### National Capital Region Transportation Planning Board

777 North Capitol Street, N.E., Suite 300, Washington, D.C. 20002-4290 (202) 962-3310 Fax: (202) 962-3202 TDD: (202) 962-3213

Item 7

#### **MEMORANDUM**

February 20, 2013

To: Transportation Planning Board

From: Ronald F. Kirby

Directory, Department of Transportation Planning

Re: Review of Comments Received on Project Submissions for Inclusion in the

Air Quality Conformity Assessment for the 2013 CLRP and FY 2013-2018 TIP

At the January 23, 2013 meeting the Board was briefed on the project submissions for the draft 2013 CLRP and the FY 2013-2018 TIP, which were released for public comment and agency review at the TPB Citizens Advisory Committee (CAC) meeting on January 17, 2013. This public comment period closed on February 16.

More than 450 comments were submitted by individuals, businesses and organizations over the course of the 30-day public comment period. These comments were posted to the TPB website at <a href="https://www.mwcog.org/transportation/public/comments.asp">www.mwcog.org/transportation/public/comments.asp</a>. The comments can be grouped into three broad categories:

- 1) More funding is needed for projects in Prince George's County;
- 2) General support for Northern Virginia's transportation projects; and
- 3) Opposition to the Alternative A of the "Improved Access to Dulles Airport" project.

#### 1) More Funding is Needed for Projects in Prince George's County

One (1) comment was received stating that more funding should be included for projects in Prince George's County and that the plan should favor support for Metro and more transit options over new roadway projects.

#### 2) General Support for Northern Virginia's Transportation Projects

Fifty-eight (58) comments were received expressing general support for the inclusion of Northern Virginia's projects in the Air Quality Conformity Analysis. These comments included letters of support from the Greater Washington Board of Trade, the Loudoun County Chamber of Commerce, and the Northern Virginia Building Industry Association. Most of the supportive comments endorsed the "Improved Access to Dulles Airport" project and the VA 28 Manassas Bypass Study (note: studies are not included in the Air Quality Conformity Analysis).

#### 3) Opposition to Alternative A of the "Improved Access to Dulles Airport" Project

A total of 395 comments were received in opposition to Alternative A of the "Improved Access to Dulles Airport" project. These comments included a letter from the Brambleton Group community association. The following points were raised in the comments:

- The Virginia Department of Transportation (VDOT) has not provided sufficient information on the cost estimates for the two alternatives to enable the public to comment effectively.
- Alternative A would create adverse environmental and aesthetic impacts along the Broad Run floodplain.
- This road will create a negative impact on Loudoun County's future property tax revenue, as the economic development opportunity on commercial property will be deferred and ultimately could be lost forever.
- This road will create a negative long-term transportation impact since it will not improve commuting patterns.
- A recent amendment to the Virginia constitution prohibits the taking of property via eminent domain for economic development purposes, which may make the acquisition of right-of-way for the project impossible.
- More viable and less costly alternatives exist, including using existing rights-of-way along US 50 and the Loudoun County Parkway.

Attached to this memo are copies and samples of the letters, postcards and emails received by midnight on February 16. All comments received during the comment period can be viewed on the web at <a href="https://www.mwcog.org/transportation/public/comments.asp">www.mwcog.org/transportation/public/comments.asp</a>.



January 19, 2013

The Honorable Scott York, Chairman National Capital Region Transportation Planning Board 777 North Capitol Street NE Suite 300 Washington, DC 20002-4239

#### Dear Chairman York:

On behalf of the Loudoun County Chamber of Commerce and our 1,150 member businesses, I submit this letter of support for the inclusion of several Northern Virginia transportation infrastructure projects in the Transportation Planning Board's Financially Constrained Long-Range Plan. These projects will help relieve congestion, improve mobility and strengthen the economic vitality and quality of life in our region.

The Loudoun County Chamber considers investments in our region's transportation infrastructure one of its top priorities, and improving our regional transportation network as essential for sustained regional prosperity. The Loudoun County Chamber urges the National Capital Region Transportation Board to endorse the following projects for air quality analysis and inclusion in the 2013 update to the Region's Financially Constrained Long-Range Plan and FY 2013-2018 Transportation Improvement Program.

#### LOUDOUN/PRINCE WILLIAM

- New Dulles Airport Connector Road
  - A 4-lane link from Northstar Blvd north of Route 50 to Loudoun County Parkway;
  - A new limited access, grade separated facility along Route 50 between the Bi-County Parkway and Route 606.
- Manassas Bypass A new 4 –lane facility from Route 234 at Godwin drive around the City of Manassas to I-66. (Tri-County Parkway Comp Plan Alignment).
- New Dulles Greenway Ramp At (planned) Hawling Farm Blvd. near Leesburg

#### **FAIRFAX/TYSONS**

- Dulles Toll Road -- New Ramps at Boone Blvd. and Greensboro Drive
- Route 7 Widen between Capital Beltway and I-66
- I-495 Express Lanes Increase from 2 to 4 the number of lanes in the proposed Express Lanes extension between Old Dominion Drive and the GW Parkway.
- Capital Beltway/Dulles Corridor Ramps Construct new and improve existing ramps.

Thank you!

Sincerely

Tony Howard

President & CEO

Loudoum County Chamber of Commerce

Physical Address: 19301 Winmeade Drive, Suite 210 Lansdowne, VA 20176 Mailing Address: P.O. Box 1298 Leesburg, VA 20177-1298 703 777 2176 703 777 1392 fax www.loudounchamber.org



January 23, 2013

Hon. Scott York Chairman National Capital Region Transportation Planning Board 777 North Capitol St., NE - Suite 300 Washington, DC 20002

RE: Proposed Significant Changes for 2013 CLRP Update

Dear Chairman York:

The Greater Washington Board of Trade strongly supports the following project submissions for air quality conformity assessment for the 2013 Constrained Long Range Plan and the FY 2013-2018 Transportation Improvement Program.

Project submission 12, "Improved Access to Dulles Airport" consisting of:

- 1) Dulles Air Cargo, Passenger and Metro Highway Access from US Route 50 (John Mosby Highway) to VA Route 606 (Loudoun County Parkway) as well as,
- 2) Construction of new Limited Access Routes along US 50 (John Mosby Highway) and VA 606 (Loudoun County Parkway)

Both of these projects will help improve access to Dulles Airport.

Project submission number 13 "Virginia 28 Manassas Bypass Study from VA 234 to I-66". These improvements will provide much improved access to Dulles from the Prince William Parkway to I-66 and Route 28.

We also respectfully request the opportunity to discuss the District of Columbia's submissions 1 "Land Reductions and Reconfigurations" and 2 "Bike Lane Pilot Studies." Both submissions involve some level of reduction in vehicular travel lanes in order accommodate traffic-calming, bike lanes, peak-period buses, or pedestrian trails.

Finally, we request the opportunity to address the synchronization and timing of traffic signals in a region-wide coordinated manner.

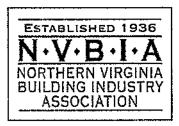
Thank you for your attention to this most important issue.

Sincerely.

James C. Dinegar, CAE

President and CEO

Greater Washington Board of Trade



January 23, 2013

The Honorable Scott York, Chairman National Capital Region Transportation Planning Board 777 North Capitol Street NE Suite 300 Washington, DC 20002-4239

Dear Chairman York:

The Northern Virginia Building Industry Association (NVBIA) represents more than 500 businesses and thousands of their employees.

The NVBIA considers transportation one of its top priorities and improving our regional transportation network is essential for sustained regional prosperity.

The NVBIA urges the National Capital Region Transportation Board to endorse the following projects for air quality analysis and inclusion in the 2013 update to the Region's Financially Constrained Long-Range Plan and FY 2013-2018 Transportation Improvement Program.

#### LOUDOUN/PRINCE WILLIAM

- New Dulles Airport Connector Road VDOT to look at two alternatives to improve Airport access:
  - o A new 4-lane link from Northstar Boulevard north of Route 50 to the Loudoun County Parkway and;
  - A new limited access, grade-separated facility along Route 50 between the Bi-County Parkway and Route 606.
- Manassas Bypass A new 4-lane facility from Route 234 at Godwin drive around the City of Manassas to I-66. (Tri-County Parkway Comp Plan Alignment).
- New Dulles Greenway Ramp At (planned) Hawling Farm Boulevard near Leesburg

#### PRINCE WILLIAM

• US 1 – Widen from 4 to 6 lanes from Lorton Road to Annapolis Way.

#### FAIRFAX/TYSONS

- Dulles Toll Road -- New Ramps at Boone Boulevard and Greensboro Drive
- Route 7 Widen between Capital Beltway and I-66
- I-495 Express Lanes Increase from 2 to 4 the number of lanes in the proposed Express Lanes extension between Old Dominion Drive and the GW Parkway.
- Capital Beltway/Dulles Corridor Ramps Construct new and improve existing ramps.

