Pike Streetcar. This approach could be applied to the Benning Road Streetcar.	Public Hearing Comment Sheet	Neighborhood & Community Facilities Impacts	In the final EA, Chapter 4, Section 4.14.2.2, describes socioeconomic consequences for the Build Alternatives and notes: "Residents in these corridors would benefit from reduced transportation costs and greater access to jobs. These benefits would offset increased housing costs for some households. However, the District's affordable housing options and tax-exemption programs will likely continue to be available to protect low income residents of the community from increased land values when appropriate."	4.14.2.2
98	Kevin Hill		Adequate concerns include: -Neighborhood concerns (... SHPO locations to be conserved).	Public Hearing Comment Sheet	Neighborhood & Community Facilities Impacts	The final EA addresses and complies with U.S. Department of Transportation Act of 1966, 49 USC 303(c), Section 4(f) regulating the preservation of historic properties.	4.4
99	Rochelle Gray		We need economic development, and then a streetcar. Don't give me an example of H Street. We are not H Street. We are a residential community. We like our area.	Public Hearing Testimony	Neighborhood & Community Facilities Impacts	The final EA in Chapter 4, Section 4.13.2.2 describes potential indirect impacts associated with development and redevelopment in the area. The EA notes: "The FTA Urban Circulator Grant Application for this proposed action (DDOT, 2010) found that economic impacts of the proposed action include the short-term increases in jobs and wages associated with construction and the long-term jobs and income from on-going streetcar operations. The economic impacts analysis considers the direct impacts of employment for streetcar construction and operations as well as the indirect impacts on the economy and local jobs as the streetcar related wages are spent in the local economy."	4.13.2.2
100	David Belt		As far as all these businesses that are clamoring to get over there in Ward 7, we've got two apartment buildings that pretty much killed that. So this may be -- which has taken such a huge area in one of our most economically -- one of the best places for economic development at Benning and East Capitol. Then right at Benning and Minnesota Avenue, right across the street from the library, you've got another low income public housing project that they're building right now. Right now, they've pretty much killed any economic development.	Public Hearing Testimony	Neighborhood & Community Facilities Impacts	The final EA in Chapter 4, Section 4.13.2.2 describes potential indirect impacts associated with development and redevelopment in the area. The EA notes: "The FTA Urban Circulator Grant Application for this proposed action (DDOT, 2010) found that economic impacts of the proposed action include the short-term increases in jobs and wages associated with construction and the long-term jobs and income from on-going streetcar operations. The economic impacts analysis considers the direct impacts of employment for streetcar construction and operations as well as the indirect impacts on the economy and local jobs as the streetcar related wages are spent in the local economy."	4.13.2.2
101	Greg Rhett		It says it'll be a little bit of noise. I was here when they built the original one. That was a lot of noise.	Public Hearing Testimony	Noise	The final EA describes noise impacts from construction in Chapter 4, Section 4.12. Noise mitigation is described in Section 4.12.3.	4.12 and 4.12.3
102	Russell Klein		Residents along Benning Road, east of Minnesota Avenue should not suffer months of... noise...	Public Hearing Comment Sheet	Noise	The final EA describes noise impacts from construction in Chapter 4, Section 4.12. Noise mitigation is described in Section 4.12.3.	4.12 and 4.12.3

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
103	Avis Johnson		Do not bring this streetcar over the Benning Road Bridge. It is too big, not needed and not wanted.	Public Hearing Comment Sheet	Oppose Streetcar	The streetcar can operate within existing rights-of-way. In the final EA, vehicle dimensions, lane dimensions, and streetcar operating characteristics are described in Chapter 2, Section 2.3.3.3. The streetcar dimensions are 8 feet wide by 66 feet long, which is comparable to an articulated bus which is 8.5 feet wide and 60 feet long.	2.3.3.3
104	Juanita Beasley		All of the benefits of this trolley can be replaced with an express bus. It'll do the exact same thing without the congestion and the construction.	Public Hearing Testimony	Oppose Streetcar	WMATA currently operates the limited-stop rush-hour Metrobus Route X9 from Capitol Heights Metrorail Station via Benning Road and H Street to Metro Center. Chapter 1, Section 1.4.4, describes operation issues for the X Line routes which experience high ridership, crowding, and schedule non-adherence. These characteristics indicate the need for an additional transit service to increase mobility and accessibility by improving transit operations and options. The streetcar would be implemented in addition to current service.	1.4.4
105	Rosa E. Lee		I am against extending the streetcar mode of transportation down Benning Road to the Benning Road metro station. There are too many neighborhoods in this area where the residents depend on public transportation to get to work and complete daily life activities. The slow moving streetcar would not serve their needs and in fact would be a dis-service to these residents. These residents pay taxes and have a right to adequate public transportation. Also, the streetcar would be destructive to residents and businesses already in existence on Benning Road. Do not bring the street car across the bridge. Please reconsider your decision.	Letter	Oppose Streetcar	The purpose of the proposed action is to increase mobility and accessibility by improving transit operations and options. The streetcar would be implemented in addition to current service.	1
106	Juanita Sizemore		I am in opposition to the rail car that is being proposed in our area.	Email	Oppose Streetcar	Comment noted.	
