

Good Afternoon Ladies and Gentlemen,

My Name is Kimberly Collins and I reside in Fredericksburg Virginia, in Spotsylvania County.

I am a slug and I support HOT proposal with the extension of the lanes to Spotsylvania, Exit 126.

I commute daily to my office in Rosslyn. I enjoy the advantage of the slugging opportunities along I-95, but have several concerns.

I have read and heard about the possibility of extending the current lanes to Exit 126 in Spotsylvania and I support this initiative 100%. I understand the opposition to the extension and the conversion from other sluggers in the Prince William area, but I don't think they are looking at the full picture. Their concern is that they will eventually have to pay and that the lanes will become more congested. I personally don't think that the lanes can become any more congested than they are.

From my understanding, the HOT lanes will do several things. The first and one of the most important to me is that they get all the HYBRID VEHICLES out of the lanes that are single riders. That is where the majority of the congestion comes from. On a daily basis, I see more Hybrid single riders in the HOV lanes that I do actual slugs.

The second is that the Prince William County commuters are constantly complaining about the number of parking spaces available for them to park. With the conversion to HOT lanes, there will be more commuter lots built further south and the commuters that live south of where the lots are currently located will not have to drive more than to their nearest exit to pick up slugs. I personally drive 20 miles one way to get to a commuter lot so that I can pick up slugs or slug myself. I know of some people that drive from Richmond to Route 610 to slug; and some people that drive from Route 610 to Horner Road or Potomac Mills to slug, because they are afraid of the unreliability of the slug lines.

The third is the hours that the HOV lanes are currently in effect are a short window in the morning and the HOT proposal is to have the lanes enforced 24/7, so there is more of an opportunity, if I have to work late or come in

later, to slug. The current lanes go in one direction or another and are not changed according to the flow of the traffic. With the HOT proposal, it is my understanding that the lanes can be changed to accommodate the flow of traffic and help ease some of the congestion. This would be especially helpful on the weekends when on Saturday morning everyone is still trying to get to the beach, the current HOV lanes are going north and the traffic is going south at about 10 miles per hour! And it is reverse on Sunday night when everyone is trying to come home.

The fourth I would like to make is that the bus transportation from the commuter lots only run when the HOV is enforced. With the extension of the HOV hours and the extension of the lanes, I would hope that there would be an opportunity to run express busses from the primary commuter lots, like Spotsylvania to the Pentagon, Fredericksburg to Pentagon and so forth. It would definitely cut down on time to commute and also decrease the number of cars on the road if people had more opportunities for public transportation.

The fifth and final point I would like to make is that I, like so many other people, personally can not afford to live in Prince William or Fairfax county and have no choice but to live where affordable housing is located. Unless you have lived here in Northern Virginia for the past 5-7 years, you are going to pay more than \$300,000 for a house and have your neighbor only a cup of sugar away. The current road infrastructure is not keeping up and does not adequately support the number of people that live in Northern Virginia and commute to work in the city. With the extension of the HOT lanes it allows those who can not afford to live in PW or Fairfax county the opportunity to get to the city where the jobs are and still be able to have a quality of life that we all deserve and not have to go to work to pay your mortgage or rent and not be able to do anything else in life. The extension also adds to that quality of life, in that the time spent on the road is decreased, the stress level is decreased, thereby decreasing the chance that you would have an accident or be party in a road rage incident.

My Name is Kimberly Collins and I reside in Fredericksburg Virginia, in Spotsylvania County.

I am a slug and I support HOT proposal with the extension of the lanes to Spotsylvania, Exit 126.

**STATEMENT OF MICHAEL J. LEVITIN
TO THE
TRANSPORTATION PLANNING BOARD,
METROPOLITAN WASHINGTON COUNCIL OF GOVERNMENTS**

April 18, 2007

Chairman Hudgins, and members of the Transportation Planning Board:

My name is Michael Levitin. My wife and I live in North Arlington. I am appearing as a private citizen to urge you to reject the proposed widening of Interstate 66 and the so-called "spot improvements."

My wife and I oppose the widening of I-66, even though our jobs frequently require us to travel by car on I-66, and even though the supporters of these proposals assert that our travel time would be reduced if the capacity of I-66 were increased.