#### RESTON/TYSONS

• **Dulles Toll Road Collector-Distributor Roads** – Parallel to Dulles Toll Road between Wiehle Ave. and Spring Hill Road.

#### ARLINGTON/ALEXANDRIA/FAIRFAX/PRINCE WILLIAM

• I-395 - Add fourth southbound lane between Duke Street and Edsall Road

These Northern Virginia projects are vital to the economic development of our region and essential to the business goals of our members.

Thank you for considering our concerns.

Sincerely,

Mark D. Trostle

NVBIA President - 2013

# ● ● ■ THE 2030 GROUP

February 12, 2013

The Honorable Scott York, Chairman National Capital Region Transportation Planning Board 777 North Capitol Street NE Suite 300 Washington, DC 20002-4239

#### Dear Chairman York:

The 2030 Group is an organization of Washington Metropolitan area business leaders focused on advancing regional long range decision making and solutions that enable a strong regional economy, strengthen continued employment opportunities, sustain economic development, and ensure high quality of life for current and future residents.

The 2030 Group's focus has been on regional transportation and infrastructure, education and workforce training and future housing densities and products.

Clearly, an efficient, well-connected multimodal regional transportation network is fundamental to the region's future prosperity and quality of life.

There will be a number of regional priorities the 2030 Group will address later this spring when our Transportation Initiative will be released. In the meantime, the 2030 Group believes that the following additional projects being advanced for air quality analysis and inclusion in the 2013 update to the Region's Financially Constrained Long-Range Plan (CLRP) and FY 2013-2018 Transportation Improvement Program (TIP) have strong merit:

- New Dulles Airport Connector Road —A new 4-lane link from Northstar Blvd north of Route 50 to the Loudoun County Parkway.
- Manassas Bypass A new 4 –lane facility from Route 234 at Godwin drive around the City of Manassas to I-66.
- US 1 Widen from 4 to 6 lanes from Lorton Road to Annapolis Way.
- Dulles Toll Road -- New Ramps at Boone Blvd. and Greensboro Drive
- Route 7 Widen between Capital Beltway and I-66
- I-495 Express Lanes Increase from 2 to 4 the number of lanes in the proposed Express Lanes extension between Old Dominion Drive and the GW Parkway.
- Capital Beltway/Dulles Corridor Ramps Construct new and improve existing ramps.
- Dulles Toll Road Collector-Distributor Roads Parallel to DTR between Wiehle Ave. and Spring Hill Road.
- I-395 Add fourth southbound lane between Duke Street and Edsal Road

Of the above projects, the 2030 Group believes the new 4-lane line between Northstar Blvd north of Route 50 to the Loudoun County Parkway is especially important.

Washington Dulles International Airport is the National Capital Region's gateway to the world. Studies conducted by the Commonwealth of Virginia, George Mason University, our organization and many others also have shown that Dulles is a major economic engine for the entire metropolitan region.

Ensuring good future access to Dulles Airport is essential if the airport and the National Capital Region are to achieve their economic potential. Currently, the Airport enjoys good access from the east and such access will improve further with the completion of the Silver Line. However, access from the north, south and east. The provision of a new limited access connector between the planned Bi-County Parkway and Northstar Blvd. is essential to future airport passenger and freight access.

If there is one lesson learned in recent decades is that failure to protect all viable transportation options is the formula that has led our region to become the nation's worst traffic congestion nightmare. Testing and placing this facility in the 2013 CLRP update and FY 2013-2018 TIP are smart investments in our region's future.

Sincerely,

Robert E. Buchanan

Chert E)

President/



February 15, 2013

National Capital Region Transportation Planning Board 777 North Capitol Street NE Suite 300 Washington, DC 20002-4239

To whom it may concern,

I write today on behalf of Brambleton in response to the request for public input on several Northern Virginia projects being considered for inclusion in the 2013 fiscally Constrained Long Range Plan (CLRP) and FY 2013-FY 2018 Transportation Improvement Program (TIP). Specifically, we provide our input as it relates to project 11: "Improved Access to Dulles Airport."

As supported by the attached (and just updated) letters, the analysis of proposed Alternative II of the Dulles Airport Access road is wholly incomplete at best and based on inaccurate and manipulated data at worst. In either case, the TPB should not support this road and its alignment for the following reasons:

- 1. Alignment II requires acquisition of a significant area of property from Brambleton, as well as others. The recent Virginia constitutional amendment prohibits the use of eminent domain for the purposes of acquiring property for economic development purposes, such as improving air cargo access to Dulles Airport. As a result of this constitutional amendment, the state must have Brambleton's consent and agreement (which VDOT does not and will not have). Putting a road alignment on any long- or short-range plan that cannot be constructed is a failure of planning.
- There are multiple other alternatives, including the use of existing right-ofway along Route 50 and Loudoun County Parkway that would achieve the same objectives at far less cost and impact as the proposed Alternative II.
- 3. The environmental impacts of Alternative II are diverse and frankly, devastating, along the Broad Run floodplain.
- 4. The costs of acquiring any right-of-way for this road in addition to the costs of multiple grade-separated interchanges and bridge structures necessary to effectuate the road as contemplated are excessive.

5. Though the stated purpose of this proposed road is to "enhance the movement of people, passenger services and air cargo traffic to Washington Dulles International Airport and the planned Phase 2 extension of the Metrorail Silver Line," it will compromise and, in many cases, completely eliminate jobs that have been long planned in this part of Dulles South.

Asking the public for comment without full and complete disclosure of the data and planning principles employed is meaningless. We have asked for this and other information from VDOT but have not yet received any additional information. The public cannot give any intelligent comments until VDOT discloses the details supporting the broad conclusions VDOT has provided regarding this project. Proceeding forward without making this information available to the public is contrary to the idea of open government.

VDOT claims that Alternative II (also referred to as Alternative A in the CLRP) will cost only \$153 million; an amount that it asserts is \$660 million less than the cost of Alternative III (also referred to as Alternative B in the CLRP). Yet, VDOT has given neither basis nor detail to justify or explain this enormous discrepancy. It would appear that these two alternatives may have been inflated (Alternative B) and deflated (Attentive A) to engineer an outcome and stifle a fair, reasonable and accurate consideration of Alternative II.

An opinion without a basis is worth little. VDOT has asked the public to comment on opinions or conclusions without disclosing the basis of those opinions. It is time for VDOT to disclose the details behind its claims and to give the public an opportunity to provide informed and meaningful comment on a very important issue, one that will cost the taxpayers millions of dollars and force other individuals to surrender their homes, farms, businesses, and places of worship. No decision should be made until VDOT gives the taxpayers the information to which they are entitled.

In support of our position, attached are additional comments, studies and potential alternatives that have not been (and certainly should be) evaluated.

In conclusion, our requests are simple, straight forward and we respectfully submit, reasonable. We ask that all interested parties and government agencies expand the Corridor study to the south (of Alternative II, in particular) and immediately begin the process of exploring additional alternatives (such as those that we are proposing and other viable options as well). We'd suggest a meeting immediately with representatives of VDOT, Loudoun County, the Airport and other key decision makers (such as representatives from the Loudoun County Board) so that we can try and work together openly and cooperatively for the good of the Commonwealth, Loudoun County, the Airport, and the businesses and residents of Loudoun County.

We are happy to discuss further at any point. Please call or email if you have any questions.

Sincerely,

Stephen T . Schulte, P.E.

548252 v1/R1:



Colleen Gillis Snow T: +1 703 456 8114 gillissnow@cooley.com

February 5, 2013

The Honorable Kenneth Cuccinelli, Attorney General Commonwealth of Virginia
Office of the Attorney General
900 East Main Street
Richmond, VA 23219

RE: 2012 Constitutional Amendment and Dulles Airport Access Road

Dear Mr. Cuccinelli:

As you may know, we represent the Brambleton Group on their very attractive and successful community in Loudoun County. Since its initial approval nearly twenty years ago, Brambleton has become not only one of the region's most desirable communities, but the nation's 6<sup>th</sup> best-selling community in 2011. It has received numerous accolades for planning, landscaping, community amenities and has been long recognized as an important county partner, providing three elementary school sites, a high school site, acres of park land and miles of transportation improvements.

Given Brambleton's record of working with Loudoun County, VDOT and others, it was deeply troubling to learn of the proposed Dulles Airport Access Road that has been contemplated for the southern portion of the Brambleton community. I write today to underscore Brambleton's objections to the alignment of this road and to raise questions about the ability of the Commonwealth to effect an eminent domain taking of this right-of-way, given the recent amendment of Section 11 of Article 1 of the Virginia Constitution.

