

FINDING OF NO SIGNIFICANT IMPACT
FOR THE
BENNING ROAD & BRIDGES
TRANSPORTATION IMPROVEMENTS
WASHINGTON, DC

The District Department of Transportation (DDOT), in conjunction with the Federal Highway Administration (FHWA), proposes the construction of improvements for Benning Road and Bridges in northeast Washington, DC. In accordance with the National Environmental Policy Act of 1969 (NEPA); the Council on Environmental Quality (CEQ) regulations (40 CFR 1500-1508); Section 106 of the National Historic Preservation Act (54 U.S. Code § 306108), as implemented by the regulations of the Advisory Council on Historic Preservation (ACHP) at 36 CFR 800; 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); Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment Guidance Manual; and DDOT's Environmental Process Manual, an Environmental Assessment was prepared and made available for agency and public review from May 4, 2016 to June 2, 2016. A public hearing was held on May 19, 2016 to present the alternatives and collect public comments. After a thorough review and consideration of all the comments received through the comment period, an Environmental Assessment (EA) was prepared with the selection of the Preferred Alternative identified in this Finding of No Significant Impacts (FONSI).

I. TYPE/PURPOSE OF ACTION

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.

II. DESCRIPTION OF PROPOSED ACTION

The Proposed Action is needed to improve identified specific conditions related to safety, bridge conditions, and mass transit challenges in the study area for the following reasons:

- 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.

It is estimated the Preferred Alternative will cost \$178.1 million to construct and \$4.6 million to operate and maintain annually. Construction would occur over 36 months.

III. PREFERRED ALTERNATIVE

The Preferred Alternative (Build Alternative 2) would provide an 11 to 12-foot wide 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 (for example, overhead wire and support poles, or charging elements) and streetcar stop platforms. In addition, mitigation measures required to be implemented for the construction of the Preferred Alternative are listed in Table 1.

The Benning Road corridor is divided into four typical segments from west to east. All segments would include ADA-compliant sidewalks maintained in the eastbound and westbound directions. The differences in the segments are based on transitions in the lane configuration, listed below.

- ***Oklahoma Avenue to Kingman Island:*** Three traffic lanes in the eastbound and westbound directions, separated by a median.
- ***Kingman Island to 36th Street:*** Four traffic lanes in the eastbound and westbound directions, separated by a median.
- ***36th Street to Minnesota Avenue:*** Three westbound travel lanes and two eastbound travel lanes, separated by a median.
- ***Minnesota Avenue to 45th Street:*** Two traffic lanes in the eastbound and westbound directions.

Bridge Improvements

The Benning Road/Ethel Kennedy Bridge over Kingman Lake would require modification of the deck and girders to accommodate embedded streetcar tracks. The Lorraine H. Whitlock Bridge (Whitlock Bridge) over DC-295 and the CSX railroad tracks is comprised of two separate eastbound and westbound structures. Neither of these structures meets the minimum CSX vertical clearance requirement of 23 feet, nor do they meet current design standards for safe passage of pedestrians and bicyclists. The condition of the existing structures and the changes needed to provide for an extended left-turn lane and widened pedestrian and bicycle paths will require the complete reconstruction of the two structures with a new structure(s) as part of the Preferred Alternative.

Stop Configuration

The Preferred Alternative calls for the construction of five streetcar stops. Moving from west to east, the proposed stops are Kingman Island, 34th Street, 39th Street, 42nd Street, and Benning Road Metrorail Station.

The stops proposed under the Preferred Alternative would provide a single median platform between the eastbound and westbound streetcar tracks. Pedestrians would access one or both ends of the center platform from crosswalks with pedestrian signals. Platform heights would slope to street level at crosswalks.

Traction Power Substations

Electrically powered streetcar operations require Traction Power Substations (TPSS) to supply electricity. A TPSS consists of a fenced area approximately 30 feet by 60 feet within which is a structure that houses electrical equipment. For maintenance access, adjacent parking for two vehicles is required. Under DDOT's Preferred Alternative, two TPSS facilities would be required. 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.