107	George Barsky		<p>While considering east side improvements I believe the DC Streetcar should rightfully be located at the front of Union Station where they always were historically. There is no good reason for the streetcar not to be at the front of the station as though it were a shameful bit of transportation to be hidden on the bridge. If all other street traffic is allowed at the front so should the streetcar.</p> <p>The only thing missing is the official will, otherwise it would have been done originally. Engineering the change is not the problem. With the renovation plans for the station and vicinity the streetcar can and should be included to the front. The DC Streetcar should be treated with pride and not embarrassment. It was built for public use and convenience, not an oddity to be kept out of sight. It belongs properly at the front and showcased like any other DC monument.</p> <p>Let's forget all the mundane excuses and make it happen.</p>	Email	Other	The final EA addresses the proposed action from Oklahoma Avenue to the Benning Road Metrorail Station. A streetcar alignment in the Union Station area is not part of this EA.	

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
108	Rochelle Gray		We have major problems on 295. I see everything else being addressed except for that. This intersection at Minnesota and Benning would not be such a hazard if 295 were revamped to allow people to exit the city under the underpass and go where they need to go. But many people have to come over the Benning Road Bridge to come out Minnesota, just to go out Kenilworth Avenue. That's the biggest problem, and that's creating the safety hazard for the pedestrians. The streetcar, as proposed, does not seem to be able to solve that problem. I think we need to look at it.	Public Hearing Testimony	Other	Modification of DC-295 is not part of this EA; however the proposed action would not preclude future safety and traffic improvements. Any proposed improvements to DC-295 would be addressed in a separate study process.	
109	Dottie Thomas		Hello. I live at 42nd and Benning northeast. I would like to request that we have a corner mailbox, drop off mail on the corner, the blue ones. We need one of those. We need one between Minnesota and 42nd. There's a secondary post office, and that's too far to go to drop the mail. I did hear, when I moved over there, that the young people, young adults, were putting liquids down in the boxes on the corner. That's why they removed them. But maybe things are changing now, and we could have one there again.	Public Hearing Testimony	Other	This EA focuses on roadway and transportation improvements.-	
110	Kevin Hill		Adequate concerns include: -Neighborhood concerns (parking...)	Public Hearing Comment Sheet	Parking	The final EA describes in Chapter 4, Section 4.2.3, parking impacts associated with each Build Alternative. Existing on-street parking in the study area would be eliminated with Build Alternative 1, the curbside alignment streetcar, whereas Build Alternative 2, the median alignment streetcar, would not result in a net loss of parking in the study area. Section 4.2.3.3 describes parking mitigation measures for Build Alternative 1. For Build Alternative 1, parking bays will be located along Benning Road east of Minnesota Avenue to replace 222 of the 262 existing on-street parking spaces in this segment of the study area. Replacement parking would be provided by widening the roadway on both sides. The proposed on-street parking would enhance the existing conditions by providing unrestricted parking, whereas current on-street parking is limited to off-peak hours only.	4.2.3, 4.2.3.3, Figure 4-4
111	Jim Smailes		Loss of residential parking between 42nd and 44th Street will deny local residents the parking they need. Is there an alternative parking lot proposed for them?	Public Hearing Comment Sheet	Parking	The final EA describes in Chapter 4, Section 4.2.3, parking impacts associated with each Build Alternative. Existing on-street parking in the study area would be eliminated with Build Alternative 1, the curbside alignment streetcar, whereas Build Alternative 2, the median alignment streetcar, would not result in a net loss of parking in the study area. Section 4.2.3.3 describes parking mitigation measures for Build Alternative 1. For Build Alternative 1, parking bays will be located along Benning Road east of Minnesota Avenue to replace 222 of the 262 existing on-street parking spaces in this segment of the study area. Replacement parking would be provided by widening the roadway on both sides. The proposed on-street parking would enhance the existing	4.2.3, 4.2.3.3, Figure 4-4

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
						conditions by providing unrestricted parking, whereas current on-street parking is limited to off-peak hours only.	
