



NATIONAL CAPITAL REGION  

---

TRANSPORTATION PLANNING BOARD

Item 8

**MEMORANDUM**

April 16, 2014

To: Transportation Planning Board

From: Gerald K. Miller  
Acting Co-Director,  
Department of Transportation Planning

Re: Comments Received on Project Submissions for Inclusion in the Air Quality  
Conformity Analysis for the 2014 CLRP and FY 2015-2020 TIP

At the March 19, 2014 meeting, the Board was briefed on the project submissions for the draft 2014 CLRP and the FY 2015-2020 TIP, which were released for public comment and agency review at the TPB Citizens Advisory Committee meeting on March 13, 2014. This public comment period closed on April 12.

More than 400 comments were submitted by individuals and organizations over the course of the 30-day comment period. These comments are summarized here but can be reviewed individually on the TPB website at [www.mwcog.org/transportation/public/comments.asp](http://www.mwcog.org/transportation/public/comments.asp). The attached comments have been grouped into three broad categories:

- A. The 2014 CLRP Must Address Regional Climate Change Goals
- B. The MARC Growth and Investment Plan needs additional service improvements
- C. Virginia highway projects should be reevaluated

Attachments



## **A) The 2014 CLRP Must Address Regional Climate Change Goals**

A joint letter from the Coalition for Smarter Growth and 24 other organizations begins on the next page.

The following text pertaining to carbon emissions and climate change was received via email from 275 individuals:

As you review the 2014 Constrained Long Range Plan (CLRP), I urge you to commit to full disclosure of the forecasted climate change impact, and to take urgent action to align our transportation plan with the region's climate change goals.

I understand that recent analysis of the 2013 CLRP revealed that our currently planned projects, if built, would cause the region's transportation emissions to rise instead of drop to begin to meet the 80% reduction you have committed to. While fuel efficiency and fuel types are improving, there remains a large gap between transportation emissions forecasts and the region's climate goals. In order to get on track to meet our region's climate change goals, we must commit urgently to a dramatic increase in the region's share of trips taken by walking, cycling, and transit.

I urge you to conduct a transparent assessment of the CLRP and its performance with respect to climate change this year, to reevaluate all of the projects in the plan to ensure it achieves significant reductions in per capita vehicle miles traveled, and to reduce carbon emissions from transportation emissions.

Please don't wait for the federal government to make us act. Let's be leaders and tackle our transportation emissions now.

*1000 Friends of Maryland, Action Committee for Transit, Bike Maryland, Chesapeake Bay Foundation, Chesapeake Climate Action Network, Chesapeake Physicians for Social Responsibility, Clean Water Action, Communities for Transit, DC Environmental Network, Earthjustice, Environment America, Environment Maryland, Environment Virginia, Fairfax Advocates for Better Bicycling, Maryland Environmental Health Network, Montgomery County Sierra Club, Montgomery County Young Democrats, Natural Resources Defense Council, Piedmont Environmental Council, Sierra Club - Mount Vernon Group, Southern Environmental Law Center, Virginia Conservation Network, Washington Area Bicyclists Association*