By way of brief summary, the Virginia Department of Transportation recently and suddenly initiated a planning effort to study two possible routes for the purpose of "support[ing] Dulles Airport's plan to expand into a cargo hub for the East Coast and bring economic growth and jobs to Loudoun County and Virginia." One alignment proposes the use of Route 50 (existing or to-be widened) as an east-west connection between Northstar Boulevard and Dulles Airport. The other route proposes the creation of a new limited-access road between Northstar Boulevard and Dulles Airport, the crossing of several "fingers" of the Broad Run floodplain and the necessary addition of new interchanges and infrastructure that is neither on the Loudoun Countywide Transportation Plan nor part of any Corridor of Statewide Significance. (See Exhibit A)

Brambleton expressly objects to the second alignment set out above. A road in this location will decimate plans for the construction of millions of square feet of non-residential development along Brambleton's southern boundary. It will preclude the creation of another Northern Virginia Community College campus adjacent to Loudoun County Parkway, a location that has been considered and embraced by NVCC in recent months. However, even if the state is unwilling to



February 5, 2013 Page Two

abandon further consideration of this road given all of the good planning reasons, the constitutional amendment prohibits the acquisition of this property by eminent domain without Brambleton's express consent.

#### 2012 Constitutional Amendment

On November 6, 2012, Virginia voters overwhelmingly approved an amendment to the Virginia Constitution which expands property owners' protections from overreaching eminent domain takings beyond what was already provided for in Virginia Code § 1-219.1.

The amendment is clear; "a taking or damaging of private property is not for public use if the primary use is for private gain, private benefit, private enterprise, increasing jobs, increasing tax revenue, or economic development...." It is abundantly clear from the presentations given by VDOT, the alignment of the road itself and the information disseminated by VDOT and MWAA that this road's sole purpose, as a limited-access road no less, is the creation of additional economic development for Dulles Airport. A taking for the purposes of generating economic development is, on its face, a prohibited taking.

This taking is exactly the type of taking that the Virginia voters sought to protect property owners from. Obliterating millions of square feet of non-residential development and eliminating the opportunity for enhancing the Brambleton community with the addition of a college campus in favor of the remote possibility of creating a cargo business at Dulles Airport is not an appropriate or constitutional use of eminent domain. Moreover, it was exactly what the General Assembly in 2007 and Virginia voters in 2012 sought to prevent.

Just as VDOT has been clear that this road is being studied for the purposes of increasing economic development at Dulles Airport, the Constitutional Amendment is equally clear. The acquisition of private property by eminent domain as proposed is unconstitutional.

We urge you to immediately advise the Virginia Department of Transportation of the constitutional limitations on their efforts with regard to this road. Brambleton stands ready to take any and all actions it needs to take in order to avail itself of the constitutional and statutory protections. If you have any questions or would like to discuss further, please do not hesitate to call or email.

Sincerely

Colleen Gillis Snow

CC:

The Honorable Robert McDonnell, Governor, Commonwealth of Virginia The Honorable Sean Connaughton, Secretary of Transportation, Chairman,

Commonwealth Transportation Board The Honorable Scott York, Chairman, Loudoun County Board of Supervisors

The Honorable Shawn Williams, Vice Chairman, Broad Run District Supervisor, Loudoun County



#### February 5, 2013 Page Three

The Honorable Janet Clarke, Blue Ridge District Supervisor, Loudoun County
The Honorable Matt Letourneau, Dulles District Supervisor, Loudoun County
The Honorable Geary Higgins, Catoctin District Supervisor, Loudoun County
The Honorable Suzanne Volpe, Algonkian District Supervisor, Loudoun County
The Honorable Ken Reid, Leesburg District Supervisor, Loudoun County
The Honorable Ralph Buona, Ashburn District Supervisor, Loudoun County
The Honorable Ralph Buona, Ashburn District Supervisor, Loudoun County
Gregory Whirley, Vice Chairman, Commonwealth Transportation Board
Gary Garczynski, Northern Virginia District, Commonwealth Transportation Board
Hollis Ellis, At-Large Urban Member, Commonwealth Transportation Board
W. Sheppard Miller, III, At-Large Urban Member, Commonwealth Transportation Board
W. Sheppard Miller, III, At-Large Urban Member, Commonwealth Transportation Board
David Tyerar, Deputy Secretary of Transportation and Chief Financial Officer
The Honorable Joe May, Delegate, Commonwealth of Virginia
The Honorable Thomas Greason, Delegate, Commonwealth of Virginia
The Honorable Barbara Comstock, Delegate, Commonwealth of Virginia
The Honorable Mark Herring, Senator, Commonwealth of Virginia
The Honorable Richard Black, Senator, Commonwealth of Virginia
The Honorable Richard Black, Senator, Commonwealth of Virginia
John Muse, District Environmental Manager, Virginia Department of Transportation
William R. Fox, Brambleton Group
Stephen T. Schulte, P.E., Brambleton Group
Antonio J. Calabrese, Esq., Cooley LLP



February 4, 2013

Mr. Tom Fahrney Project Manager Virginia Department of Transportation Northern Virginia District 4975 Alliance Drive Fairfax, Virginia 22030

Subject:

"Improving Access to Dulles Airport"

Dulles Air Cargo, Passenger, and Metro Access Highway

Citizen Information Meeting #1 Comments

Loudoun County, Virginia

Dear Mr. Fahrney,

As the long-time Transportation Consultant for the Brambleton Community, other significant projects in Loudoun County, and the Northern Virginia region, we want to thank the Virginia Department of Transportation (VDOT) for providing initial information regarding a Locational Study and Environment Assessment (EA) being prepared by the department for a proposed limited access highway between Route 50 and the Washington Dulles Airport.

We understand that the following three alternatives are being evaluated:

- I. No Build (Alt I);
- 2. Tri-County Parkway extension north of Route 50 and east towards the Airport (Alt 2), and;
- 3. Elevated roadway from Tri-County Parkway eastward along Route 50 and northward, parallel to Loudoun County Parkway (Alt 3).

Recognizing that comments are due February 6<sup>th</sup> for the January 24<sup>th</sup> Citizen Information Meeting, the following concerns, questions, and considerations are provided:

#### Item 1: Purpose and Need

We understand the purpose and need for the project is:

- a. To enhance the movement of people, passenger services, and air cargo to Dulles International Airport and WMATA Metro Silver Line by providing a limited access roadway.
- b. Reduce congestion and improve capacity on the existing roadway network in the Dulles South Area.

Based on the limited information provided at the public meeting, we understand the traffic model being used to analyze the alternatives is the same one used with the Tri-County Parkway Location Study. Given this information, the transportation model is assumed to already include the growth and traffic demands anticipated for the Airport, the Metro Station, and approved commercial properties around the airport to confirm the roadway's "Purpose and Need".

- 1. What is the growth expected in jobs (square feet), for Airport and Metro passengers, and cargo?
- 2. What decrease in growth is estimated with Alternative 2? The alternative would remove approximately 2.0 million square feet of commercial space. Does the net increase justify or provide a positive cost-benefit?
- 3. What are the "trips" expected for these uses that generate the need for four lanes? Since this information was part of the model that has already been run, forecasts should have been provided as initial information to support the purpose and need of the project.
- 4. Metropolitan Washington Council of Governments (MWCOG) uses 72,000 trips per day as the capacity of a limited access, four-lane roadway. Is the Airport expecting 43,000 to 64,800 trips per day (Level of Service C-D)?
- 5. What portion of those trips Metro?
- 6. As the growth was anticipated previously, it is assumed the access from Route 28 and Route 267 was the entry points. What decrease is expected on other regional routes? An additional north-south route was touted as the purpose and need for the Tri-County Parkway.
- 7. How will Metro trips get to the Route 606 Station? Is an interchange planned at the Dulles Access Road at the confluence of Loudoun County Parkway and Old Ox Road? The access road is shown as a crossover with no Route 606 access in the exhibit provided to the Loudoun County Board of Supervisors, so it is not clear the initial

intent was to provide access to Metro yet this is part of the purpose and need of the project.

#### Item 2: Alternatives

The EA scope is being limited to two build options which at the level presented demonstrates significant impacts on the environment, requiring the preparation of an Environmental Impact Statement (EIS). An EIS would be the appropriate review according to 23 CFR 771.119 (i) and would be expected to review additional alternatives to satisfy National Environmental Policy Act (NEPA) requirements which indicates "a representative number of reasonable alternatives must be presented and evaluated in detail in the draft EIS (40 CFR 1502.14(a))."

Federal Highway Administration NEPA documentation also indicates care should be taken to avoid unnecessarily specifying features which preclude cost-effective, final design options. This is the case presented for Alternative 3 with an elevated Route 50 alignment and inclusion of a parallel roadway within the Airport. As presented in the MWCOG Constrained Long Range Plan (CLRP) project descriptions (see Exhibit A), a cost is provided for Alternative 3 of over 800 million dollars. This cost appears to be inflated by the elevated section and length of the project. This cost potentially includes adding an additional elevated section to the interchanges already planned along the corridor rendering the alternative impractical and with limited feasibility. Access to the southern portion of the Airport provides the required access and internal roadways would be required by the Airport that should not be included in the cost for Alternative 3.