Propulsion System

The source of propulsion power for the streetcars in the study area would be electricity. Overhead Catenary System (OCS) or "wired" is the most common streetcar propulsion technology. OCS is the propulsion method being used on the existing H/Benning Streetcar Line; the wired option would extend the existing OCS into the study area with either the Preferred Alternative. Typically, one or more overhead wires are supported by poles installed at intervals along the streetcar alignment. Under the Preferred Alternative, a set of support poles and overhead wire would be placed in the median of Benning Road.

DC Streetcar Car Barn Training Center

The proposed action does not include an additional storage and maintenance facility since the existing operation and maintenance facility (DC Streetcar Car Barn Training Center) at 2550 Benning Road, will accommodate existing vehicles and new streetcars storage for the proposed action. Maintenance activities for the streetcar component of the proposed action will also be conducted at this facility. However, a new, two-track connection to the DC Streetcar Car Barn Training Center would be required for the proposed action. 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.

IV. SUMMARY OF ENVIRONMENTAL EFFECTS

An analysis of reasonably foreseeable environmental impacts associated with the Preferred Alternative is presented in Chapter 4 of the EA. With the proposed mitigation included in the project, none of the expected impacts were determined to have a significant impact on the natural, human, or built environment as defined by the CEQ regulations. Table 1 below provides a summary of the impacts, as well as the proposed mitigation measures. No impacts are expected to occur on the following resources: Zoning and Land Use, Hazardous Materials, Air Quality, and Energy Use and Climate Change; therefore, these resources are not included in Table 1.

Table 1. Summary of Impacts and Mitigation Measures for the Preferred Alternative

Resources	Impacts	Mitigation Measures
Right of Way Impacts	<ul style="list-style-type: none"> • No residences, businesses, or community facilities would be relocated or displaced. • Temporary construction easements would be required throughout the corridor to accommodate the installation of fencing, erosion and sediment control measures, and similar temporary facilities. • Construction of the streetcar stop and TPSS facility would require approximately 8,547 sq. ft at two Washington Metropolitan Area Transit Authority (WMATA) properties: the Benning Road Metro Station and an open lot adjacent to it. 	<ul style="list-style-type: none"> • DDOT will coordinate with WMATA to attain required ROW agreements and/or real property acquisition at the Benning Road Metrorail Station and adjacent open lot.
Neighborhoods and Community Facilities	<ul style="list-style-type: none"> • Visual impacts would occur from continuous overhead wires for the wired option and street tree removal. • Noise impacts would occur at 13 residences. • Vibration impacts would occur at 20 residences and the Dorothy I. Height/Benning Neighborhood Library. 	<ul style="list-style-type: none"> • DDOT will use context sensitive design measures at the TPSS and stop platforms. • DDOT will consider burying overhead utilities at select locations. • DDOT will use approved design measures to reduce the generation of noise and vibration. • DDOT will replace any street trees removed due to construction.
Transportation and Traffic Operations	<ul style="list-style-type: none"> • Temporary delays to traffic operations would occur during construction. • The LOS at Benning Road-East Capitol Street Intersection would be permanently reduced. • Temporary loss of on-street parking would occur during construction. • Permanent loss of 12 on-street parking spaces on the southbound side of 26th Street would occur. • Reconfiguration of Benning Road Metro Station would occur to accommodate curbside streetcar stop. • Temporary Metrobus operational delays may occur during construction. • Temporary use of CSX right-of way for construction access would be required. 	<ul style="list-style-type: none"> • The DDOT Traffic Management Plan will include adjusted signal timing, the development of alternative routing, and the installation of detours. • Vehicular delays resulting from streetcar operations will be mitigated through changes in signal timing and network optimization. • Once construction is complete, existing site conditions will be restored, thereby resolving any temporary loss of on-street parking. • DDOT will continue to coordinate with WMATA so that there is minimal to no effect on WMATA’s transit schedule due to the construction phasing and operation of the Preferred Alternative. • DDOT will continue to coordinate with CSX to attain a temporary construction easement within their ROW and convey the timing of construction activities.