We oppose the widening of I-66 for four main reasons:

- First and most significantly, widening I-66 will significantly and adversely affect our environment. We will lose trees, wetlands, and natural parkland. Air pollution, water pollution, and noise pollution will increase. The Custis Trail, where my wife and I run, will be materially and adversely affected. Widening I-66 will deprive Arlington of increasingly scarce green space.
- Second, widening I-66 will not solve Northern Virginia's transportation problems. Numerous studies of road-building projects throughout the United States establish that widening a road has only a temporary effect on congestion. Wider roads briefly alleviate congestion, but wider roads attract more cars. Congestion ultimately returns to its original level.
- Third, there are many better ways to address congestion along the I-66 corridor. Other speakers have addressed or will address these in more detail than I can in my brief time.
- Fourth, there was a deal, when I-66 was built, to restrict I-66 to 4 lanes. The Coleman decision states, "I [Secretary of Transportation William Coleman] approve the request for federal aid for I-66 subject to agreement by the Commonwealth of Virginia that it will . . . not construct any highway lanes in the I-66 right of way beyond the four which I am now approving."

The first and the last of these points are linked. My wife and I run and walk along the Custis Trail. We have examined VDOT's proposal, particularly "Spot 3," the segment that affects the portion of the Custis Trail with which we are most familiar. We are very dubious about the position taken by the supporters of this proposal – that the "spot improvements" will not affect the Custis Trail. If VDOT cannot keep its agreement on the most important aspect of the Coleman decision – if it cannot keep its agreement restricting I-66 to four lanes – how can

anyone trust VDOT to maintain the Custis Trail, or indeed, to keep any other agreement relating to I-66?

From our perspective, widening I-66 significantly harms our environment. Widening I-66 breaks a promise that was made to the citizens of Arlington. And widening I-66 will not solve the congestion problem. Please do not approve the widening of I-66 or the "spot improvements."

Thank you.

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April 18, 2007

Statement of Audrey Clement To TPB On Behalf of Green Party of Virginia.

Hello, TPB members and staff. My name is Audrey Clement, and I am here on behalf of the Green Party of Virginia to express my opposition to VDOT's request for inclusion of I-66 Spot Improvements in the CLRP. My principal objection is that VDOT has not demonstrated that the proposed on-ramp extensions comprising 4 miles of the 6.5 mile I-66 corridor from Rosslyn to the Beltway would actually improve traffic conditions on I-66.

In support of spot improvements, VDOT released a report dated September, 2006 entitled "I-66 Inside the Beltway: Vissim Modeling Documentation", which presents its recommendations based on a traffic modeling analysis. The essence of the report is a table that scores each proposed alternative on several types of operational performance compared with the 2010 No-Build option. Evaluating each option in turn, it concludes that three of the alternatives represent significant improvements over the status quo.

The proposed improvement that I question the most is the 1.5 mile extension from Fairfax Drive to Sycamore Street. There is no doubt that this stretch of road is often congested. During non-HOV portions of AM and PM peak periods, the Fairfax Drive on-ramp is routinely backed up. According to VDOT, extension of the acceleration lane will alleviate the backup there, reducing average travel time during the most congested period by 7 minutes.

I submit that this scenario is counter-intuitive. Only if the bulk of traffic gets on at Ballston and off at East Falls Church can an extended acceleration lane alleviate traffic between those points. Otherwise a new bottleneck will be created near Sycamore Street by cars merging from the acceleration lane onto mainline I-66.

If most of the traffic on westbound I-66 at Fairfax Drive consists of short trips between neighborhoods and the acceleration lane does not induce more traffic between them, then recommended Spot Improvement 1B might make sense. But a similar reduction in congestion could be achieved by extending HOV restrictions, which would then divert neighborhood traffic to parallel roads, where it arguably belongs. The advantage of enhanced HOV over Spot Improvement 1B? \$31.6 million, according to VDOT's own estimate of the cost of constructing the acceleration lane.

Since I'm not a transportation planner, I could be wrong about this. The problem is VDOT has not published the statistical outputs that the VISSIM model produced. Thus it is impossible to adduce whether the analysis is right or wrong. VDOT touts the fact that it routinely holds workshops to solicit public opinion. But what point is there in vetting the public, when people have no basis upon which to make informed decisions?

Arlington County Board Chairman Paul Ferguson expressed a similar sentiment in a March 28 letter to VDOT District Administrator Dennis Morrison, demanding information documenting the need for spot improvements, including "the assumptions used and results of the traffic simulation models."

If Arlington County Board needs this information, I cannot imagine that TPB staff would not also require it in determining whether to include the I-66 Spot Improvement project in its CLRP. I urge TPB to make no decision on this matter until TPB staff have had a chance to review the statistical outputs of the VISSIM model and/or conduct their own analysis of the project.