April 11, 2014

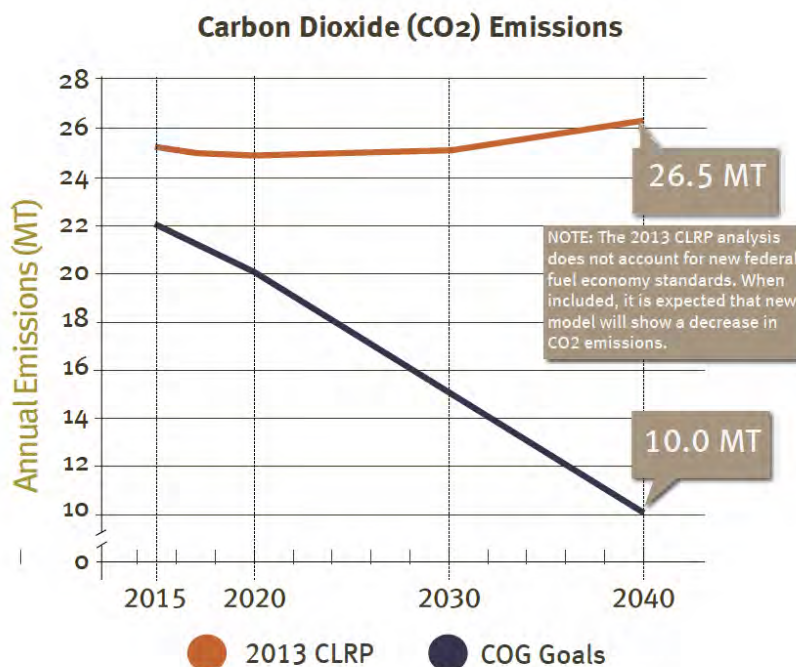
The Honorable Patrick Wojahn, Chair & Members of the Committee  
 National Capital Region Transportation Planning Board  
 c/o Metropolitan Washington Council of Governments  
 777 North Capital Street, NW, Suite 300  
 Washington, D.C. 20002

**The Constrained Long Range Plan update must address regional climate change goals**

Dear Chairman Wojahn and Members of the Transportation Planning Board:

The undersigned organizations call on the National Capital Transportation Planning Board (TPB) to commit to full disclosure of the forecasted climate change impact of the 2014 Constrained Long Range Plan (CLRP), and to take action to align the CLRP with the region’s climate change goals. One of the most important national and multi-national public policy issues of our time, climate change must be tackled by every city, county, region, state, and nation. Given that our region has already adopted important goals, it is past time to begin implementing them.

We have already exceeded the Earth’s safe limit for atmospheric CO2 concentration – 350 parts per million. Reducing CO2 emissions to 80% below 1990 levels by 2050 is the scientifically supported goal to begin to bring CO2 under control. In 2008, the Metropolitan Washington Council of Governments (MWCOC) committed to a more modest goal of an 80% reduction in total CO2 emissions below a 2005 baseline by 2050. *Region Forward*, endorsed by the COG Board and local jurisdictions in 2010, confirmed the goal of 80% cuts by 2050, and added a goal of 20% reductions by 2020 below 2005 levels.



We understand that analysis of the 2013 CLRP revealed that the current set of projects, if built, would cause the region's vehicle miles of travel and thus transportation emissions to rise instead of drop, making no progress toward the necessary 80% reduction in CO2 emissions (see figure above). We understand that the models used for this analysis may change, but the analysis makes clear we are a long way (some five millions tons by 2020 and more than 20 million tons by 2050) from meeting the goals MWCOG and member jurisdictions have set for making essential reductions in greenhouse gas emissions.

At the same time, we could be doing more to meet our existing air quality conformity requirements to ensure we are meeting human health needs. The conformity process in the Washington region uses outdated mobile emissions budgets that have little relationship to either the new ozone standards or the more stringent ones that are likely to be adopted in the near future. The current conformity process does not support emissions reductions from the transportation sector sufficient to bring the region into attainment "as expeditiously as practicable," as is required by the Clean Air Act [42 USC § 7511(a)].

With EPA moving to regulate CO2 from power plants under the Clean Air Act, it is important to note that the agency's path to national standards has been made easier by the many state and regional efforts to bring down power plant CO2 emissions. To build momentum for a similar effort aimed at reducing mobile source CO2 emissions through transportation investments, we call on TPB to lead, to use and implement its recently adopted reports and plans (e.g. 2010 *Region Forward* plan, the 2010 "[What Would it Take](#)" report, and the 2014 [Regional Transportation Priorities Plan](#)) and to set a national example by ensuring our long-range transportation plan effectively fights climate change.

While fuel efficiency and fuel types are improving, there remains a large gap between transportation emissions forecasts and the region's climate goals. The MWCOG 2010 *What Would It Take Scenario* relies heavily upon stricter federal CAFE standards, but acknowledges that even the major cuts that could be realized by fleet improvements will fail to get us where we need to be. In order to get on track to meet our region's climate change goals, we must commit urgently to a dramatic increase in the region's share of trips taken by walking, cycling, and transit.