112	Juanita Beasley		<p>...without taking away parking. We're families on this side. We're not restaurants. We're not bars. We're not hipsters. We go to work at different hours. What's on peak for you guys is not on peak for a lot of us. We're service workers, some of us. We need to park in front of our house during those so called trolley hours...</p> <p>Parking tickets I have yet to see the trolley drive down H Street, as it is now, without being preceded by a ticket agent and a tow trucks, and that's in both directions. It's at night; it's at day; it's whenever it's running. So now, we're going to have to foot that bill for a trolley, and who is this trolley for?</p>	Public Hearing Testimony	Parking	<p>The final EA describes in Chapter 4, Section 4.2.3, parking impacts associated with each Build Alternative. Existing on-street parking in the study area would be eliminated with Build Alternative 1, the curbside alignment streetcar, whereas Build Alternative 2, the median alignment streetcar, would not result in a net loss of parking in the study area.</p> <p>Section 4.2.3.3 describes parking mitigation measures for Build Alternative 1. For Build Alternative 1, parking bays will be located along Benning Road east of Minnesota Avenue to replace 222 of the 262 existing on-street parking spaces in this segment of the study area. Replacement parking would be provided by widening the roadway on both sides. The proposed on-street parking would enhance the existing conditions by providing unrestricted parking, whereas current on-street parking is limited to off-peak hours only.</p>	4.2.3, 4.2.3.3, Figure 4-4
113	David Belt		<p>Because it's going through -- this is the only area on the whole streetcar line, even after it's built up, where it's going through a strictly residential neighborhood. I mean strictly residential both sides. So you've got people who park their cars, especially on weekends. You've got at least two churches right there on Sundays. That means they would lose all their parking, as well as the few businesses that are there.</p>	Public Hearing Testimony	Parking	<p>The final EA describes in Chapter 4, Section 4.2.3, parking impacts associated with each Build Alternative. Existing on-street parking in the study area would be eliminated with Build Alternative 1, the curbside alignment streetcar, whereas Build Alternative 2, the median alignment streetcar, would not result in a net loss of parking in the study area.</p> <p>Section 4.2.3.3 describes parking mitigation measures for Build Alternative 1. For Build Alternative 1, parking bays will be located along Benning Road east of Minnesota Avenue to replace 222 of the 262 existing on-street parking spaces in this segment of the study area. Replacement parking would be provided by widening the roadway on both sides. The proposed on-street parking would enhance the existing conditions by providing unrestricted parking, whereas current on-street parking is limited to off-peak hours only.</p>	4.2.3, 4.2.3.3, Figure 4-4
114	Juanita Sizemore		<p>Right lane going towards Minnesota Avenue Metro Station should not have cars park there during rush hour or 9-5 so emergency vehicles and buses can flow thru smoothly.</p>	Public Hearing Comment Sheet	Parking	Comment noted.	

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
115	David Anspacher		<p>A high-quality walking and bicycling environment is needed along Benning Road.</p> <p>Where pedestrian activity is anticipated to be lower (west of Minnesota Avenue), a multi-use path is appropriate. To appeal to all users, the path should be at least 10 feet wide with a minimum 5 ft wide buffer from traffic.</p> <p>Where pedestrian activity is anticipated to be higher, protected bike lanes and a sidewalk are needed. The sidewalk should be a minimum of 6 feet wide in general, but a minimum of 8 ft wide in commercial areas. Vertical and horizontal separation between the sidewalk and the protected bike lanes are needed</p>	Email	Pedestrian Accommodations	In the final EA, Chapter 4, Section 4.2.5, describes enhancements to the pedestrian and bicycle network. Elements include improved crosswalks at 36 th Street, new crosswalks at streetcar stops, pedestrian signals, and ADA-compliant sidewalks. A shared-use path is identified adjacent to the eastbound lanes of Benning Road between Oklahoma and Minnesota Avenues.	4.2.5
116	Wanda Aikens		[My priorities for the corridor and streetcar are] cultural identification of all persons living in area and using area, improvement with true community support, safety improvements to walks for homeowners, visitors and seniors, [improved] peak times, safer pathways, and reinforcement.	Public Hearing Comment Sheet	Pedestrian Accommodations	The commenter's priorities are commensurate with Chapter 1, Purpose and Need, which notes the needs are to "improve transportation infrastructure conditions; enhance safety and operations along the corridor and at key intersections; enhance and install pedestrian and bicycle facilities; and extend H/Benning Streetcar transit service."	1