**Public Comments On The I-95/395 HOT Lane Project
and the I-66 Spot Improvement in the 2007 CLRP
The Metropolitan Washington Council of Governments Transportation Planning Board**

**Submitted By
Mahlon G. (Lon) Anderson
AAA Mid-Atlantic Office of Public and Government Affairs
701 Fifteenth Street, N.W.
Washington, D.C. 20005
April 18, 2007**

Good afternoon Chair Hudgins and Members of the National Capital Region Transportation Planning Board.

No doubt, we are all familiar with the phrase "The lesser of two evils." It holds that when there's a choice between two bad political outcomes, one must choose the lesser of the two.

Even motorists in our area find themselves having to make hard choices. One such choice that looms is even greater gridlock on interstates 95 and 395 in the future or having to pay exorbitant tolls if the project is approved to convert two existing carpool lanes on these roads into three high-occupancy toll (HOT) lanes.

As the representative organization for over 800,000 motorists in the Washington metro area this is where AAA Mid-Atlantic finds itself. We would prefer to choose the better of two goods.

In terms of preferences, at AAA Mid-Atlantic we have long supported the much-needed expansion of highways in our region to address our near-worst-in-the-nation congestion. For example, the auto club supports testing spot improvements on westbound I-66 inside the Beltway.

We also believe expanding I-95/395 in Northern Virginia is urgently needed to address the region's seemingly intractable congestion woes. That too is our preference.

Although we support the project in principle, in all candor, we have some serious reservations regarding the I-95/395 high-occupancy toll (HOT) lanes project.

At this juncture, the auto club believes that many critical questions remain on the table despite the efforts of Flour/Transurban, and in many cases, VDOT, to address them.

In our view many critical questions remain unanswered that would make it understandable, if not prudent, for the TPB to delay or deny approval at this time.

Some the critical issues that are still unclear are:

- **Safety.** The project would take some of the existing shoulders and turn them into express lanes along I-395, and reduce the width of the remaining shoulders. Reducing or eliminating shoulders on major highways makes them much less safe. Moreover, turning this public asset over to a private entity needs some scrutiny.
- **Policing.** The contractor has indicated that state police will patrol the lanes, but their last discussion with State Police was over a year ago, and Virginia State Police, who are currently short some 35 troopers in Northern Virginia, say this could be problematic.
- **Tolls on the express lanes.** With no caps in the agreement on what tolls the contractor can charge, estimates in a recent front page Washington Post story ran as high as \$41 for a round trip in prime time for motorists who use the express lanes for their entire 21 mile length. We need to consider carefully a project that could result in Rolls Royce roads – possibly turning our public highways into a two-tier system where only the rich will roll while the rest of us sit gridlocked
- **Road Expansion Restrictions.** Are there agreements that would preclude local parallel roads or I-395 itself from being expanded further? Such PPP agreements can include such restrictions – and often do. Those kinds of restrictions were the downfall of the highly-touted but ill-fated similar project in Orange County, California that had to be bailed out by local taxpayers.
- **HOV 3 or 4?** Since HOV vehicles ride free, the contractor will certainly want to limit the free rides and will likely seek to move the HOV standard to four passengers, something that will not be very popular with many regular carpoolers.

Before giving the green light to this project, let's make sure it's done responsibly and in a way that won't cost more motorist lives, that police can live with, and that will be fair to all, regardless of income.

Only when all of these issues are fully addressed can we know with certainty if this is the deal we should be making— or whether we should make or have a better deal.

After weighing the options before motorists, AAA Mid-Atlantic urges the Transportation Planning Board to choose the greater good and to approve the westbound I-66 inside the Beltway spot improvements.

However, sometimes in having a choice of the lesser of two evils we are left with no choice at all.

Pragmatism aside, we don't think the TPB should make a rush to judgment in the I-95/I-395 HOV/Bus/HOT Lanes project for air quality conformity testing for the 2007 Constrained Long Range Plan and 2008-2013 Transportation Improvement Program.

In our view, details have been hard to come by, and therein lies the biggest problem. By our reckoning, there are more questions than answers at this juncture. Perhaps the wiser course of action is to wait until all the information is on the table and to allow adequate time for public review.

Sometimes public officials, including those who serve on the Transportation Planning Board, are faced with a Hobson's choice in matters large and small. At the end of the day they realize an apparently free choice is no real choice at all. We must also ask ourselves are we leaving the motoring public with a choice without an alternative?

It is our hope that the Transportation Planning Board will weigh our comments and that of the motoring public during this process.

Not all HOV lane conversions to HOT lanes are successful. When SR 91 in California failed financially, HOVs paid the price.

When SR 91 converted its HOV lanes into HOT lanes, too many HOVs utilized the lanes and kept toll revenue low. To fix this, **the toll facility started charging HOVs a 1/2 price toll.** Carpooling participation declined significantly.