Resources	Impacts	Mitigation Measures
<p>Parklands</p>	<ul style="list-style-type: none"> • Reconstruction of sidewalks on the eastbound side of the Ethel Kennedy Bridge would require temporary construction access from Kingman and Heritage Islands Park and Anacostia Park. • Visual impacts of continuous overhead wires and street tree removal near Fort Mahan Park would occur. • Increase in noise at Fort Mahan Park due to the proximity of the proposed streetcar stop would occur. 	<ul style="list-style-type: none"> • Temporary impacts to park features and operations will be mitigated through the restoration of disturbed site features in accordance with the permit conditions. • DDOT will replace street trees. • DDOT will use context sensitive design measures at TPSS and stop platforms; and • DDOT will consider burying of overhead utilities at select locations. • DDOT will use approved design measures which reduce the generation of noise and vibration.
<p>Historic Properties and Archeological Resources</p>	<ul style="list-style-type: none"> • Temporary construction related access to areas within the NRHP- listed or eligible Kingman and Heritage Island Park, Anacostia Park, the Baltimore & Potomac Railroad (part of the CSX rail facility under the Whitlock Bridge), and the PEPCO powerplant (located within the Benning Service Center) would be required. • Sidewalk improvements at the intersection of Benning Road and 36th St would result in no adverse effect on the historic Fire & Police Call Boxes. • Noise and vibration impacts in Spingarn High School, Kingman Park Historic District; Browne, Phelps, Spingarn, and Young Educational Campus Historic District; 4208 Benning Road and the block of rowhouses located between 4201 and 4243 Benning Road would occur. 	<ul style="list-style-type: none"> • DDOT will apply for temporary construction related permits from DOEE, National Park Service (NPS), CSX and PEPCO. Temporary impacts will be minimized through the restoration of site features in accordance with the permit conditions. • Avoidance measures will be implemented, as recommended by District of Columbia State Historic Preservation Office (DC SHPO), to avoid any adverse impacts to the Section 106 resources: 1) DDOT will consult with DC SHPO to determine the appropriate sites to relocate the historic Fire & 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). 2) 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. • DDOT will use approved design measures which reduce the generation of noise and vibration; • DDOT will relocate the 42nd Street Stop to west side of the intersection. • DDOT will use context sensitive design measures at the TPSS and stop platforms. • DDOT will consider burying overhead utilities at select locations.

Resources	Impacts	Mitigation Measures
Aesthetics and Visual Quality	<ul style="list-style-type: none"> • Visual impacts would occur from the construction of new streetcar tracks, stops, the overhead electric power system, and the moving streetcar vehicles. • Visual impacts would occur at Fort Mahan Park and eastern Benning Road residential areas associated with the proximity of 42nd Street stop. 	<ul style="list-style-type: none"> • Streetcar stops will be similar in size and appearance to the existing DDOT bus stops. • Streetcar vehicles will be similar in visual appearance to the existing DDOT Circulator bus fleet. • The overhead wires will be constructed to be visually similar to existing utility wires in the corridor. • DDOT will construct streetscape improvements with elements including street paving, curb reconstruction, innovative storm-water management facilities, street lighting, sidewalk improvements, and street tree planting. • DDOT will include context sensitive design measures at the TPSS and stop platforms. • DDOT will consider burying overhead utilities at select locations.
Wildlife including Threatened and Endangered Species	<ul style="list-style-type: none"> • Endangered Species Act, Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration’s (NOAA) resulted in a no effect finding for Northern Long-eared bat (<i>Myotis septentrionalis</i>) and a not likely to adversely affect finding for the federally endangered Atlantic and shortnose sturgeons (<i>Acipenser oxyrinchus oxyrinchus</i> and <i>Acipenser brevirostrum</i>). The DOEE Fish and Wildlife Division determined the project area does not harbor any listed species. 	<ul style="list-style-type: none"> • Mitigation will not be required.
Vegetation	<ul style="list-style-type: none"> • Approximately 147 street trees will be removed. 	<ul style="list-style-type: none"> • DDOT’s Urban Forestry Administration (UFA) will develop and implement a street tree management plan during project design. The plan will comply with District standards and regulations regarding planting, pruning, or removing a tree within the DDOT ROW. • When trees must be removed and as reasonably feasible, DDOT will replace street trees removed within DDOT ROW as part of UFA’s Standard Specification 608.07 Tree Protection and Replacement.