- 8. Why was an elevated section proposed for Alternative 3?
- 9. How is local access going to be provided?
- 10. What are the impacts of putting the four lane section at grade? An independent review indicates a right-of-way of 210 feet would allow a four-lane limited access roadway within a six-lane limited access Route 50 section, requiring 5 feet of right-of-way on each side of the planned 200 foot right-of-way. An at-grade access road should be evaluated as a separate, feasible alternative.

The public was told this project is "stand alone", but is part of and contingent upon other roadway links being planned and studied (i.e. Tri-County Parkway and Dulles Loop Road).

11. Why is the study scope confined to just north of Evergreen Mills Road (Route 621) and north of Route 50 between Loudoun County Parkway and the extension of Northstar Boulevard when it is clear the majority of the demand is from the south from I- 66 via

the Tri-County Parkway given Route 50 west of the project is, and planned to be, a two lane roadway. In addition, the western portion of Loudoun County in not expected to have tremendous growth given its rural zoning and roadways. Growth in the Winchester and West Virginia panhandle would likely use Routes 7 to 267 and or Routes 81, I-66 to Route 234 Bypass/Tri—County Parkway.

- 12. Given the majority of the demand is to and from the south, Alignment G-F from the DEIS for the Tri-County Parkway should be included as a variable and reasonable alternative for the Dulles Access Road (See Exhibit B). Alignment G-F provides similar operational improvements when compared to Alignment D as stated in the DEIS and serves the same and more direct function as Alternative 2 without a decrease in commercial property and environment impacts. In addition, a limited access Tri-County Parkway north of Braddock Road may prove to be problematic given adjacent development access. The Loudoun County Parkway section of Alignment G-F may be more advantageous to a limited access facility. Northstar Boulevard would still be in place to provide additional north-south access as envisioned in the CTP.
- 13. The EA or EIS should evaluate.... <u>if</u> a limited access roadway north of Braddock Road <u>cannot</u> be implemented, would the project's "Purpose and Need" still be satisfied, in particular for cargo.

According to the Loudoun Countywide Transportation Plan (CTP), Route 50 is planned as a limited access roadway with interchanges at Northstar Boulevard (Tri-County Parkway), Arcola Boulevard, and Loudoun County Parkway (See Exhibit C). A six lane, divided limited access roadway has a capacity of roughly 114,000 vehicles per day. A four lane limited access Dulles Access Road and a four lane limited access Route 50 would provide a capacity of 144,000 vehicles per day.

- 14. What is the operation of a four-lane plus four-lane general purpose limited access, atgrade section for Route 50? An elevated section along Route 50 is not necessarily required given that a decrease in trips on the Route 50 general purpose lanes would be expected with the access road. Elimination of two lanes would allow the Dulles Access Road to fit within the planned 200 foot right-of-way and should be evaluated as an additional alternative.
- 15. Why is the future CTP Arcola Boulevard alignment not being considered as an alternative?

In summary, the EA process should be converted to the EIS process due to the significant impacts of Alternative 2. Once all reasonable alternatives have been evaluated, it is our belief Alternative 2 would be eliminated from detailed study and not carried forward in the Final EIS.

The following additional alternatives for the Dulles Airport Limited Access roadway should be considered with the EIS:

- Alternative 4: Tri-County Pkwy to Route 50 to Southern Airport property at-grade (CTP Six Lane General Purpose Lanes).
- Alternative 5: Tri-County Pkwy to Route 50 to Southern Airport property at-grade (CTP Amended Four Lane General Purpose Lanes).
- Alternative 6: Tri-County Pkwy Alignment G F (Loudoun County Parkway) to Route 50 and to Southern Airport property.
- Alternative 7: Tri-County Pkwy to Route 50 to Arcola Boulevard at-grade to Airport Access near confluence of Loudoun County Parkway and Route 606.

We support additional roadway improvements in the Dulles South area and look forward to assisting the department in achieving the best connection for the Airport, surrounding properties, and Metro. Should you have any questions, feel free to contact us at 703-443-1442 or cturnbull@miwells.com.

Sincerely

Christopher Turnbull Vice President

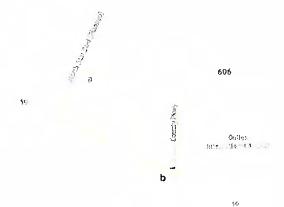
Attached: Exhibit A = MWCOG Constrained Long Range Plan (CLRP) project descriptions

Exhibit B - Alternatives

Exhibit C - Loudoun County CTP

### 12. Improved Access to Dulles Airport

Two alternatives are currently being considered for improving access to Dulles Airport, particularly for air cargo. Both alternatives will be examined during the TPB's air quality conformity analysis. Prior to TPB's approval of the 2013 CLRP Update, VDOT will be required to select one of the two alternatives for inclusion in the Plan.



a. Dulles Air Cargo, Passenger and Metro Access Highway from US 50, John Mosby Highway to VA 606, Loudoun County Parkway

Click map for larger image.

Construct a new four-lane facility (on a six-lane right of way) between the intersection of the planned Tri-County Parkway at US 50 and the Loudoun County Parkway at the western end of the Dulles Airport grounds first heading north, then east just south of Broad Run.

Complete: 2025
Length: 3 miles
Cost: \$153 million

Federal, State, Local, Private,

Funding: Bonds, Other

See the CLRP project description form for more information.

b. Construct new Limited Access Routes along US 50, John Mosby Highway and VA 606, Loudoun County Parkway

Construct a new, grade-separated, 4-lane limited access facility along US 50 (within existing right-of-way) between the planned Tri-County Parkway and the Loudoun County Parkway (VA 606). Also construct a new, at-grade, 4-lane limited access Loudoun County Parkway from the new grade-separated US 50 to 1.5 miles north of that.

Complete: 2025
Length: 4 miles
Cost: \$813 million

Federal, State, Local, Private,

Funding: Bonds, Other

See the CLRP project description form for more information.

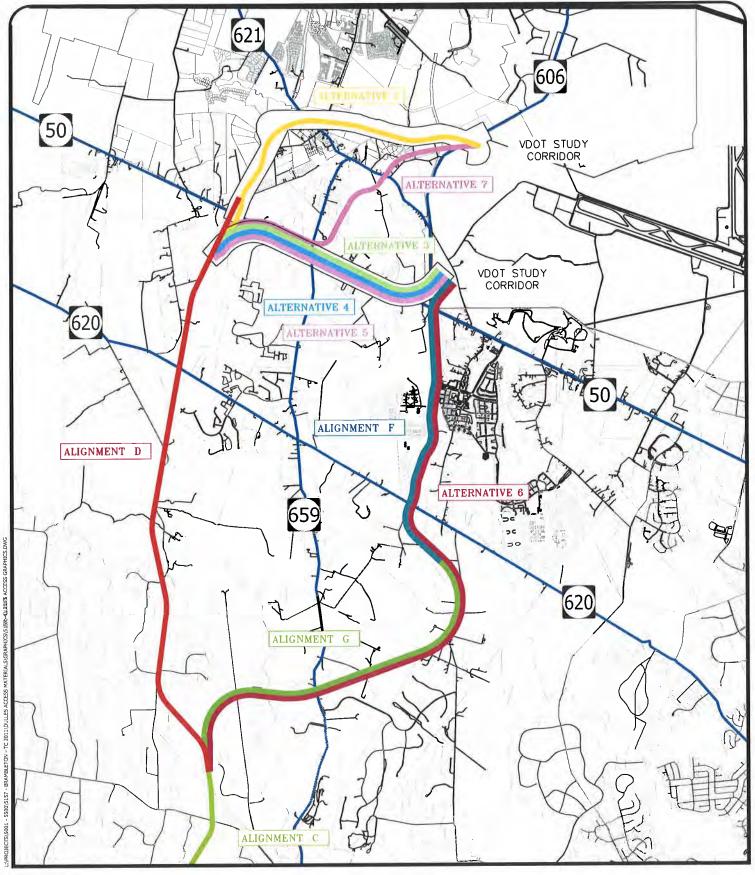
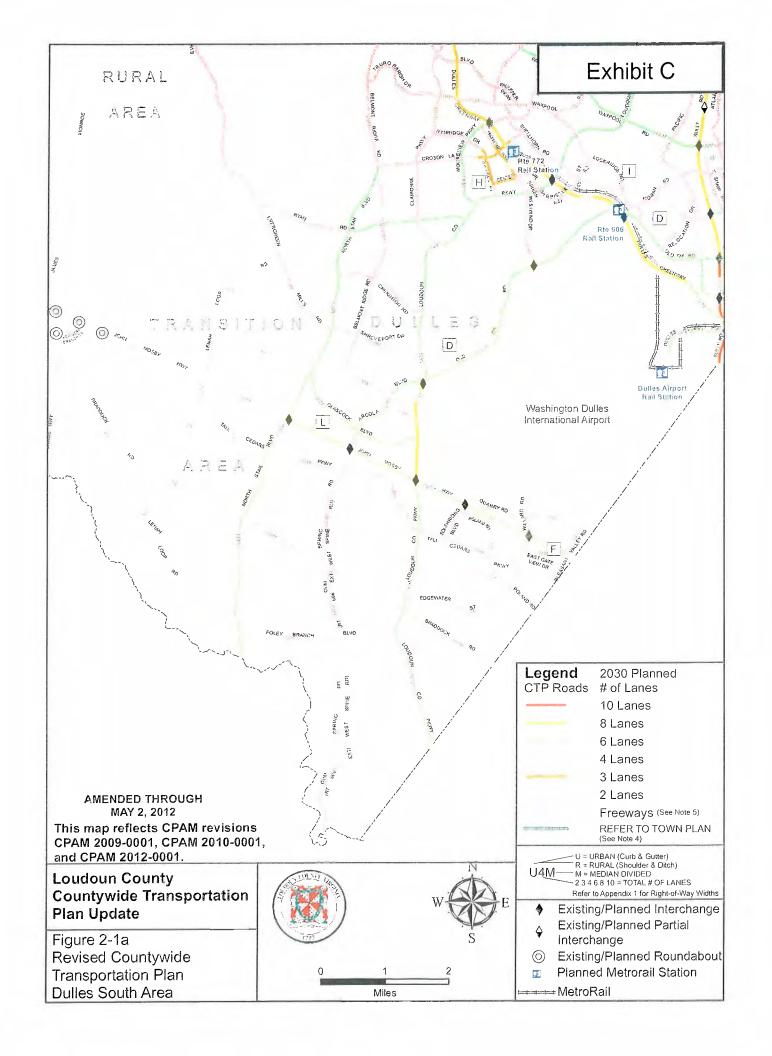