How many HOVs were too many? About 16% of the traffic on the HOT lanes were HOV3+. When HOV3+ traffic dropped to 12% because of the new toll, revenue increased. Presently, HOVs constitute 80% of the Arlington section of the I-395 HOV lanes. **How many HOVs are too many for Fluor/Transurban's plans?** Will laws be changed to accommodate toll revenue and charge HOV commuters? Does encouraging solo driving habits really solve the congestion problem?

You might want to ask the Commonwealth Transportation Board commissioners the following questions:

- 1) If Fluor/Transurban's detailed plan expects only 10-12% HOVs on the HOT lanes, and VDOT's 2006 traffic study of the HOV lanes shows that HOVs are 80% of morning traffic in Arlington, will Fluor/Transurban be able to generate enough revenue to remain financially solvent?
- 2) If Fluor/Transurban will need to make changes to recoup losses due to high HOV traffic on HOT lanes, will they follow California's SR 91 toll road example? SR91 started charging HOVs a 1/2 price toll. That made the quantity of morning HOVs decline significantly and increased solo drivers on all the lanes.
- 3) How will a greater quantity of single occupancy vehicles fix our pollution crisis?
- 4) Has a study been conducted to determine how many non-bus-riders will switch to buses once the HOT lanes are created? Will there be a significant increase in people who choose to ride a bus?

For more information or to see any of the documents listed, go to:

My HOV website at <http://mason.gmu.edu/~tsharpe2/hov>

(I apologize that it is still in a draft format and is being revised daily.)

or

For the Fluor/Transurban detailed report, go to:

www.faster95.com -- choose #7, download "detailed proposal." Go to pdf page 256, look at year 2015 and later. (I would advise you to check this out today, as this website will likely be revised when this news gets out.)

The SR 91 study can be located at: http://ceenve.calpoly.edu/sullivan/SR91/final_rpt/FinalRep2000.pdf

Turn to page 31 of the study (or page 58 of the pdf file) to see the chart showing the drop in HOV-3 ridership after ½ price tolls were instituted. Another example is on page 51 of the study, or pdf page 78.

If you would like a copy of the fall 2006 VDOT study of HOV lane usage, contact Valerie Pardo at valerie.pardo@vdot.virginia.gov or ask me, as I have a copy.

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The Opposition of the Washington Area Bicyclist Association to the Widening of I-66

Creating better bicycling conditions and a wider range of transportation choices is a key objective of the Washington Area Bicyclist Association (WABA). WABA's advocacy encompasses a broad range of efforts to make communities more bicycle-accessible and to improve bicycle connectivity throughout the Washington, DC region. Multi-use trails and multi-modal corridors such as the W & OD Trail and the Custis Trail form vital networks connecting cyclists with employment, recreational, and other opportunities in disparate parts of the metro area. Conversely, transportation projects that are overly focused on a single mode or that do not adequately take into account community impacts can significantly discourage bicycle use and diminish transportation choices.

Proposals to widen I-66 inside the Beltway directly affect an important bicycle corridor. The addition of a third westbound lane could require permanent relocation of significant sections of the Custis Trail and jeopardize the useability of this route connecting Northern Virginia and Washington, DC. Construction activity would also force the closure of trail overpasses on I-66. These developments would be highly detrimental to many bicycle commuters and other cyclists who use this route.

Any expansion of I-66 inside the Beltway would also have less direct but equally grave impacts on bicycling conditions in Northern Virginia. Adding road capacity in one part of the region will create more demand for added capacity on arterial roads such as Routes 50 and 123. These roads are potentially valuable routes for bicycle transportation but currently lack bicycle accommodations near the most densely populated residential areas and employment centers. WABA supports multi-modal facilities on these roads that include bicycle lanes, paths, or other accommodations for cyclists.

Expanding I-66 would put more pressure on these roads to continue to serve a single mode at the expense of bicycle, pedestrian, and transit uses that represent the real key to addressing congestion problems. Given that the expansion would violate the agreement that was originally made with surrounding communities and which was the condition for building I-66, any widening would set a particularly unfortunate precedent and facilitate other expansion projects to the detriment of bicyclists.

For the reasons expressed above, **WABA opposes the expansion of I-66.** The expansion will directly harm the Custis Trail, and will induce more automobile travel and deter use of alternatives such as bicycling, worsening the region's traffic congestion. A better, and less expensive alternative would be to create a network of bikeways connecting existing trails with major transportation corridors such as Route 50.



