

Advisory Neighborhood Commission (ANC 4A) Resolution 4A-11-4-20-3, Comments on the Rehabilitation of Broad Branch Road, NW

Revised Draft Environmental Assessment and Section 4(f) Evaluation

November 4, 2020 ANC 4A Meeting

The Advisory Neighborhood Commission 4A takes note of the following:

On October 16, 2020, the Department of Transportation sent Gale Black, as ANC 4A08 commissioner, a notice
subject: The Rehabilitation of Broad Branch Road, NW Revised Draft Environmental Assessment and Section 4(f) Evaluation.

The notice advised that the DC Department of Transportation and the Federal Highway Administration were inviting our review and comments of the document. The comment period will close on November 16, 2020 and only written comments via the project's website can be accepted.

The District Department of Transportation (DDOT), in conjunction with the Federal Highway Administration (FHWA), and in cooperation with the National Park Service (NPS) is proposing the rehabilitation of a 1.5 mile segment of Broad Branch Road, NW, between Linnean Avenue NW and Beach Drive.

Because the city hopes to use federal funding, and because the Federal Highway Administration (FHWA) has oversight of the Federal-aid program, it is participating in the funding of the project.

The ANC 4A08 area is adjacent to the project area. The ANC 4A08 is noted as an interested party. The residents of ANC 4A benefit from the near daily use of this public road.

The existing two-lane, two-way Broad Branch Road lies almost entirely within the DDOT right-of-way. Of historical significance, as noted at page 3-28 of the Proposal, "Peirce Shoemaker deeded the roadway to the federal government in 1854, after which it became an official public highway." One of the earliest surveys showing the alignment of road was shown in a September 1864 survey plat for the Levy Court. Page 3 - 28.

Because Advisory Neighborhood Commission 4A08 was notified that DDOT has issued a Revised Draft Environmental Assessment, I (Gale Black) asked that this matter be placed on the agenda for our November 4, 2020 meeting. The ANC 4A, and the public, have until November 16, 2020 to submit comments. I recommend that the ANC 4A support either Alternative 2 or the preferred Alternative 3 (modified).

The purpose of the proposed action is to rehabilitate Broad Branch Road. The need for improvements relates primarily to the deficiencies in the existing roadway infrastructure and storm-water management system, as well as to enhance public safety. This public vehicular right-of-way has deteriorating pavement, inadequate storm water drainage and an aging inadequate roadway structure. See Section 1.2.1 Infrastructure Deficiencies. The problem is exacerbated by the storm water drainage issues.

Plus, the US Environmental Protection Agency (EPA) lists Broad Branch as impaired due to high levels of fecal coliform. The Rock Creek Watershed Implementation Plan lists both Soapstone Creek and Broad Branch as exceeding the Total Maximum Daily Load (TMDL) for organics and fecal coliform.

The quickest, most cost effective option is the Candidate Build Alternative 2, which is the minimum width alternative that generally meets the purpose and need of the project (which is to fix the road and stop the erosion). That alternative allows the restoration within the existing right-of-way. It would not require the acquisition of additional right of way from the National Park Service or any private or international property. However, it does not provide for the addition of sidewalks. The cost for Alternative 2 is \$37.4 million with an approximate construction time duration of 24 months.

The city's recommended option is Alternative 3 (modified). The total cost for Alternative 3 is \$44.7 million and construction would take 30 months. This proposal would consist of two 10-foot travel lanes and a 6 foot wide sidewalk on the west side of the roadway. This one may require the city to purchase more land. Some sections of the roadway would also require retaining walls to minimize the right-of-way requirements and to stabilize the slopes; and it would require studying the designs in close coordination with the Park Service. It looks like the city prefers this modified version of Alternative 3.

Alternative Build 4 had been supported by the Forest Hills ANC, but those commissioners are no longer on that commission. This alternative is the widest of the project alternatives and consists of two ten foot travel lanes, a six-foot sidewalk on the west side, and a four-foot bike lane on the east side and standard curbs and gutters. The total estimated cost for Alternative 4 is \$57.5 million and the approximate construction duration is 36 months. In addition to the cost and time, this alternative would require 16 retaining walls on the west side of the roadway that would range from three to sixteen feet high and be 4,700 feet in length. It would negatively change the view and visual experience and enjoyment in the Park. The City conceded that Alternative 4 "may also require additional right-of-way, along the east side of the roadway on NPS land." Plus any grading outside the existing DDOT right-of-way would require a temporary construction easement. It may also require the removal of more than 400 trees.

The city has not shown that the proposed changes in function are necessary or in the public's interest. We disagree that there is no adverse impact, because there is the destruction of many trees, and the addition of paving to soils that are already eroding. Due to the unnecessary

delays caused by these studies, the city and the Federal Government have not taken the steps needed to protect the environment or preserve this historic road.

Right now, the purpose of Broad Branch Road is a road. "It does not currently have sidewalk facilities." The function would need to be changed to add "pedestrian facilities." A pedestrian path would also have to meet the requirements for the Americans with Disabilities Act. In addition, a portion of the existing Broad Branch Road lies within the "10-year floodplain for Broad Branch stream, resulting in significant erosion damage to the roadway. New pavement would increase the area of impervious surfaces and could result in more erosion. Expansion of the roadway and the disturbance of areas adjacent to the roadway during construction would remove vegetation, including some large trees.

I move that ANC 4A support Alternative 2, because it would address the most urgent need to restore the road and address the environmental concerns as quickly as possible, for less money, and without unnecessary paving that could further harm the environment. The other options would cost more and are likely to prove impractical, because DC does not currently own, or control, the land that would be needed to widen the roadway to put in a bike lane or add sidewalks.

THEREFORE, BE IT RESOLVED, that ANC 4A recommend that the city adopt Alternative 2, or if feasible, "Alternative 3 modified" (which would permit the addition of a sidewalk) and fix the infrastructure deficiencies in the next most cost-efficient manner. It is further resolved that the current Chair of ANC 4A, and author of this resolution, submit the resolution as the ANC 4A's comments electronically at the project's website.

ADOPTED BY _____ vote at a regular public ANC 4A meeting, for which notice was properly given and at which a quorum of _____ of seven Commissioners were present, by a vote of _____ yes, _____ no and _____ abstentions.