117	Rochelle Gray		Like my community partner, Mr. Russell Klein from Parkside, mentioned, DDOT has not been very responsive to our requests for assistance with our highways and our byways. To make these plans, like someone said, it sounds like a done deal. We have everything laid out here, everything. All the officials here, "Please come give comments," but we know what's going to happen. This is what typically happens with Ward 7 residents. You come; you give us a plan and tell us to take it. We say, "We don't want it; we don't want it," and then we're overruled. It is embarrassing. The residents of Ward 7 should not accept this if this is not what they want, but you've got to come out, and you've got to want to hear. Don't schedule a meeting for formality because that's what this is, to say, "We gave them a chance; 50 people said no; 20 people said yea." That's all it is, and you move forward. It's just so unfair.	Public Hearing Testimony	Public Involvement	Since 2012, outreach to the communities potentially affected by the proposed roadway and streetcar transportation improvements has included newsletters, a project website, two public meetings, and a public hearing. Public Involvement efforts are further described in Chapter 5, Public and Agency Coordination. A public meeting will be held after release of the final EA for public review.	5

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
118	Wanda Aikens		It's one thing to say that you're bringing in change, but let me ask you this: if you live somewhere, including here, and you are happy with where you live at, don't you want some sense of maintaining what you have? I want you to think about that because all the changes that people are suggesting aren't necessarily resident changes. Because a lot of them have been changes I hear from other people, Greg, but I hear very few when I walk down the street. I'm going to tell you the truth. The reason a lot of neighbors aren't here, they were not correctly notified. I'm telling you the truth. If you want people who live here, put them on your top priority and give them more access to what will be voted on. We vote for the president and everything else. I don't want you all to have two votes or three votes. I want us to have equal voting on what is maintained for the people that have not only lived here, we pay our taxes here. We have also helped to build the area up, even before the government decided to put the bridge over here. I'm just asking you please, give us some credit here. Please think of the people like myself that lived over here for not 10-20 -- for centuries, okay? We want to stay living here. We want the responsibility and the respect that we can make good decisions.	Public Hearing Testimony	Public Involvement	Since 2012, outreach to the communities potentially affected by the proposed roadway and streetcar transportation improvements has included newsletters, a project website, two public meetings, and a public hearing. Public Involvement efforts are further described in Chapter 5, Public and Agency Coordination. A public meeting will be held after release of the final EA for public review.	5
119	Mike and Juanita Johnson		I wish this was a sincere effort to get input from the community that actually lives here. Looks like they already have their minds made up.	Public Hearing Comment Sheet	Public Involvement	Since 2012, outreach to the communities potentially affected by the proposed roadway and streetcar transportation improvements has included newsletters, a project website, two public meetings, and a public hearing. Public Involvement efforts are further described in Chapter 5, Public and Agency Coordination. A public meeting will be held after release of the final EA for public review.	5
120	Robyn Jackson		The presentation speaker was difficult to hear and he used terminology not easily understood by the public... I think more communication (one-on-one) with residents along Benning Road is needed so that they understand the impact directly in front of their homes. Maybe an education on Public Space.	Public Hearing Comment Sheet	Public Involvement	Since 2012, outreach to the communities potentially affected by the proposed roadway and streetcar transportation improvements has included newsletters, a project website, two public meetings, and a public hearing. Public Involvement efforts are further described in Chapter 5, Public and Agency Coordination. A public meeting will be held after release of the final EA for public review.	5
121	Justin Warren		There is a lack of vision from residents—we need the area to develop! I didn't see Councilwoman Alexander here, unless she was here before 7pm when I arrived.	Public Hearing Comment Sheet	Public Involvement	Comment noted. The councilmember's name was not on the sign-in sheet.	
122	Chidi Akoma		Next time stream [the public hearing] live.	Public Hearing Comment Sheet	Public Involvement	Comment noted.	