**“Testing the TPB’s Will to Test”
Statement of Robert O. Chase
To the National Capital Region Transportation Planning Board
April 17, 2007**

The Northern Virginia Transportation Alliance urges the Transportation Planning Board to approve the I-95/395 HOT Lane and I-66 westbound spot improvements for air quality conformity testing.

Two weeks ago, I set out from Tysons Corner to Richmond, leaving before 3:00 p.m. hoping to get in front of at least some rush hour traffic. Three hours later, I approached Quantico. I reached Richmond at 8:00 p.m. Route 1 traffic was also at a standstill. Reports indicated no accidents, just volume.

I don’t know how many of the thousands of people traveling at less than 5 miles per hour would have gladly paid \$20 to save two hours, but I can assure you there was at least one.

In the next forty years our nation’s population will increase by more than 100 million. Many of these folks will travel the I-95 corridor.

Federal and state governments have no plans or resources to upgrade this corridor. I’m not aware of any by Prince William or Stafford, and the TPB refuses to even test eastern and western bypass alternatives that would take significant long distance trips off the I-95 corridor in its six-years-and-counting regional mobility and accessibility exercise.

By default, that leaves relief to the private sector. Questions remain to be answered in the coming months. One is air quality conformity, which the TPB should authorize today. On I-66 the issue is spot improvements. If spot improvements must be tested for air quality conformity, can curb cuts be far behind?

I-66 inside the Beltway is one of the nation’s most multi-modal corridors.

Having run on its bike path for over twenty years, I can confirm it works quite well. It even has lighting for late night and early morning use.

The rail component also operates well, although mid-day trains have many empty seats. At the same time, adjacent lanes are clogged with traffic due to decades-old political constraints that ignored the well documented need for four lanes in each direction that is even more obvious today.

More multi-modal studies are *not* needed to know more lane capacity will produce multi-modal benefits for autos and buses. It’s just a matter of being sensible and smart.

But air quality conformity study *is* required, and the Alliance asks you to authorize it today.

Again, we have the nation’s third worst congestion, our nation in projected to add 100 million people, and some would tell you not even to *test* I-66 spot improvements and I-95 HOT lanes for air quality conformity?

Let’s be serious. Authorize the testing today. Time is not on our side.

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Testimony On Proposed I-66 Spot 2 Improvements

I am Michael Nardolilli, President of the Arlington East Falls Church Civic Association (AEFCCA). As detailed in my lengthy letter that is already a part of these proceedings, the Arlington East Falls Church Civic Association urges the Transportation Planning Board to defer consideration of the proposed I-66 Spot 2 Improvements (Washington Boulevard to Dulles Airport Access Road) and not include this proposal in the 2007 Constrained Long-Range Plan (CLRP) and the FY2008-2013 Transportation Improvement Program (TIP). The AEFCCA believes that it is pre-mature to consider this important change to the CLRP and the TIP because the process to date has not considered --- or even acknowledged the existence of --- the seven year planning effort by Arlington County, the Washington Metropolitan Area Transit Authority (WMATA), the AEFCCA, and the Virginia Tech Department of Urban Affairs and Planning to plan the redevelopment of the area around the East Falls Church Metro stop (EFC Metro). These planning efforts for a pedestrian-friendly Transit Oriented Development have all identified the key need for coordinating road improvements around the station area --- including such proposals as the I-66 Spot 2 Improvements --- to accommodate the planned "Smart Growth" around the EFC Metro. By changing the CLRP and the TIP after only focusing on the traffic flow on I-66 and without even considering the impact such changes will have on those ongoing planning efforts strikes us as a classic example of the poor uncoordinated planning that the Transportation Planning Board was created to avoid.

Two detailed studies --- the Arlington East Falls Church Access Study (2002) and the Virginia Tech Metro Area Plan (2004) --- as well as the Metro Committee Survey (2005) all have indicated that any redevelopment of the station area must include significant changes to the road network --- including the ingress and egress to I-66 --- in order to support a pedestrian-friendly Transit Oriented Development around the site. And Arlington County is now in the process of developing a "small area plan" building on these previous studies. Yet, at the Citizen Informational Meeting --- in response to questions from the members of the AEFCCA --- the consultants (there appeared to be no representatives of the Virginia Department of Transportation present) confirmed that they were unaware of this seven-year planning effort and did not consider how the proposed Spot 2 Improvements would impact any planned redevelopment of the area.