Resources	Impacts	Mitigation Measures
<p>Utilities</p>	<ul style="list-style-type: none"> • Temporary interruptions in services (several hours) could be experienced during relocation or rerouting of utilities during construction. • No permanent impacts to utility service are anticipated. 	<ul style="list-style-type: none"> • DDOT will remain in close coordination with the utility owners throughout the design and construction process. Proactive outreach effort will be made to notify businesses and residences of the schedule for possible utility disruptions. • DDOT will adhere to the planning and design guidelines outlined in Chapter 9 of the DDOT Design and Engineering Manual and DC Streetcar Utilities Standard of Practice 2015 (USP).
<p>Noise and Vibration</p>	<ul style="list-style-type: none"> • Activities associated with construction would result in noise impacts if located in the noise-sensitive areas. • 8 residential noise impacts (4 moderate, 4 severe) at switches for the 26th Street track to the DC Streetcar Car Barn Training Center • 5 residential noise impacts at southeast quadrant of Benning Road – 42nd Street Stop • Vibration Impacts: • 20 residential vibration impacts along Benning Road (FTA Category 2 Land Uses) • 1 vibration impact at Dorothy I. Height/Benning Neighborhood Library (FTA Category 2 Land Uses) 	<ul style="list-style-type: none"> • DDOT will prepare and implement a Noise, Vibration and Air Quality Management Plan as part of the Construction Management Plan to mitigate noise and vibration impacts during construction. • DDOT will relocate the 42nd Street stop to the west side of the street to avoid noise impacts on the residences evaluated during the Draft EA. • DDOT will install “spring frogs,” pointless switches or other controls (such as a “well-designed flange-bearing frog”, or a flange-lifter; • DDOT will increase the radius of the track curves, applying flange lubricators to “grease” the contact points between the steel wheels and the steel rail heads. • DDOT will procure streetcar vehicles that can operate effectively along tracks with radii less than 100 feet without causing wheel squeal to occur. • Reduce the volume of transit bell ringing as safety protocols allow. • Vibration impacts generated by steel wheel - steel rail interactions will be mitigated by implementing vibration control measures, such as ballast mats under the tracks, spring frogs, pointless switches, and flange-bearing frogs.

Resources	Impacts	Mitigation Measures
<p>Environmental Justice</p>	<ul style="list-style-type: none"> The construction and operation of the improvements proposed under the Preferred Alternative would generate a variety of benefits and impacts. Since the proposed action is located entirely in a geographic area with high concentration of minority and low-income populations, both types of effects would affect Environmental Justice populations. Considering the overall economic benefits being generated, along with the District wide mitigation measures being adopted, no net direct or indirect adverse effects are expected to occur on the environmental justice populations. 	<ul style="list-style-type: none"> The Preferred Alternative includes mitigation for Environmental Justice in the following resources: <ul style="list-style-type: none"> Right of Way Neighborhood and Community Facilities Transportation and Traffic Operations Parklands Aesthetics and Visual Quality and Noise and Vibration DDOT has actively solicited public participation throughout the project planning. In addition, District agencies such as Department of Housing and Community Development and Department of Employment Services continue to be engaged in DDOT’s public outreach efforts.
<p>Section 4(f) Evaluation</p>	<ul style="list-style-type: none"> Temporary Occupancy of six Section 4(f) properties would occur to Anacostia Park, Kingman and Heritage Islands Park, Kingman Park Historic District, Fire & Police Call Boxes, the Baltimore & Potomac Railroad (part of the CSX rail facility under the Whitlock Bridge), and the PEPCO powerplant (located within the Benning Service Center). No use or temporary occupancy would occur at Langston Golf Course Historic District as project impacts would only occur within the DDOT ROW. 	<ul style="list-style-type: none"> Mitigation for impacts to Section 4(f) resources will be provided through compliance with the required construction related permits from the NPS and DOEE. Permit conditions will be implemented to guide the construction usage and restore the site features. Mitigation for historic or archeological resources will be implemented by adhering to the DC SHPO conditional concurrence to FHWA’s Section 106 “no adverse effect” finding.
<p>Construction Impacts</p>	<ul style="list-style-type: none"> Impacts would occur from temporary ground disturbing impacts, construction-related congestion & detours, changes in pedestrian movement, presence of construction equipment in viewsheds, increased transmission of sediment & construction debris into surface water bodies, incidental impacts to street trees not planned for removal, possible short-term interruptions of utility service, and generation of construction noise & vibrations. 	<ul style="list-style-type: none"> DDOT will adhere to the conditions of construction access permits to determine site access requirements and restoration activities. DDOT will develop MOT, Traffic and Access, and Construction Management Plan prior to construction. DDOT will strictly adhere to erosion and sediment control requirements. DDOT will prepare a Health and Safety Plan. DDOT will coordinate with utility owners & operators. DDOT will install tree protection measures as necessary. DDOT will prepare and implement a Noise, Vibration and Air Quality Management Plan.