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
123	Bradley Heard		Overhead wire technology will be too destructive to the neighborhood, given all the required tree removal.	Public Hearing Comment Sheet	Street Trees	Where trees must be removed, the DDOT Urban Forestry Administration (UFA) as the certified arborist would replace street trees removed within the right-of-way as part Standard Specification 608.07 Tree Protection and Replacement, which requires a diameter breast-height (DBH) inch per DBH inch replacement. Mitigation for canopy loss is addressed in the design phase and will meet current District and DDOT standards and regulations.	4.5.3, 4.6.3.3
124	David Belt		[My concern is] the tree line—that they would have to chop down all the trees on Benning Road.	Public Hearing Testimony	Street Trees	Where trees must be removed, the DDOT Urban Forestry Administration (UFA) as the certified arborist would replace street trees removed within the right-of-way as part of Standard Specification 608.07 Tree Protection and Replacement, which requires a diameter breast-height (DBH) inch per DBH inch replacement. Mitigation for canopy loss is addressed in the design phase and will meet District and DDOT standards and regulations.	4.5.3, 4.6.3.3
125	Greg Rhett		You're killing all of the tree canopy for the entirety of Benning Road [with overhead wires]. This is not portrayed accurately in the study.	Public Hearing Testimony	Street Trees	Where trees must be removed, the DDOT Urban Forestry Administration (UFA) as the certified arborist would replace street trees removed within the right-of-way as part of Standard Specification 608.07 Tree Protection and Replacement, which requires a diameter breast-height (DBH) inch per DBH inch replacement. Mitigation for canopy loss is addressed in the design phase and will meet District and DDOT standards and regulations.	4.5.3, 4.6.3.3
126	Russell Klein		Residents along Benning Road, east of Minnesota Avenue should not suffer [from a] lack of tree coverage.	Public Hearing Comment Sheet	Street Trees	Where trees must be removed, the DDOT Urban Forestry Administration (UFA) as the certified arborist would replace street trees removed within the right-of-way as part of Standard Specification 608.07 Tree Protection and Replacement, which requires a diameter breast-height (DBH) inch per DBH inch replacement. Mitigation for canopy loss is addressed in the design phase and will meet District and DDOT standards and regulations.	4.5.3, 4.6.3.3
127	Norman Comfort		How will streetcars [service] respond to emergency-blocked streets if a detour is needed? While the bus could go around and go somewhere else, a streetcar would be stopped. Will the people be able to get off? Would it be a safe spot for them to get off? What would the situation be like? What about the streetcars are more efficient than busses? If primary power is lost and the streetcars need to be moved, is there a secondary power in the streetcar to move it to a safe place to unload if unloading is needed or off to the side? How efficient are these streetcars going to be when ice and snow get on the lines?	Public Hearing Testimony	Streetcar Operations	Should the streetcar line be blocked or in the case of breakdowns or health issues that may stop streetcar service, a bus bridge would be implemented. A bus bridge can be implemented as done when segments of Metrorail are closed. Compared to very frequent daily bus service, overall costs and efficiency for streetcars can be better than buses if vehicles can carry more passengers at and do so less frequently. If primary power is lost, streetcars can move limited distances under auxiliary battery power. Streetcars can operate in ice and snow conditions as vehicles can be designed or equipped with sanding capability, integral snow plows, and scrapers.	2.3.3.3, 2.3.3.4, 2.3.3.5, 2.3.3.6, 2.3.3.7

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
128	Norman Comfort		How will streetcars handle emergency blocked street when there is a need to detour? How are streetcars more efficient than buses? If primary power is lost, is there any secondary power in the streetcar to move it to a safe place to unload if unloading is desired or needed? How efficient are these streetcars going to be when ice and snow get on the lines?	Public Hearing Comment Sheet	Streetcar Operations	Should the streetcar line be blocked or in the case of breakdowns or health issues that may stop streetcar service, a bus bridge would be implemented. A bus bridge can be implemented as done when segments of Metrorail are closed. Compared to very frequent daily bus service, overall costs and efficiency for streetcars can be better than buses if vehicles can carry more passengers at and do so less frequently. If primary power is lost, streetcars can move limited distances under auxiliary battery power. Streetcars can operate efficiently in ice and snow conditions as vehicles can be designed or equipped with sanding capability, integral snow plows, and scrapers.	2.3.3.3, 2.3.3.4, 2.3.3.5, 2.3.3.6, 2.3.3.7
129	Jim Smailes		Non-overhead wiring propulsion analysis in the E.A. is obsolete. Newer batter technology and super capacitors should be should be examined. Pepco power line conflict on Benning Road mentioned by a citizen's comment but not mentioned in E.A. Boards.	Public Hearing Comment Sheet	Streetcar Propulsion	The final EA addresses continuous power supply, battery, and supercapacitor options. All are feasible technologies. A wired option could be implemented along Benning Road. Given PEPCO power lines, the location of wire for streetcar service and mitigation of conflicts with utilities will be determined during project design.	2.3.3.5, 4.7
130	Bradley Heard		More consideration should be given to in-ground/ underground propulsion. Overhead wire technology will be too destructive to the neighborhood... If it's good enough for Georgetown to eliminate overhead wires, it should be good enough for Ward 7.	Public Hearing Comment Sheet	Streetcar Propulsion	Proven technologies have been identified for potential off-wire operation. A hybrid propulsion option comprising batteries and supercapacitors with overhead charging at stop is evaluated in the final EA.	2.3.3.5
131	Bradley Green		I support battery propulsion only if it has a proven record of reliability.	Public Hearing Comment Sheet	Streetcar Propulsion	Proven technologies have been identified for potential off-wire operation. A hybrid propulsion option comprising batteries and supercapacitors with overhead charging at stops is evaluated in the final EA.	2.3.3.5