It's not unrealistic for us to achieve bold goals. Already today, 50% of all trips in DC are by walking, bicycling and transit, and while adding 83,000 residents over the past decade, the city saw vehicle registrations decline. The [Sustainable DC plan](#) goal for 75% of all trips in the District to be by walking, cycling, or transit by 2032 is very achievable.

Meanwhile, tens of millions of square feet of development in Arlington's two Metro corridors have helped to shift a majority of trips in those corridors to walking, bicycling, and transit, while not increasing traffic on surrounding local roads. Across the region 84% of new office construction is within 1/4 mile of a Metrorail station, and suburban leaders are embracing transit-oriented development and proposing new transit lines. New development now occurring or proposed around Metro stations in Prince George's and Montgomery Counties, and at the new Tysons stations in Fairfax County, will allow economic growth to occur while encouraging transit to effectively serve reverse-commuters. Not only do these approaches to transportation and growth reduce climate change emissions when compared with "business-as-usual" scenarios, they offer an alternative to driving in congestion and have been shown to have health and economic benefits.

It is time that the CLRP funding and projects be directed to supporting these positive trends and MWCOG's own goals. Specifically, we call on the TPB to take the following actions to ensure that the CLRP is on track to achieving the region's climate change goals:

- This year's CLRP update should include a complete reevaluation of all projects, and be amended to meet climate goals and the goals of the *Region Forward* plan and *Regional Transportation Priority Plan*. We note that the modeling which COG/TPB performs today, albeit using outdated mobile air emissions budgets, nevertheless reveals CO2 emissions along with VOCs, NOx, and PM 2.5; these emissions should be displayed and evaluated just as the other pollutants are discussed.

- Absent this necessary action, the TPB should vote to require a transparent assessment this year of whether or not the CLRP, and specific projects within the CLRP, meet climate goals, while also voting to mandate a full reevaluation and any necessary amendment of the CLRP in 2015 to achieve MWCOG's climate and sustainability goals.
- The CLRP should achieve significant reductions in per capita vehicle miles traveled as called for in *Region Forward* and the *Regional Transportation Priorities Plan*; significant increases in mode shares for transit, walking, bicycling, carpooling, and telecommuting; and significantly improved accessibility such that the overwhelming majority of trips within activity centers are by walking, biking and transit.
- TPB should remove the transit constraint through funding of the necessary Momentum/Metro 2025 projects and inclusion of other necessary transit projects sufficient to show robust progress in reducing greenhouse gas emissions from transportation and to reduce VOCs, NOX and PM2.5 emissions. Shifting more funding to transit could also eliminate the alleged need for the margin of safety above future air quality standards the staff asked you to approve last year.
- Finally, we urge TPB to work with MWCOG's staff on their "Beyond Conformity" project to bring together the political leadership necessary to determine a path forward for aligning our transportation plans with our region's climate change goals, and to become a national leader in regulating mobile sector CO2 emissions.

Given the Washington region's and the Chesapeake Bay's vulnerability to climate change, it is essential that we act now. Thank you for your attention,

Sincerely,

Stewart Schwartz, Coalition for Smarter Growth

Deron Lovaas, Natural Resources Defense Council

Lee Epstein, Chesapeake Bay Foundation

Sierra Club - Mt. Vernon Group

Dru Schmidt-Perkins, 1000 Friends of Maryland

Nik Sushka, Montgomery County Young Democrats

Andy Fellows, Clean Water Action

Chelsea Harnish, Virginia Conservation Network

Shane Farthing, Washington Area Bicyclists Association

Chris Weiss, DC Environmental Network

Bruce Wright, Fairfax Advocates for Better Bicycling

Tim Whitehouse, Chesapeake Physicians for Social Responsibility

Rebecca Ruggles, Maryland Environmental Health Network

Carol Silldorff, Bike Maryland

David Hauck, Communities for Transit

Timothy Ballo, Earthjustice

Tina Slater, Action Committee for Transit

Trip Pollard, Southern Environmental Law Center

Dan Holmes, Piedmont Environmental Council

Mike Tidwell, Chesapeake Climate Action Network

Sarah Bucci, Environment Virginia

Environment America

Joanna Diamond, Environment Maryland

Ethan Goffman, Montgomery County Sierra Club

## **B) The MARC Growth and Investment Plan needs additional service improvements**

A letter received from Maryland Delegate Al Carr and 10 other co-signers, and a letter from the Action Committee for Transit follow on the next page.