V. COORDINATION AND COMMENTS

Agency Coordination

FHWA and DDOT initiated scoping for the proposed project with District, regional, and federal agencies through a scoping letter issued on February 18, 2014 and conducted a meeting on March 4, 2014. Subsequent meetings with agencies took place as part of DDOT's interagency meetings during the scoping of the proposed action, the development of alternatives, the analyses for the EA, and the Section 106 process. The consulting parties under Section 106 are the FHWA, DDOT, DC SHPO, and the Committee of 100 on the Federal City. After sufficient analysis and consultation with the aforementioned parties, FHWA has determined and DC SHPO has conditionally concurred to a finding of No Adverse Effect.

Based on coordination with the Officials with Jurisdiction (23 CFR 774.17) over Section 4(f) resources within the project area, and in accordance with 23 CFR § 774, FHWA has determined there is no use of a Section 4(f) resource, as land of a Section 4(f) resources will not be permanently incorporated into a transportation facility. Only temporary occupancy (23 CFR § 774.13(d)) will occur. Construction access permits will be attained from the DOEE and the NPS prior to construction. Mitigation for these impacts will be implemented by adhering to the requirements in the permits.

Endangered Species Act, Section 7 consultation was conducted with the U.S. Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration (NOAA). USFWS IPaC desktop consultation resulted in a no effect finding for Northern Long-eared bat (*Myotis septentrionalis*). NOAA consultation resulted in concurrence with DDOT's determination that the proposed activity may affect, but is not likely to adversely affect, the federally endangered Atlantic and Shortnose sturgeons (*Acipenser oxyrinchus oxyrinchus* and *Acipenser brevirostrum*). In addition, the DOEE Fish and Wildlife Division has determined that the project area does not harbor any listed species.

Public Involvement

Public involvement activities conducted for the project included the development of a project website (<https://www.benningproject.com/>), the distribution of a newsletter, and holding public meetings. These meetings included a scoping meeting (April 22, 2014) a project alternatives development meeting (May 28, 2014), a hearing (May 19, 2016) and an open house update (November 15, 2017) to present and attain public comments on the project alternatives. Once the EA was made available for public review, two additional open house meetings were held (September 19, 2019 and February 20, 2020). A summary of major themes of the comments is provided below:

- Concerns for traffic impacts from the build alternatives,
- Concern for impacts during construction including; noise and vibration, traffic and access, and emergency response,
- Concerns for impacts to existing transit operations in the corridor from the build alternatives

- Concern for loss of curbside parking in the study area,
- The need for improvements to pedestrian and bicycle facilities, and
- The need for critical infrastructure and bridge improvements.

A list of comments received on the draft EA during the public comment period and DDOT responses are included in Chapter 6 and Appendix L of the EA. Agency representatives from FHWA, U.S. Environmental Protection Agency Region III, National Capital Planning Commission, Washington Metropolitan Area Transit Authority, DC SHPO, DC Office of Planning, DC Water as well as the general public, ANC Commissioners, and advocacy groups have provided comments on the Draft EA.