132	R. Bradley Austin		I have no objection to using traditional, tried-and-true wired systems throughout the Benning Road Extension, especially considering that there is no prohibition on DDOT installing such a system in the proposed study area.	Email	Streetcar Propulsion	Comment noted.	2.3.3.5
133	R. Bradley Austin		I would strongly encourage the project team to look at turning the streetcar stops into joint streetcar & bus stops to allow riders to choose whichever option is available to them first. I recognize this may require some cooperation on the part of DDOT and WMATA, but it would be supremely beneficial to all riders. At weeklong service with 10-minute headways this isn't such a horrible thing to not include, but it may be something to consider for the future.	Email	Streetcar Stops	Streetcar stop platforms require a 14-inch height to allow level boarding with the floor of the streetcars. Buses require typical curb height of 6 to 8 inches. Therefore, streetcar and bus stops cannot be collocated. However, streetcar and bus stop locations are coordinated to allow convenient transfers and to eliminate delays. Configuration concepts of adjacent streetcar stop platforms and bus stops are displayed in the final EA, Figures 2-22 and 2-28.	Figures 2-22, 2-28
134	Bradley Heard		Placement of the streetcar in the median would be preferable to a curbside alignment.	Public Hearing Comment Sheet	Support Build Alternative 2	Comment noted. The final EA evaluates both curbside and median alignments. The median alignment results in fewer overall impacts.	4.16
135	R. Bradley Austin		I want to also encourage the project leaders to actively pursue build option #2/Concept#7, which would keep the streetcar near the median, especially given the unique on-off ramps at	Email	Support Build Alternative 2	Comment noted. The final EA evaluates both curbside and median alignments. The median alignment results in fewer overall impacts..	4.16

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
			Benning Road and DC-295.				
136	Drew Carlisle		If you're going to make it safer, we have to go with Alternative 2.	Public Hearing Testimony	Support Build Alternative 2	Comment noted. The final EA evaluates both curbside and median alignments. The median alignment results in fewer overall impacts..	4.16
137	Michael Solem		In order of preference, I support Build Alternative 2 and Build Alternative 1.	Email	Support Build Alternative 2	Comment noted. The final EA evaluates both curbside and median alignments. The median alignment results in fewer overall impacts..	4.16
138	Rochelle Gray		No Build choice. What are the advantages of the streetcar vs. metro bus?	Public Hearing Comment Sheet	Support No Build	The final EA in Chapter 4, Section 4.13.2.2 describes potential indirect impacts associated with development and redevelopment in the area. The EA notes: "The FTA Urban Circulator Grant Application for this proposed action (DDOT, 2010) found that economic impacts of the proposed action include the short-term increases in jobs and wages associated with construction and the long-term jobs and income from on-going streetcar operations. The economic impacts analysis considers the direct impacts of employment for streetcar construction and operations as well as the indirect impacts on the economy and local jobs as the streetcar related wages are spent in the local economy."	4.16
139	Rochelle Gray		My choice is no build. I am not in favor of the streetcar.	Public Hearing Testimony	Support No Build	Comment noted	4.16
140	Eddie Fendley		I'm hoping that DC will promptly extend streetcar to Benning Metrorail station	Email	Support Project - General	Comment noted.	4.16
141	Justin Warren		<p>Good evening, everybody. I just wanted to say, as a Ward 7 resident, I would like to see the streetcar be extended down Benning Road, all the way to the Benning Road Metro Station. My reasoning for it is since moving here, I noticed that there's a pretty stark difference between west of the Anacostia River and east of the Anacostia River.</p> <p>I believe the streetcar not only will give us access to the Red Line and to those areas over there where the Red Line is, but also will bring development, help bring grocery stores, restaurants, retail areas that are pretty prevalent west of the Anacostia, but not so much east of the Anacostia. Just as a Ward 7 resident, I would like to see that streetcar extended, along with the development that'll come with it. Thank you.</p>	Public Hearing Testimony	Support Project - General	Comment noted.	4.16

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
142	R. Bradley Austin		First I wish to relay my excitement about this project, I look forward to the day I am able to ride the streetcar all the way into Georgetown from my home in Northeast! I absolutely believe the project's stated purpose and need is true, there is a need for more transit options in this area, especially given the increasingly unreliable service of regional Washington Metropolitan Area Transit Authority (WMATA). Also, given that for many living west of the Anacostia Freeway (DC-295) and the CSX rail tracks, it is quite an inconvenience to get over to Minnesota Avenue, this would better allow access to the rest of the city.	Email	Support Project - General	Comment noted.	4.16
143	Scott Leonard		I don't live in the study area, but do live 1.5 blocks from the current H St Streetcar line. I've been in that neighborhood for 30 years, almost (1987). I am happy the streetcar line was built near my home. The overhead wires are no issue to me. The streetcars make much less noise, are much cleaner and drive less recklessly than the many local and intercity buses on H Street. I've also been happy about increased enforcement of parking laws on H Street, which makes all traffic move more smoothly. Also, the streetcar is much easier to board and much more ADA- friendly than the bus. I appreciate that local residents may have concerns, but in my neighborhood, in my opinion, the streetcar has been much more positive than negative.	Public Hearing Comment Sheet	Support Project - General	Comment noted.	4.16
144	Andrew Ahn		I am very happy to hear that the District Department of Transportation (DDOT) has released the environmental assessment (EA) for the streetcar extension to Benning Road Metro Station. I am fully supportive of this project because of its ability to bridge the gap between communities east of the river and the rest of the District. I hope you will be able to move forward with this project and start construction shortly after the EA has been finalized.	Email	Support Project - General	Comment noted.	