Leaving aside our general inability to understand how the spot improvements could be justified as improving traffic flow on I-66 by just creating new bottlenecks, we are concerned that the failure to consider this ongoing planning process may have prevented alternatives from being properly considered. For example, AEFCCA has learned of the one-time existence of a "Proposal 2B" which would have placed the a new entrance ramp to I-66 West from Washington Boulevard underneath the Lee Highway overpass, thus helping to relieve congestion at the intersection of Lee Highway and Washington Boulevard. Proposal 2B seems to have been dismissed out-of-hand without even considering the effects such a ramp would have on that "pedestrian unfriendly" intersection and the proposed redevelopment of the Metro Site. And by only focusing on the traffic flow on I-66, the proposed Spot 2 Improvements did not take into account the need for traffic calming measures, pedestrian sidewalks and crossings and sound walls, and other mitigating measures that will be necessary if the area is to be made "pedestrian-friendly" in order to accommodate redevelopment of the Metro site.

In conclusion, it stands planning principles on their head to approve a multi-million project that could make permanent changes to the road network that could prevent the orderly redevelopment of the Metro site to provide for a true pedestrian-friendly Transit Oriented Development favored by our neighborhood.



GREATER WASHINGTON
Board of Trade

Statement of Jon Peterson
Greater Washington Board of Trade
to the
National Capital Region Transportation Planning Board
Honorable Catherine M. Hudgins, Chair
April 18, 2007

Chair Hudgins, members of the Transportation Planning Board. My name is Jon Peterson and I co-chair the Greater Washington Board of Trade's Transportation and Environment Committee. Thank you for your leadership of the Transportation Planning Board.

As you know, the Greater Washington region faces a future of increasing traffic congestion unless additional lanes of roadway, additional transit, new transit-oriented development, and better use of our existing infrastructure are accomplished. TPB's own forecasts demonstrate stop-and-go traffic on most of our region's major roads by 2030 unless there is significant construction of new transportation infrastructure.

Two projects to be considered today for air quality conformity analysis and later inclusion in the Constrained Long Range Plan are of critical importance in this matter: The I-395 / I-95 / HOV / Bus / HOT lanes proposal and spot improvements to I-66 inside the Beltway.

One of the Board of Trade's top transportation priorities is a region-wide system of HOT lanes. The proposed HOT lane project will be built within the existing I-

395 / I-95 right-of-way and will be financed by private investment and by tolls from those who chose to use the new improvements. An added benefit is that excess revenues will be designated to the Commonwealth to use for transit improvements within this transportation corridor – including new Park & Ride lots, new busses and other transit improvements as designated by the government.

This project will retain the option for anyone to keep using the existing general purpose lanes at no cost if they choose to. Also, carpools, vans and busses of three or more riders – including sluggers – will use the new HOT lanes at no cost. The new HOT lanes will be kept congestion-free by charging variable toll rates.

The second project providing key relief to traffic congestion is to move forward with spot improvements on I-66 inside the Capital Beltway. Providing relief from regularly occurring congestion on this section of I-66 is important both for potential future HOT lanes as well as to alleviate backups that result in wasted time, fuel, unnecessary air pollution and diversion of I-66 traffic onto Arlington's neighborhood streets. This project is also key in providing emergency evacuation of the District of Columbia in the event of future threats to Homeland Security.

We respectfully urge you to examine these important projects for air quality conformity analysis and for later inclusion in the 2007 CLRP.

Thank you for this opportunity to comment.

Statement by Robert P. Morgan for Presentation to the Transportation Planning Board
April 18, 2007

My name is Robert P. Morgan. My wife Nancy and I are Arlington residents. We live in a townhouse about as close to the westbound entrance ramp from Fairfax Drive onto I-66 as you can get. Before moving here in 1997, I was a professor for 30 years in the school of engineering at Washington University in St. Louis. Nancy is a past president of the Westwind Homeowners Association which opposes the widening of I-66.

I urge the TPB NOT to approve the I-66 inside the Beltway westbound spot improvements for air quality conformity testing.

The spot improvements amount to the de facto addition of a third travel lane to a significant portion of westbound I-66 inside the Beltway. Given that the spot improvements are likely to leave significant bottlenecks, taking this step could very well open the floodgates to even further widening, both westbound and eastbound. Widening, while not necessarily relieving traffic congestion, could very well induce increased traffic, not only on I-66 but also on local streets. VDOT's own IDEA-66 study indicates that there are other alternatives to widening that are as promising for relieving congestion but are less expensive. These alternatives, such as expanded HOV hours, were ignored by VDOT when they put forward widening as their preferred solution. In addition, widening would break faith with me, my wife, our neighbors and citizens of Arlington County who believed and continue to believe that the Coleman Decision meant what it said, namely that I-66 inside the Beltway would be restricted to two lanes in each direction.

