

11.0 Coastal Zone Management Act (CZMA) Consistency Certification

11.1 Introduction

The Columbia Pike Transit Initiative is one element of a decade-long effort by Arlington and Fairfax Counties to accommodate growing demand for transit service along this quickly redeveloping urban corridor. The project proposes to address transportation needs along the corridor and is also seen as an investment that would foster the counties vision for Columbia Pike as a multimodal corridor, linking its walkable, mixed-use, mixed-income neighborhoods, to the Washington, DC area transit network and thus, the region's major activity nodes. The activities included in the proposed project will occur within Fairfax County and Arlington County defined as a Tidewater Virginia community, and will be funded in part by the Federal Transit Administration (FTA). As such, an evaluation, which demonstrates consistency with the nine enforceable policies of the Virginia Coastal Zone Management Program (VCP), is required.

This document provides the Commonwealth of Virginia with the Washington Metropolitan Area Transit Authority (WMATA) and Arlington County Virginia Consistency Certification and necessary information required under the Coastal Zone Management Act (CZMA) Section 307(c)(A) and 15 CFR §§ 930(D), for the proposed Columbia Pike Transit Initiative project. The information in this Consistency Certification is provided pursuant to 15 CFR §§ 930.

11.1.1 Project Description

Transit Alignment

The study corridor is located on the Alexandria, VA-DC-MD, 1994 USGS topographic map approximately between 38° 50' 63" N and 77° 07' 12" W, and 38° 51' 78" N and 77° 3' 25" W.

The proposed transit alignment, station stop locations, and additional facilities included as part of the Columbia Pike Transit Initiative are shown in **Volume I, Figure 2.2-4**. The study corridor extends along an approximately five mile corridor focused on Columbia Pike, with deviations at both ends to reach the key destinations of Skyline in Fairfax and Pentagon/Pentagon City in Arlington. The proposed transit improvements will primarily utilize existing roadway right-of-way. However, engineering analysis has identified that the Streetcar Build Alternative would also require superstructure and substructure improvements to the Columbia Pike Bridge over Four Mile Run.

The proposed Columbia Pike Transit Initiative project complies with the enforceable and advisory policies of the VCP and will be conducted in a manner consistent with such policies.

Facilities

The Streetcar Build Alternative will utilize existing transit stops along Columbia Pike. Bus and streetcar stops would be consolidated and would be located approximately ¼ to ½ mile apart. Considerable improvements would be made to existing transit stops at either end of the corridor (in Pentagon City and near Jefferson Street and Skyline). The typical features of the proposed station stops include platform design similar to existing Super Stops along Columbia Pike, a 100 to 120 foot boarding area with a low platform, a length of 90 -120 feet, a width of 8 - 12 feet, improved shelters and amenities, off-board fare collection, multi-door boarding, and improved passenger information utilizing ITS.

This alternative would also include the construction of a new Operation and Maintenance Facility in Pentagon City at 12th and Eads Street, a construction staging and equipment storage site in the vicinity of the existing Navy Annex, an intermodal transit center on Jefferson Street (Jefferson Street Transit Center), and 4 traction power substations (TPSS) located approximately 1 mile apart along the corridor. Park and Ride facilities include the existing 28-car park and ride facility near Four Mile Run as well as the new Jefferson Street Transit Center.

11.1.2 Enforceable Policies of the Virginia Coastal Zone Management Program (VCP)

The VCP contains the following applicable enforceable policies:

- **Fisheries Management:** The proposed project would not likely adversely affect federally-listed threatened or endangered species of concern. The project team contacted the Virginia Department of Game and Inland Fisheries (DGIF) as part of the Environmental Evaluation. Correspondence with the DGIF is provided in Volume II, Chapter 16. Further, the project will not use tributyltin in any form, and will implement best management practices (BMPs) in accordance with state and local guidance documents, during all phases of construction.
- **Subaqueous Lands Management:** As stated above, the Streetcar Build Alternative would also require superstructure and substructure improvements to the Columbia Pike Bridge over Four Mile Run. The addition of concrete in-fill walls between the existing bridge piers and the expansion of the footings on the existing bridge piers may potentially impact Four Mile Run stream and require a Virginia Marine Resources Commission permit. Correspondence with the Virginia Department of Environmental Quality (DEQ) is provided in Volume II, Chapter 17.
- **Wetlands Management:** No activity associated with the proposed project will occur within wetlands. Therefore, this VCP enforceable policy is not applicable to the proposed project.
- **Dunes Management:** The proposed project is not being constructed either within or near an area of beach or coastal primary sand dune.

Therefore, this VCP enforceable policy is not applicable to the proposed project.

- **Non-point Source Pollution Control:** The project is primarily located in an urban area covered with concrete and asphalt. However, improvements to existing local station stops at either end of the corridor and construction of the operations and maintenance facility, construction staging and equipment storage facility, and TPSS would increase the amount of impervious surface and result in some increased runoff. Therefore, potential water quality impacts may occur.

Stormwater management facilities will be located as required and all appropriate permits and approvals will be acquired. A stormwater management plan, as required by the Virginia Department of Conservation and Recreation, for erosion and sediment control will be prepared for the site for use during construction activities, and the technical criteria stipulated in the Virginia stormwater management regulations will be incorporated into the project's BMP design. A stormwater pollution prevention plan for the overall project will be developed, detailing the plan to manage other wastes on site, such as building materials, garbage and debris, and to implement controls to minimize the exposure of these materials to stormwater. The project will be designed to ensure that stormwater impacts during construction are avoided or minimized to the maximum extent practicable. Construction methods will be selected to minimize the potential for non-point source pollution impacts (primarily erosion and sedimentation) to occur during construction of the proposed project. The project will comply with the Virginia Pollutant Discharge Elimination System (VPDES) Stormwater General Permit for associated construction activities.