145	Bradley Green		I support the extension of the streetcar line to the Benning Road Metro Station. It will provide an important link between Benning Road Metro and Union Station Metro and points in between. Streetcars are an efficient, affordable, and high quality alternative to cars.	Public Hearing Comment Sheet	Support Project - General	Comment noted.	
146	Jane Anderson		I am writing in support of the DC Streetcar extension to Benning Metro. If extended, our neighbors would be more connected to the city and the Benning bridge could be re-done, allowing it to be more pedestrian friendly. Right now, it's extremely dangerous to walk over the bridge. Also, it would be an easy way to connect the community.	Email	Support Project - General	Comment noted.	

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
147	Justin Warren		<p>I support the extension of the DC street car on Benning Rd. to the Benning Rd. Metro Station. I can see nothing but positives that can come from this project after seeing the development that was spurred from the H Street/Benning Road Street Car. With this streetcar and the subsequent development that may follow no longer will there be a stark difference in the quality and appearance between West of the Anacostia River and East of the Anacostia River. I pray that a street car will provide East River residents more grocery stores, housing, retail, and restaurants options that are severely lacking in Ward 7. Not only will the street car spur economic development, but will also give Ward 7 residents more convenient access to the Metro Red Line and help to reduce traffic (my hope is that if the option is available, more people will ride instead of drive).</p> <p>I'm not sure if the majority of Ward 7 residents are in support of the street car extension, but if that is the case do not let the initial fear and lack of vision prevent this project from happening.</p>	Email	Support Project - General	Comment noted.	
148	Justin Warren		<p>Without the extension of the street car the development that is needed and deserved for Ward 7 residents will not take place. We as Ward 7 residents need to be honest with ourselves and realize that development will not come without the street car. H-street was not viable until the promise of the street car. Even if it has to stop at the Minnesota/Benning intersection, this project needs to happen. Bring on the Street Car.</p>	Email	Support Project - General	Comment noted.	
149	Kevin Hill		<p>I look forward to this development as long as adequate concerns are met.</p>	Public Hearing Comment Sheet	Support Project - General	Comment noted.	
150	Michael Solem		<p>As a D.C. resident since 2003, I am writing to express my support for the proposed Benning Road and bridges transportation improvements.</p> <p>Both of these build alternatives will bring much needed improvements to transportation and safety along the study corridor.</p>	Email	Support Project - General	Comment noted..	
151	Robyn Jackson		<p>I'm for the streetcar. Though I don't agree that it will contribute to economic development, it will provide access to jobs and a direct connection across the bridge.</p>	Public Hearing Comment Sheet	Support Project - General	Comment noted.	
152	Rosa E. Lee		<p>It is about time that the city did something to improve the Benning Road area in terms of safety and aesthetics. Yes, improve the bridge, accommodate pedestrians and bicyclists in a safer manner and improve the current mode of transportation</p>	Letter	Support Transportation Improvements	Comment noted..	

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
			at the (Orange Line and Blue line-Benning Road).				
153	Juanita Beasley		I think there are great things about the plan. Go ahead, widen the bridge, improve the intersection at Benning Road and Minnesota.	Public Hearing Testimony	Support Transportation Improvements	Comment noted..	