Exhibit B
Dulles Access Alternatives

SOURCE: ALT 2&3 - Jan 24, 2013 Environmental Assesment Public Meeting Alignments - March 16, 2005 Tri-County Parkway Draft EIS







February 5, 2013

Mr. Tom Fahrney VDOT Northern Virginia 4975 Alliance Drive Fairfax, VA 22030

Re: Improving Access to Dulles Airport: BCA Opposes Alternative 2

Dear Mr. Fahrney:

I am writing on behalf of the Brambleton Community Association (BCA) to express opposition to Alternative 2 of the Dulles Air Cargo, Passenger and Metro Access Highway. At their February 4, 2013 meeting, the BCA Board of Directors reviewed available information on the highway and the various alternative routes proposed for the road. They understand that there are three alternatives for this section of the highway; a no-build, Alternative 2 (or Brambleton option), and an Alternative 3 (or Route 50 option). In the limited time provided for thorough review, and despite the lack of publicly available information, Brambleton's Board has identified the following areas of concern:

**Economic Growth** - Brambleton has plans to develop the southern portion of the property with facilities and amenities that will benefit the entire community and region. These plans include both residential and business development and, a college campus that will bring significant economic development to the County and region. Alternative 2 as proposed will eliminate these opportunities which will greatly impact Brambleton, surrounding communities, Loudoun County and ultimately the Commonwealth.

Environmental Impact – The environmental impact of additional right-of-way (ROW) required by Alternative 2 is significantly greater that the No-build and Alternative 3 options. Acquiring the ROW for Alternative 2 will impact parcels containing more than 1,000 acres. The majority of the ROW is currently in place for Alternative 3. Why does VDOT feel it necessary to significantly impact wetlands and other environmental features to establish an entirely new ROW when the existing Route 50 ROW can be utilized? The study should include a focus on how to better use the existing Route 50 ROW to access the airport that will minimize the environmental impacts.

Route 50 Limited-Access – Route 50 is already planned to be a limited-access highway on the Loudoun County Transportation Plan. This has been on the County plan for years, providing those purchasing property within the County with direction regarding future development plans. Why is it necessary to add a second limited-access highway in this region of the County? How

will two limited-access highways directly adjacent to each other impact the local traffic and its ability to get around?

Use of Airport Property – The shortest distance to the airport property is to enter the property at the southwest corner near Route 50 and Route 606. Alternative 3 has VDOT studying a road that runs parallel to Route 606 for approximately two miles. This is adding to the cost of the project. The study should include the VDOT road closest to the airport border and then MWAA should be responsible for studying and funding the road on their property starting at the closest boundary to Route 50.

Meeting Notice & Location – Notice of the public meeting went out during the holiday season. This is a busy time of year and not an effective time of year to notice and hold a public meeting that has such great impact on property owners. More importantly, the meeting was held on the second floor of a facility that had no ADA accommodations. VDOT should be required to hold public meetings such as this in a facility that all citizens have access to. The BCA Board requests that an additional meeting be held in a facility that can accommodate all citizens. BCA is willing to offer up its community center at 42645 Regal Wood Drive in Brambleton as a way to provide appropriate facilities for a public meeting that all citizens can access.

Aesthetic Compatibility - In addition to losing the economic possibilities, a road such as this will impact Brambleton's aesthetics and overall beauty. Brambleton is known for its landscaping, berms, water features and natural beauty. The visual impact that the limited-access highway will have on the community will be great. In place of Brambleton's berms and landscape will be elevated concrete structures and noise barrier walls. These changes are not compatible with the existing landscape found throughout the community and will negatively impact the property values throughout the community.

Please note that as Brambleton's Board members, and the residents of Brambleton learn more about these proposals and the potential impact to Brambleton, they may identify additional concerns.

I want to reiterate that <u>Brambleton Community Association is opposed to Alternative 2</u> of the Dulles Air Cargo, Passenger and Metro Access Highway being studied by VDOT. While additional access to the Airport may be desired and bring economic development to the region, it is imperative that those benefits do not turn a blind eye to the local impacts and interests. Route 50 has been planned as a limited-access highway for years and should remain the only option to provide the desire western access to the airport. This can be accomplished with the least impact to the environment, existing & future local road networks, the adjacent communities and most importantly the residents of these communities.

Sincerely,

Richard Stone PCAM, LSM

General Manager, On Behalf of the BCA Board of Directors

Brambleton Community Association

Cc: The Honorable Robert F. McDonnell, Governor, Commonwealth of Virginia
The Honorable Sean T. Connaughton, Secretary of Transportation, Commonwealth of Virginia

The Honorable David Ramadan, Delegate 87<sup>th</sup> District, Commonwealth of Virginia Loudoun County Board of Supervisors

William Fox, Chief Operating Officer, Brambleton Group LLC Brambleton Community Associations Board of Directors

Kenneth Chadwick, Chadwick Washington Moriarty Elmore & Bunn P.C.

Brambleton Owners & Residents



PLANNERS ENGINEERS LANDSCAPE ARCHITECTS LAND SURVEYORS

February 15, 2013

National Capital Region Transportation Planning Board (TPB) Metropolitan Washington COG Suite 300 777 North Capital Street, NE Washington, DC 20002

RE: **Improving Access to Dulles Airport** 

Dear Members of the TPB.

It is my understanding that the TPB is seeking public input on several transportation projects in Northern Virginia. This letter offers comments specific to Project 11 (Improving Access to Dulles Airport).

On behalf of the Brambleton Community, Urban, Ltd. (Urban) has prepared a preliminary evaluation of the possible access road alignments being proposed by the Virginia Department of Transportation (VDOT). We understand that the three alternatives being evaluated are as follows:

Alternative 1: No-Build

Alternative 2: Construct a new four-lane facility (on a six lane right-of-way) between the intersection of the planned Tri-County Parkway at US 50 and the Loudoun County Parkway at the western end of the Dulles Airport grounds first heading north, then east just south of Broad Run.

Alternative 3: Construct a new, grade separated, four-lane limited access facility along US 50 (within existing right-of-way) between the planned Tri-County Parkway and the Loudoun County Parkway. This alternative also includes constructing a new, at-grade, four-lane limited access Loudoun County Parkway from the new grade-separated US 50 to 1.5 miles north of that.

The following are the results of the preliminary analysis:

#### 1. Comparison of Road Segment Lengths

VDOT identifies the length of Alternative 2 as 3 miles and Alternative 3 as 4 miles. Based on Urban's analysis, Alternative 2 is approximately 3.56 miles and Alternative 3 is approximately 2.93 miles. Exhibits A & B depict the Urban alignments used in our study. VDOT's Alternative 3 length is much greater since it appears to include a segment of road internal to



the Airport from Route 50 to the north. For purposes of comparing the merits of each alignment, it is unclear why VDOT included the added length of internal Airport road (approximately 1.4 miles) since the evaluation should primarily be for road segment outside of the Airport limits. By including this added segment, VDOT's estimated costs for Alternative 3 are considerably inflated.