- **Point Source Pollution Control:** As proposed, most transit improvements will occur within existing right-of-way. Design plans are anticipated to employ the existing urban curb and gutter methods to direct stormwater runoff to the existing storm drain system. Efforts will be made to incorporate low-impact development concepts into the proposed design of consolidated or improved station stops and additional facilities. The long-term management of stormwater runoff from these structures will be designed in coordination with regulatory officials in Fairfax County and Arlington County. There will be no sanitary discharges associated with this project.
- **Shoreline Sanitation:** The proposed project will not include any "...sanitary collection, conveyance, transportation, treatment," or the "...disposal of sewage by onsite sewage systems and alternative discharging sewage systems..." (Code of Virginia § 32.1-164). Therefore, the above VCP enforceable policy is not applicable to the proposed project.
- **Air Pollution Control:** The proposed project site is located within the National Capital Interstate Air Quality Control Region (AQCR 47). The

region is designated as a non-attainment for ground-level ozone. The project team has completed a traffic analysis and hot-spot air quality analysis. No exceedances of NAAQS standards is expected to occur as a result of the project. The project design will be completed in accordance with all local, state, and federal air quality regulations.

- **Coastal Lands Management:** The Virginia Coastal Resource Management Map identifies the entirety of Fairfax County and Arlington County as within the Coastal Zone Management Area. The entire project area is also considered a part of Tidewater Virginia, as defined by the Code of Virginia § 28.2-100, and borders the Potomac River, which eventually discharges into Chesapeake Bay.

In accordance with the local Chesapeake Bay Preservation Ordinances, Arlington County and Fairfax County have designated Resource Protection Areas (RPAs), which include all tidal wetlands, tidal shores, and all non-tidal wetlands that are connected by surface flow and contiguous to tidal wetlands, or water bodies with perennial flow, and a 100-foot buffer zone extending from each of these areas. These RPAs are intended to protect the riparian buffers along streams. The RPAs in the study corridor are associated with the Doctors Run, Four Mile Run, and the Long Branch stream systems (See Attachment C).

In addition to RPAs, Arlington County and Fairfax County have also designated Resource Management Areas (RMAs) in accordance with the Chesapeake Bay Preservation Plan. RMAs, as defined in the local ordinances, include land that, if improperly used or developed, has a potential for causing significant water quality degradation or for diminishing the functional value of an RPA. Development and redevelopment in RMAs are required to engage in land management techniques to minimize adverse impacts on water quality. All areas located outside of RPAs within Arlington County and Fairfax County are designated RMAs; therefore, the entire study corridor (outside of RPAs) is located within an RMA.

Federal Lands, the use of which is by law subject solely to the discretion of or which is held in trust by the federal government, its officers or agents, are excluded from Virginia's coastal management area. However, activities on federal lands with any reasonably foreseeable coastal effects must be consistent with the VCP. Federal agencies should also consider the advisory policies of the VCP.

As stated above, the Streetcar Build Alternative would also require superstructure and substructure improvements to the Columbia Pike Bridge over Four Mile Run. The addition of concrete in-fill walls between the existing bridge piers and the expansion of the footings on the existing bridge piers may potentially impact Four Mile Run stream and the associated RPA. In order to construct the in-fill walls and expand the footings of the existing piers, a cofferdam would be built and used to dewater the construction area. Construction time to complete substructure improvements would be approximately four to six months. Correspondence with the Virginia

Department of Environmental Quality (DEQ) is provided in Volume II, Chapter 16.

Furthermore, a TPSS located at the intersection of Washington Boulevard and Columbia Pike is located in a Resource Protection Area and may potentially impact this coastal resource.

Project-wide plans for erosion and sediment control and stormwater management will be developed and implemented. These plans will comply with state and local regulations and will be approved before construction is initiated. A water quality impact assessment shall also be completed for any proposed development within an RPA. Therefore, the proposed project will not affect land or water uses, or natural resources in the Virginia Coastal Zone.

11.1.3 Advisory Policies

Although not required for the purpose of consistency, in accordance with 15 CFR §§ 930.39(c) and 930.58(a) (3) applicants should demonstrate adequate consideration of policies, which are in the nature of recommendations. These include policies related to Coastal Natural Resource Areas, Coastal Natural Hazard Areas, Waterfront Development Areas, and Shorefront Access Planning and Protection. The Columbia Pike Transit Initiative project and associated activities will not affect any of the areas of special consideration in any planning resources management process.

Based on this information, data, and analysis, the Columbia Pike Transit Initiative project team finds that the project is consistent to the maximum extent practicable with enforceable policies of the Virginia Coastal Zone Management Program.

By this certification that the Columbia Pike Transit Initiative project is consistent with the Virginia Coastal Zone Management Program, Virginia is notified that it has six months from the receipt of this letter and accompanying information in which to concur with or object to the project team's certification. Pursuant to 15 CFR 930.63 (b), if Virginia has not issued a decision within three months following commencement of State agency review, it shall notify the project team and the Federal Transit Administration of the status of the matter and the basis for further delay. That State's concurrence, objection, or notification of review status shall be sent to:

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