154	Kevin Hill		Adequate concerns include: -Traffic consideration (redevelopment of streets and thru-ways) -Neighborhood concerns (... travel disruption...)	Public Hearing Comment Sheet	Traffic Impacts	Implementation of the streetcar would not significantly impact intersection Level of Service (LOS) or delay in the study area. Traffic impacts related to construction, such as delays, lane closures, and reduced speed limits, are described in Section 4.12, Construction Impacts. During construction, at least one lane in each direction would remain open along Benning Road and the access to adjacent bus stops, residences, businesses, and community facilities would be maintained. Maintenance of Traffic plans will be developed as part of project design to mitigate any traffic impacts associated with construction.:	4.12
155	Russell Klein		Also, I am concerned with the northbound traffic for 295, coming from eastbound Benning Road. How will this project address this interchange?? Residents along Benning Road, east of Minnesota Avenue to 295 should not suffer months of congestion...	Public Hearing Comment Sheet	Traffic Impacts	Modification of DC-295 is not part of this EA; however, the proposed action would not preclude future safety and traffic improvements. Any proposed improvements to DC-295 would be addressed in a separate study process.	
156	R. Bradley Austin		Any concerns relating to traffic should be discounted as there are several nearby alternatives, such as New York Avenue, East Capitol Street, Pennsylvania Avenue SE and I-695 for commuters and residents to utilize.	Email	Traffic Impacts	Traffic volumes and impacts for primary study area roadways are documented in the final EA in Chapter 3, Section 3.2, Transportation and Traffic Operations; Chapter 4, Section 4.2.3, Environmental Consequences – Roadway Network; and Appendix E, Transportation Technical Memorandum.	3.2, 4.2.3, Appendix E
157	Jim Smailes		Where does vehicular traffic on Benning Road go? To the neighborhood or to Kenilworth Avenue and 295? Suggestion was made to provide a new entrance onto I-295 for eastbound traffic from west of the river.	Public Hearing Comment Sheet	Traffic Impacts	One quarter to one third of vehicle trips on eastbound Benning Road continue to Kenilworth Avenue and DC-295. Potential new DC-295 entrances are not addressed as part of the proposed action and would require further study and engineering analysis. Any proposed improvements to DC-295 would be addressed via a separate process.	Appendix E
158	Juanita Sizemore		Traffic pattern on Minnesota & Benning Road. Speed is a concern.	Public Hearing Comment Sheet	Traffic Impacts	Traffic impacts are documented in Section 3.2, Transportation and Traffic Operations, and Section 4.2, Transportation and Traffic Operations. Potential changes to the intersection of Benning Road and Minnesota Avenue are addressed on page 4-26.	
159	Juanita Sizemore		I am afraid that if the Rail car comes through our areas it will disrupt our capability of getting to and from the Metro and our Bus service along with the car traffic that comes through the area a disservice to us and those that have to get to work at 5am and 6am in the mornings. Most of us that live in the area do not have cars and we depend on the regularity of the bus and Metro service. Have you seriously thought of the impact the rail car would have if it got stuck due to maintenance breakdown, health issues, snow blizzard, ice, overhead wiring, etc. conditions? We do not have that much commercial business to warrant the rail car in our area. Our buses do a good job	Email	Transit Operations	The streetcar extension would provide additional transit service, capacity and connections within the H Street/ Benning Road corridor. Implementation of the streetcar would not significantly impact intersection Level of Service (LOS) or delay in the study area. The final EA displays existing and future LOS for study area intersections in Chapter 3, Section 3.2.3.1, and in Appendix E, Transportation Technical Memorandum. Chapter 4, Section 4.2.2.2 describes impacts to LOS and delay for critical intersection in the study area. In the case of breakdowns or health issues stopping streetcar service, a	3.2.3.1, 4.2.2.2, Appendix E

Line	Name	Affiliation	Comment	Forum	Topic	DDOT Response	EA Reference
			getting us around.			bus bridge would be implemented. Streetcars can operate in ice and snow conditions as vehicles can be designed or equipped with sanding capability, integral snow plows, and scrapers.	
160	No Name		We need to run more DC Circular Bus around the whole city for every wards of the city.	Public Hearing Comment Sheet	Transit Operations	Circulator route changes are not addressed in this EA. Any changes to Circulator routes would be addressed in a separate planning study outside the scope of this EA.	2.3
161	David Belt		Pepco power lines are underground on one side of the street. On the other side, Pepco has not moved these underground, with little intent of moving their power lines underground any time soon. The streetcar needs to contend with these power lines.	Public Hearing Testimony	Utilities	Given PEPCO power lines, the location of wire for streetcar service and mitigation of conflicts with utilities will be determined during project design.	4.7
162	Norman Comfort		Will the electric power that these streetcars are using be affecting my electric bills in any way?	Public Hearing Testimony	Utilities	No. Electric power cost for streetcar operation is an element of overall operating cost.	
163	Norman Comfort		Will the electric power the streetcar is using affect my electric bill and make them higher?	Public Hearing Comment Sheet	Utilities	No. Electric power cost for streetcar operation is an element of overall operating cost.	