#### 2. "Compact" Road Section for Alternative 3

VDOT identifies a grade-separated facility along US 50 for Alternative 3 for the four limited access lanes. As identified on Exhibit A, Urban has worked with Brambleton's transportation engineer to develop a "compact" road section that could limit the amount of needed right-of-way and eliminate the internal elevated bridge structure as proposed by VDOT. In utilizing this "compact" road section, the limited access lanes to the Airport could be constructed at the same grade as the Route 50 through lanes which eliminates several thousand feet of bridge and would substantially reduce the estimated construction costs for Alternative 3.

#### 3. Comparison of Elevated Road/Bridge Structure Lengths

Urban has evaluated the approximate length of elevated road/bridge structures associated with each alignment. The location of the anticipated elevated road/bridge structures is depicted on Exhibit A. The results of the preliminary analysis are as follows:

Alternative 2: +/- 10,150 feet
Alternative 3 (using "compact" road section): +/- 5,290 feet

It is noted that the analysis does not include lengths of any elevated roadways and/or bridges associated with interchanges proposed on the Loudoun County Transportation Plan (CTP). The reasoning for this was to only assess the incremental additional impacts associated with the Dulles Airport access lanes and not any impacts associated with already approved County master plan interchanges.

It is evident from above that the costs for elevated road/bridge improvements will be much greater with Alternative 2. It is unclear whether the VDOT study takes this into consideration.

#### 4. Preliminary Property Impact Analysis

Urban has evaluated the number of properties impacted by Alternative 2 and Alternative 3. It is noted that a property was considered impacted if any portion of the parcel was within the proposed right-of-way and/or associated building setback (zoning requirement). Similar to the analysis of the elevated roadway/bridge structures, any impacts associated with CTP interchanges were not included. The following is the result of our preliminary property impact analysis:

Alternative 2: 46 properties impacted

Alternative 3: 33 properties impacted (with minimal expansion of the current

Route 50 right-of-way)



Please see Exhibit C for an illustration of the impacted properties.

#### 5. Conceptual Environmental Impact Analysis

Urban has evaluated the potential environmental impacts associated with each alternative. It is noted that our analysis was based on floodplain and potential wetland locations from Loudoun County GIS data. The following is the results of our preliminary environmental impact analysis.

Alternative	Floodplain Impacted (Ac.)	Possible Wetland Impacts (Ac.)
2	+/- 10.4	+/- 9.8
3	+/- 6.7	+/- 3.1

It is noted that the estimated area of impact was measured from 20 feet outside of proposed right-of-way (per the typical sections shown on Exhibit A) to account for grading. Impacts associated with proposed CTP interchanges were not included. It was assumed that any floodplain and/or wetland within existing right-of-way had already been disturbed and therefore not included as a new impact.

Please see Exhibit D for more detailed environmental impact information.

Based on the foregoing, it is evident that there are greater costs and significantly more property and environmental impacts associated with Alternative 2 compared to Alternative 3. While it is acknowledged that our analysis is preliminary and conceptual in nature, it does clearly show the magnitude of differences between the two alignments.

In conjunction with Brambleton's transportation design consultant (Wells & Associates), Urban has also explored additional possible alternatives for the Dulles Airport Limited Access roadway. Exhibit E depicts these alternatives as well as the VDOT Alternatives 2 and 3. The following identifies the additional alternatives that we recommend to also be considered.

- Alternative 4: Tri-County Parkway to Route 50 to southern portion of Airport property atgrade (CTP Six Lane General Purpose Lanes). This is consistent with the recommended "compact" section described earlier in this letter. VDOT's Alternative 3 has this same alignment but with elevated limited access lanes.
- Alternative 5: Same alignment as Alternative 4 but with Route 50 general purpose lanes reduced from 6 to 4. This would require an amendment to Loudoun County's Comprehensive Transportation Plan.
- Alternative 7: Tri-County Parkway to Route 50 to Arcola Boulevard at-grade to Airport access road near confluence of Loudoun County Parkway and Route 606.



We also believe that there are other possible alignments (in addition to those already describe in this letter) that merit consideration. Urban continues to explore additional alternatives which we will make available as they are developed.

We are hopeful that this information is beneficial as your evaluation for projects being considered for inclusion in the 2013 fiscally constrained Long Range Plan and FY 2013-FY 2018 Transportation Improvement Program. Should you have any questions or need additional information, please do not hesitate to contact me at 703-642-8080 or dmcelhaney@urban-ltd.com.

Sincerely, Urban, Lu

David T. McElhaney, P.E

Principal

#### Attached:

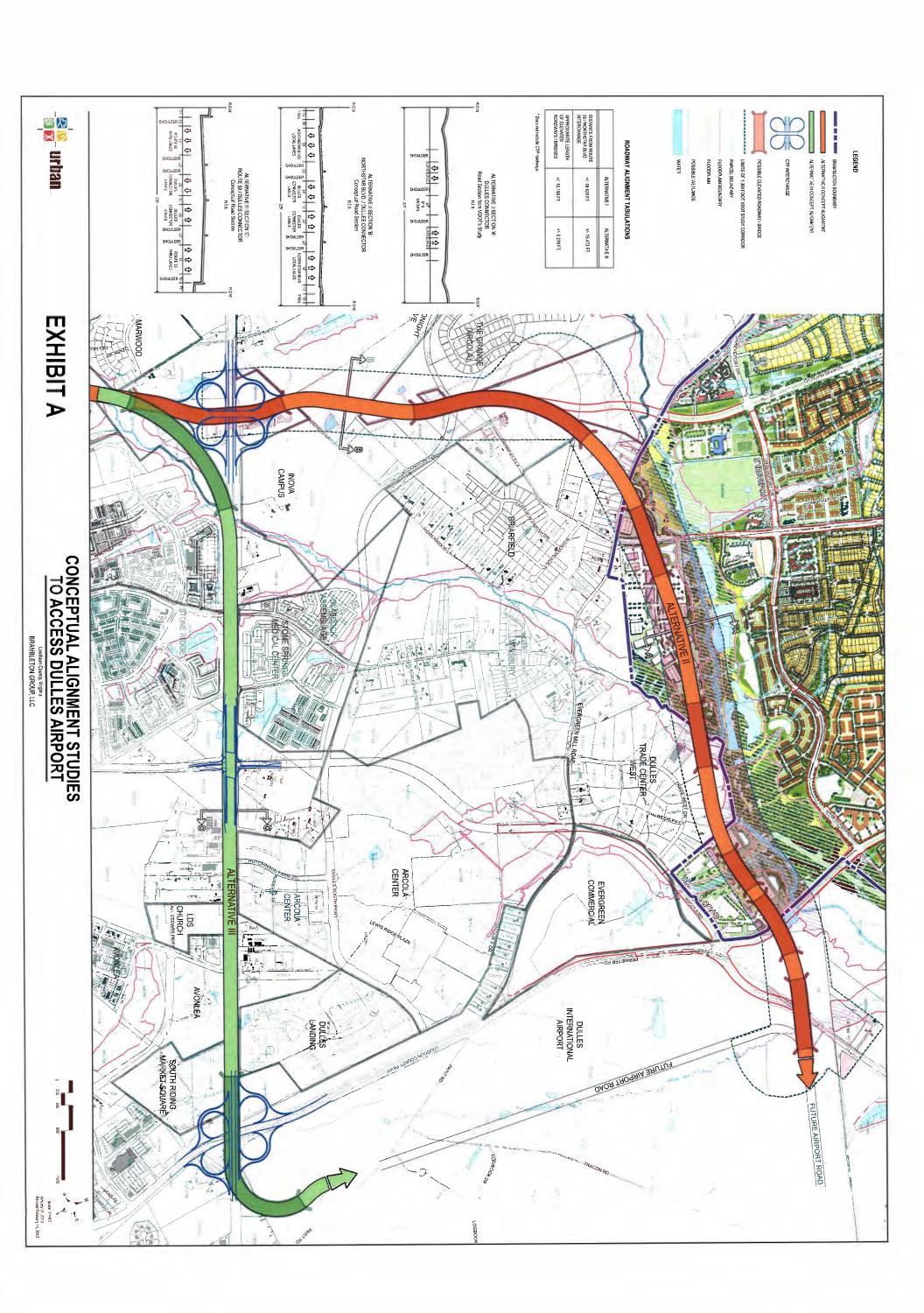
Exhibit A - Conceptual Alignment Studies