My confidence in VDOT was shaken ever further when my wife and I attended a Public Workshop VDOT convened in Arlington on January 23, 2007 about the spot improvements, along with about 200 interested citizens. I was very upset by the way in which the Workshop was organized and handled. Rather than provide opportunities for citizen concerns and questions to be raised and addressed, the emphasis seemed to be on selling the proposed "spot improvements". A VDOT contractor made a brief presentation to the whole group and would take no questions. They then went to a small-group format with three biased, loaded questions for discussion.

One of these questions was: "What do you see as the benefits of the improvements being discussed?" Out of a total of 161 responses, nine out of ten respondents saw no benefits whatsoever to the so-called "spot improvements." The many emphatic responses to this question opposing the project are posted on VDOT's Idea-66 website.

My wife and I are especially concerned about the impact that the proposed spot improvements might have on the thin barrier of vegetative cover, on the noise levels, and on the bicycle/pedestrian path between our home and the highway. We could obtain no responses to these concerns at the VDOT Workshop.

Please do not approve VDOT's request. There is little, if any, independent oversight of VDOT's proposals and plans. That is why the TPB's role in this matter is so important.

Thank you for giving my views your consideration.

Robert P. Morgan PhD
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**Presentation to the National Capital Region Transportation Planning Board
April 18, 2007 Fred Millar, Ph.D. Friends of the Earth**

I am Fred Millar, a consultant to Friends of the Earth, a national environmental group, and former longtime member of the DC Local Emergency Planning Committee and former consultant to the DC Council. I appreciate the chance to put the NCPC/DDOT study in a very different, more urgent and more responsible perspective.

Despite sustained DC Council and citizen effort since the 9/11 attacks, **DC remains under a huge homeland security threat from ultrahazardous chemical rail cargoes** which chemical shippers currently send through DC by CSXT railroad. The chlorine industry says that just one accidental or terrorism-caused railcar rupture can result in a toxic gas cloud 40 miles over any city. Recent news from Iraq: terrorists have been honing their skills blowing up chlorine trucks as a terror weapon. I agree with the President on one thing: he says “the terrorists will follow our troops home.” And it will be relatively soon, if not soon enough. And we live in DC.

I. The National Capital Planning Commission’s forthcoming **Rail Realignment Study pretends to deal with this rail hazmat threat and, sadly, has taken \$1 million of the DC region’s UASI homeland security funds** to propose three ostensible rail routing alternatives. NCPC estimates each initially at \$4-\$5 billion, involving new construction of either a supposedly “secure tunnel” under the District or one of two possible new rail lines through Prince Georges and Charles Counties [Post “Study Proposes Rerouting Hazmat Trains to Maryland”, by Philip Rucker, 4 5 07]. NCPC has apparently summarily rejected an existing western route (Norfolk Southern) as a feasible alternative.

But here NCPC is merely re-cycling its longtime (last century, way pre-9/11) proposals to take **all rail freight and freight rail lines (noisy, dirty and with clearly 19th Century Rust Belt infrastructure) out of DC – for scenic and development purposes**. Explicitly, in its 1997 “Extending the Legacy” long-term DC plan “for the 21st Century”, NCPC projected a goal of “a unified, beautiful and equitable city”. The transportation part of that goal stated: “Removing the antiquated rail line...and relocating freight and passenger trains to a new tunnel underneath the Potomac will eliminate many disruptive barriers, including the ageing rail bridge over the Anacostia....[This] will create hundreds of acres of developable land ... [and] choice building sites in the heart of the city...-- the urban opportunity that many corporations and government agencies are looking for...[and] a visually coherent city.” (pp. 39-43). [In a cursory website inspection, NCPC’s previous work on security seems mostly focused on removing unsightly barriers to federal buildings and opening streets blocked for security reasons.] **What genuine DC regional homeland security needs (Interoperable radios? Siren systems? Re-routing incentives?) were not funded with the \$1 million NCPC spent?**

As proposed re-routing “solutions” for DC’s greatest homeland security risk, however, DDOT/NCPC’s current three alternatives would be **multi-billion dollar, multi-decade, and multi-jurisdictional. With multi-environmental impacts, they are bound to be hotly contested and so are thoroughly improbable.** It is utterly irresponsible and disingenuous to suggest them as a remedy for our rail homeland security vulnerabilities, and it distorts public perception in a way the railroads must find delightful. **We need to show DC residents a very different rail routing alternatives map than that in the Post story on the NCPC study, a map that looks west rather than east.**

II. NCPC rejects the only responsible way to protect DC, immediately available and comparatively very cheaply: to re-route the most dangerous through truck and rail chemical cargoes onto available non-target corridors running well west of DC-Baltimore-Philly. In 2005 on a 10-1 vote the DC Council enacted its new law mandating re-routing of the most dangerous through chemical cargoes around DC, fully intending to push CSXT to this sensible and cheap solution. At no time in the Council debate was the building of new rail lines east of the city ever seriously considered. DC was promptly sued by both CSXT and the railroad-friendly Bush Administration.