VI. REVISIONS TO THE EA

Based on agency and public comments received on the EA, revisions to the text of the document were made in the following sections:

- Aesthetics and Visual Quality,
- Air Quality,
- Construction Impacts,
- Lane Width,
- Neighborhood & Community Facilities,
- Noise and Vibration,
- Parking,
- Pedestrian and Bicycle Accommodations,
- Propulsion Option,
- Public Involvement,
- Section 4(f),
- Street Trees,
- Surface Water Resources,
- TPSS Facilities,
- Transit Operations, and
- Transportation and Traffic Operations.

VII. BASIS FOR FINDINGS OF NO SIGNIFICANT IMPACT

SUMMARY OF FINDINGS

Alternatives Considered but Not Selected

No Build Alternative

The No Build Alternative assumes completion of currently programmed, committed, or funded transportation projects in the study area as identified in the CLRP for the National Capital Region and the TIP for the Washington Metropolitan Region, except for the proposed action.

Existing roadway, bicycle, and pedestrian infrastructure and transit services are assumed to be part of the No Build Alternative condition. For example, transit operations, including Metrobus service, would continue as they currently exist. Scheduled service frequency and routing would remain the same as in the existing condition.

The No Build Alternative would not meet the Purpose and Need for the proposed action because it would not address deficiencies in transportation infrastructure conditions, improve safety conditions and operations for both motorized and non-motorized access, or provide for improved transit operations and options in the Benning Road study area.

Build Alternative 1

Build Alternative 1 would provide an 11 to 12-foot wide, curbside shared streetcar lane for the length of Benning Road in the study area and new pedestrian, bicycle, and safety improvements. Streetcar tracks would be provided in the lane adjacent to the outside curb and pedestrian facilities. Build Alternative 1 would include facilities and structures required for the streetcar operations, such as traction power substations (TPSS), wired or wireless propulsion equipment (for example, overhead wire and support poles, or charging elements) and streetcar stop platforms. Build Alternative 1 would provide streetcar stops at five locations approximately one-quarter mile apart along Benning Road, with separate curbside platforms at each stop location for eastbound or westbound travel at Kingman Island, 34th Street, 39th Street, 42nd Street, and Benning Road Metrorail Station (eastern terminus).

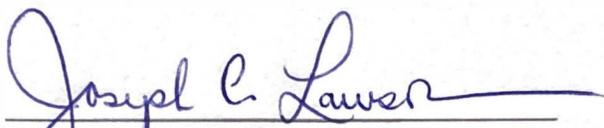
Basis for the Selection of the Preferred Alternative

Build Alternative 1 was not selected to be DDOT's Preferred Alternative because of its greater relative impacts on real property, traffic operations, and community resources due to its location adjacent to the curb. The factor distinguishing the impacts generated by Build Alternative 1 and 2, is the location of the streetcar line and its stop platforms. For example, the curb-side streetcar alignment proposed under Build Alternative 1 would eliminate virtually all on-street parking spaces on Benning Road between Oklahoma Avenue and East Capitol Street. It is reasonable to conclude that the direct impact of this change in parking availability would indirectly impair the operation of businesses and community facilities which rely on this parking. By shifting streetcar operations closer to street-side residences and community facilities, Build Alternative 1 would also generate more noise and vibration-related impacts relative to Build Alternative 2. Lastly, splitting streetcar traffic would require construction of additional curbside streetcar stops and therefore would result in the acquisition of additional right of way (ROW).

Conclusion

The FHWA has determined that the Preferred Alternative for the Benning Road and Bridges Transportation Improvements project will not have a significant impact on the natural, human, or built environment as defined by CEQ. This Finding of No Significant Impact (FONSI) is based on the attached EA and comments submitted during preparation of the EA. The EA has been evaluated by the FHWA and has been determined to adequately discuss the need, environmental issues, and impacts of the proposed project and appropriate mitigation measures. It provides sufficient evidence and analysis for determining that an environmental impact statement is not required. The FHWA takes full responsibility for the accuracy, scope, and content of the attached EA.

Approved:



Joseph C. Lawson
Division Administrator
Federal Highway Administration
DC Division Office

11/27/2020

Date