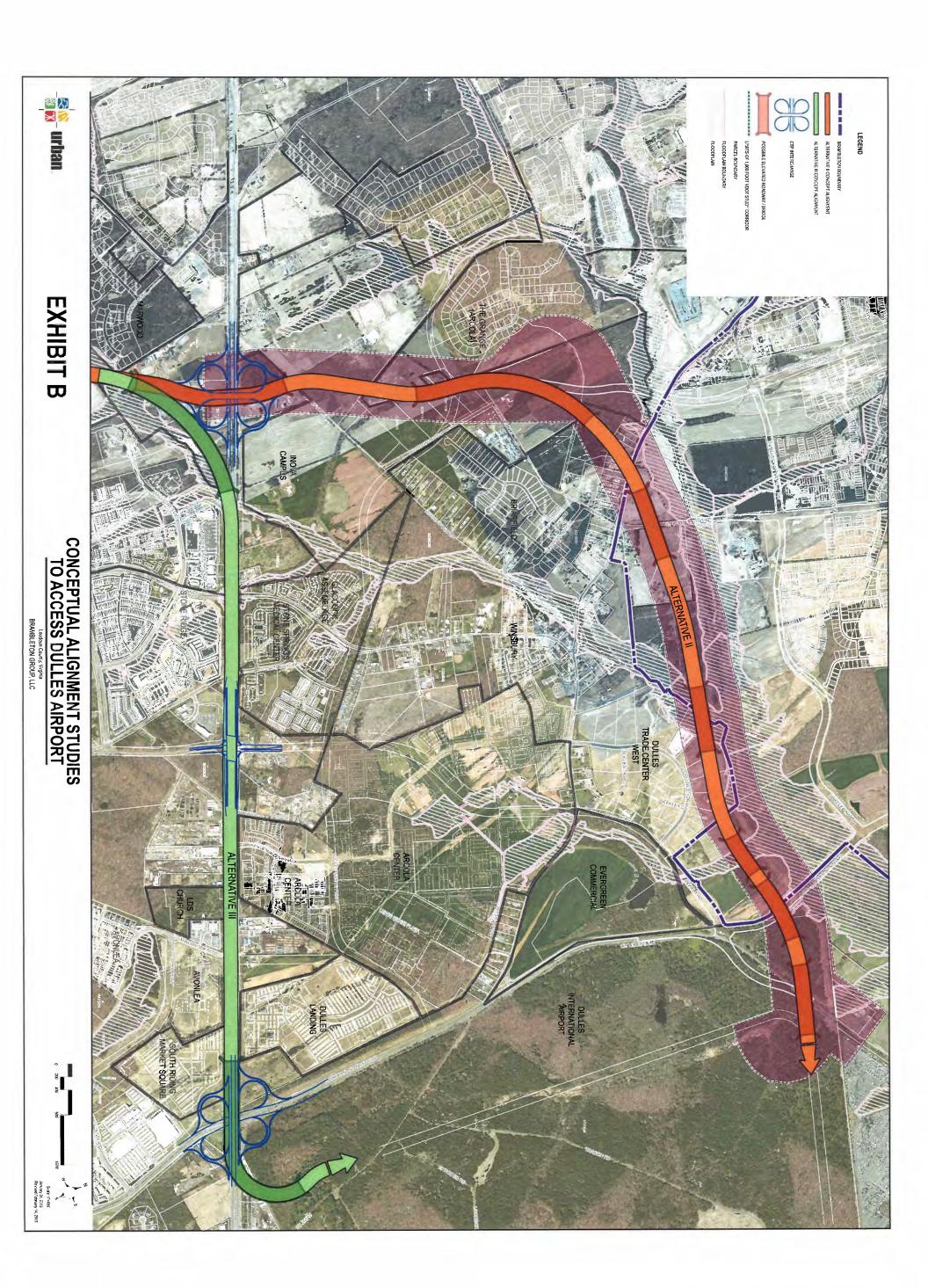
Exhibit B - Conceptual Alignment Studies - Aerial Background

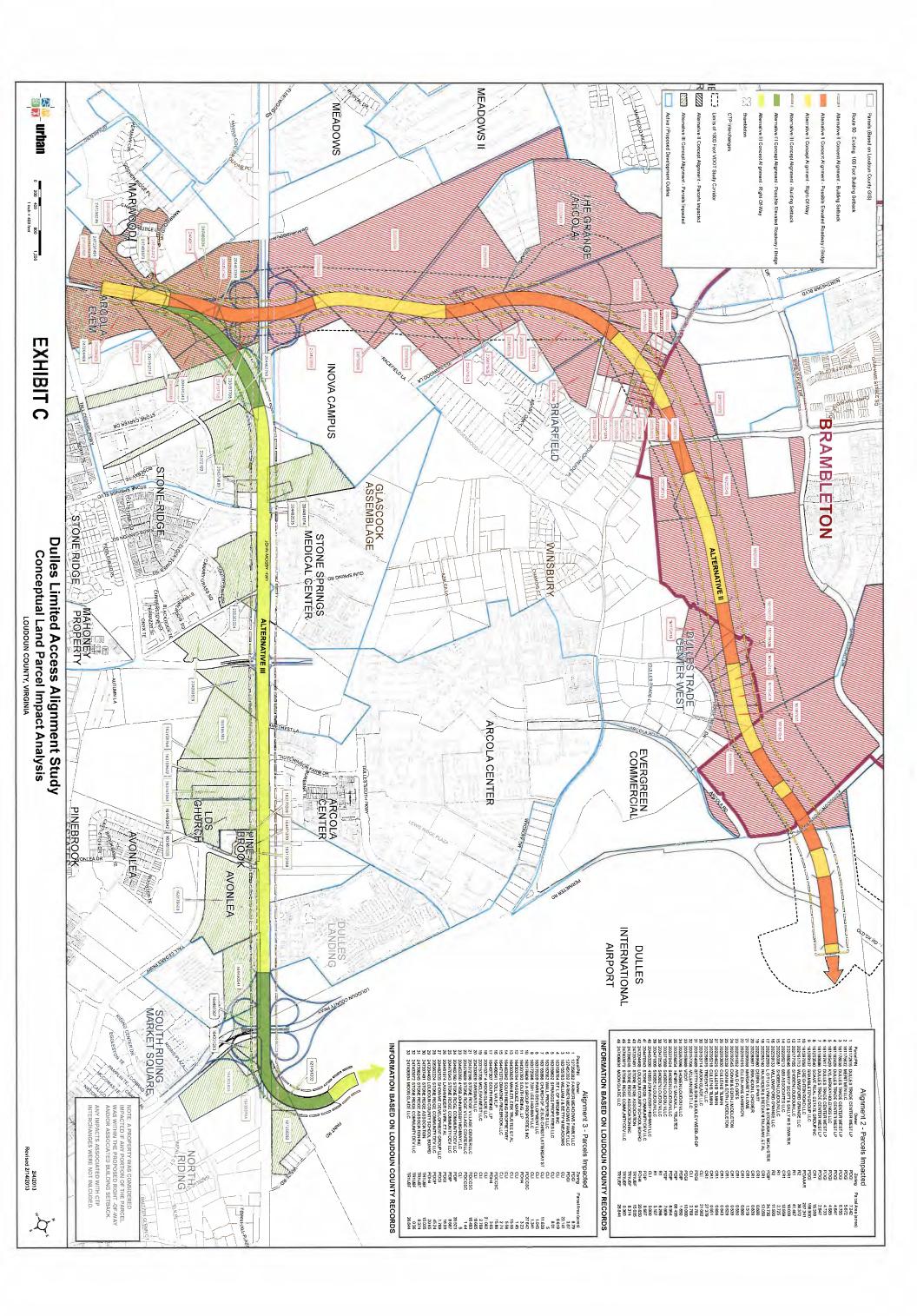
Exhibit C - Conceptual Land Parcel Impact Analysis