In order to comply with the DC ordinance, CSXT could have turned over (“interchanged”) only a tiny percentage (.07%) of its “I-95 Line” railcars to Norfolk Southern, which has a safer and available alternative industrial rail route 50 miles west of DC, roughly along the I-81 highway corridor, running through non-target areas (identified thus by the insurance industry maps supplied to the DC Council by AIR Worldwide consultants of Cambridge MA) such as Luray VA and Hagerstown MD. Similar routes around DC are also available to the north, for re-routing the hazmat cargoes on CSXT’s “Metropolitan Line” away from Northeast DC neighborhoods.

Emergency managers in Luray and Hagerstown agreed that using non-target lines through their towns was not “NIMBY”. Re-routing would not only eliminate the terrorism risk, but would also significantly reduce the potential consequences of an accidental release, e.g. of chlorine gas. Both CSXT and Norfolk Southern in court hearings adamantly “refused” to enter into the interchange agreements that would have re-routed the cargo. They testified that the Bush Administration was not making them re-route for homeland security purposes and that they would not do it voluntarily. In depositions, however, CSXT admitted that for their own commercial purposes they interchange cargoes with Norfolk Southern fully 1 ½ million times per year.

III. In the 2005 court hearing Federal District Court Judge Emmet Sullivan, appalled at the toxic gas cloud risk from just one chlorine railcar (“100,000 dead or injured in ½ hour”, according to the US Naval Research Labs), confidently quoted to the visibly upset railroad lawyers from the Federal Rail Safety Act, which supported DC’s right to regulate. FRSA says that “until” there are federal regulations on a specific topic, states

like DC can protect themselves, and he upheld the DC ordinance. [Documents at www.oag.dc.gov] The case is likely to be mired in Federal Appeals Courts, however, for many more months, if not years. And a near-term Congressional remedy seems unlikely.

Encouraged by DC's initial court victory, ten more major target cities (including Chicago, St Louis, Boston and Philadelphia) and the legislatures of three major chemical states (New York, Tennessee and Texas), have introduced re-routing ordinances closely modeled on the DC law. In 25 major cities TV investigative reports have demonstrated conclusively there is no security in the US rail system. Congress is also debating re-routing bills, but prospects are uncertain and under veto threat. Newly proposed US DOT "routing" regulations are easily revealed as shams, with the exact opposite goal.

Building a new freight rail route close to a major city (as NCPC/DDOT proposes) is very difficult, if not impossible, as seen in the recent huge resident and environmental uproar in (of all places) the Houston suburbs -- about a similar chemical industry proposal for a new rail route to give their Houston facilities competitive access, cheaper rail rates and better service. Senator Kay Bailey Hutchinson and Tom DeLay finally had to intervene and force a compromise rate-splitting solution that involved canceling any such gold-plated construction plans.

CSXT has two rail freight lines through DC, both dangerously close to the US Capitol. The "I-95 line", which some call the "photo-op line" because ABC-TV, NBC-TV, French national TV, etc. showed the chlorine tank cars passing with the US Capitol four blocks in the background, has after DC citizens and legislators raised a ruckus been "voluntarily" re-routed by CSXT. CSXT's "Metropolitan Line" reportedly still carries hazardous cargoes, and CSXT has never promised to re-route these. The line drops south into DC at Silver Spring, forms the eastern boundary of Catholic University, makes a sharp V-turn in Brentwood, just north of Gallaudet University and 20 blocks north of the US Capitol and -- without picking up or dropping off any cargo -- veers east out to Baltimore. Four blocks or 20 blocks is a small difference for a poison gas cloud.

The US railroads' arrogant recklessness in keeping DC and 45 other High Threat Urban Areas at huge security risk, railroad insiders have explained, stems not from concerns about cost or inconvenience, but from their desperation to avoid legal precedent for government "re-regulation" in their huge high-stakes economic battles with "captive shippers". DC and other high threat cities need to keep insisting that **available, existing alternative routes be used** to provide protective re-routing, despite a resistant railroad industry and President. **NCPC has missed this train. So return the \$1 Million.**

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Exhibit 2-1