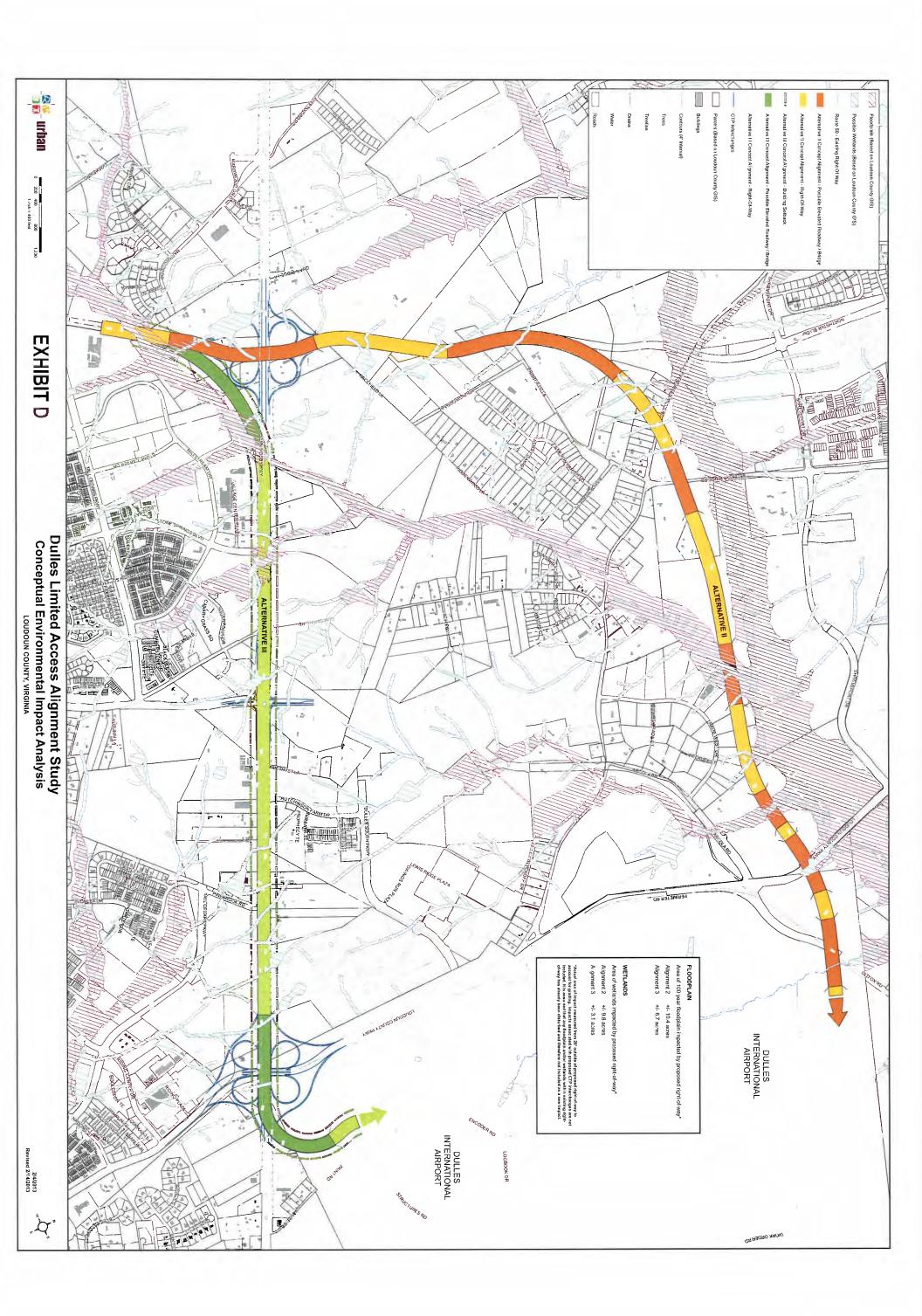
Exhibit D - Conceptual Environmental Impact Analysis

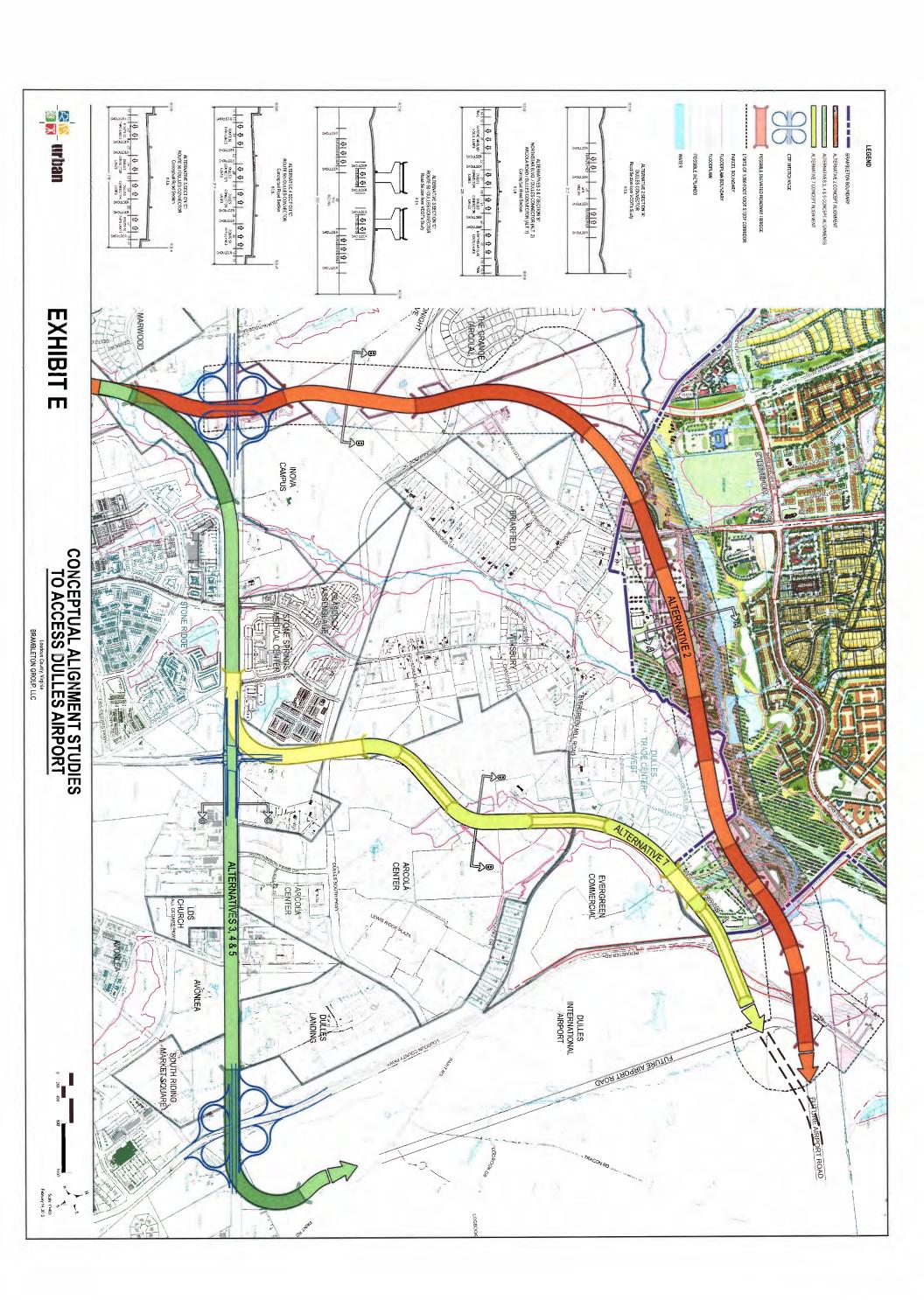
Exhibit E - Alternative Conceptual Alignment Studies











## The following comment opposing Alternative A of the "Improved Access to Dulles Airport" project was received via email from 392 individuals:

I urge the National Capital Region Transportation Planning Board to oppose Alternative "a" (aka Alternative #2) as shown in the CLRP Project Description #11: Improved Access to Dulles Airport.

My reasons for opposition are as follows:

- 1. VDOT claims that Alternative "a" (aka Alternative #2) will cost only \$153 million, an amount that is \$660 million less than the cost of Alternative "b" (aka Alternative #3). Yet VDOT has given no basis or details to support this enormous discrepancy including the lack of any update on their website. Neither cost estimate is valid in our opinion.
- 2. This road will create a negative impact on Loudoun County's future property tax revenue, as the economic development opportunity on commercial property will be deferred and ultimately could be lost forever.
- 3. This road will create a negative environmental and aesthetic impact.
- 4. This road will create a negative long-term transportation impact since it will not improve commuting patterns. It is time for VDOT to disclose the details behind its claims and to give the public an opportunity to provide informed and meaningful comment on a very important issue. No decision should be made until VDOT gives the taxpayers the information to which they are entitled.

Thank you for the opportunity to respond to the air quality conformity testing.

The following comment supporting Northern Virginia's transportation projects was received via email from 8 individuals:

I urge the National Capital Region Transportation Planning Board to support the Northern Virginia projects proposed for air quality conformity testing in the 2013 Constrained Long Range Plan and the 2013 to 2018 Transportation Improvement Program.

Of particular importance are new limited access passenger and freight connectors to Washington Dulles International Airport and the VA 28/Manassas Bypass Study.

Dulles Airport is a major regional economic engine and regional planners agree that much of the region's future growth will occur in outer Northern Virginia jurisdictions.

Please support these projects for air quality conformity testing.

# The following comment supporting Northern Virginia's transportation projects was received via postcard from 45 individuals:

I urge you and your colleagues to support air quality conformity testing for and inclusion of the Northern Virginia project submissions for the 2013 CLRP update and the FY 2013-2018 TIP.

Of particular importance is the proposed western passenger and freight limited access link north of Route 50 to Dulles Airport and the VA 28 Manassas bypass Study from Route 234 to I-66.

TPB studies document the importance of good airport access to regional prosperity and that much of the region's population and job growth will occur near Dulles and other areas served by CLRP and TIP submissions.