A petition titled “Metropolitan Washington Council of Governments Transportation Planning Board: Fix the MARC Growth and Investment Plan” and containing the following text was signed by 120 individuals:

The demand for quality transit is growing locally and nationally. Commuter Rail services like MARC and VRE are enjoying ridership growth every year. The MARC Growth and Investment Plan of 2013 is in some ways worse than the 2007 version in that aspirational goals such as run-through service, all-day, two-way service and weekend service on the Brunswick and Camden lines were deleted. Rather than rubber stamp a weakened plan, the TPB needs to restore these aspirational goals. In your April meeting, fix the MARC Growth and Investment Plan by restoring holiday service and adding a vision for all-day, two-way and run-through service on the Brunswick and Camden Lines.





ALFRED C. CARR, JR.  
18th Legislative District  
Montgomery County

Environmental Matters  
Committee

*Subcommittees*

Land Use and Ethics

Motor Vehicles and Transportation



*Annapolis Office*  
The Maryland House of Delegates  
6 Bladen Street, Room 222  
Annapolis, Maryland 21401  
410-841-3638 • 301-858-3638  
800-492-7122 Ext. 3638  
Fax 410-841-3053 • 301-858-3053  
Alfred.Carr@house.state.md.us

*The Maryland House of Delegates*  
ANNAPOLIS, MARYLAND 21401

April 4, 2014

Mr. Robert L. Smith, Maryland Transit Administrator  
Maryland Transit Administration  
William Donald Schaefer Tower  
6 St. Paul Street, 2<sup>nd</sup> Floor  
Baltimore, MD 21202-1614

Dear Mr. Smith,

As legislators with the MARC riders in our districts, we are writing to request that MTA maintain key aspects for the MARC Growth and Investment Plan Update 2013 to 2050. These key aspects include the long-term vision for all-day, two-way service, weekend service and run-through service on the Brunswick and Camden Lines, as stated in the 2007 MARC Growth and Investment Plan.

In 2007, the Maryland Transit Administration (MTA) released the MARC Growth and Investment Plan, a document that envisioned the long-term improvement and expansion of the Penn, Brunswick and Camden Lines. The 2007 document included goals for the long-term expansion of the Brunswick and Camden Lines including all-day, two-way service and run-through service of trains beyond Union Station and on to L'Enfant Plaza and Virginia.

Unfortunately, in revising the MARC Growth and Investment Plan Update 2013 to 2050, long-term goals were removed such as all-day, two-way service, weekend service and run-through service on the Brunswick and Camden Lines. We are also concerned that the cuts to holiday service on the Brunswick and Camden Lines during the recession have not been reversed.

Efficient transportation is a priority in Maryland and MARC service serves as a critical link for our constituents. We believe there is great potential for commuter rail to improve access, mobility, economic development, and tourism within our region if we can agree on a long-term vision of expansion and improvement for the Brunswick and Camden Lines over the coming decades.

Mr. Robert L. Smith, Maryland Transit Administrator  
Maryland Transit Administration  
April 4, 2014  
Page 2

We are urging that these important aspects from the 2007 plan continue to be clearly included in the 2013 to 2050 plan update. Thank you for considering our request.

Sincerely,

Delegate Al Carr  
District 18

Delegate Kathy Afzali  
District 4

Delegate Shane Pendergrass  
District 13

Delegate Frank Turner  
District 13

Senator Karen Montgomery  
District 14

Delegate David Fraser-Hidalgo  
District 15

Delegate Aruna Miller  
District 15

Delegate Ana Sol Gutierrez  
District 18

Delegate Sam Arora  
District 19

Senator Jim Rosapepe  
District 21

Delegate Kirill Reznik  
District 39

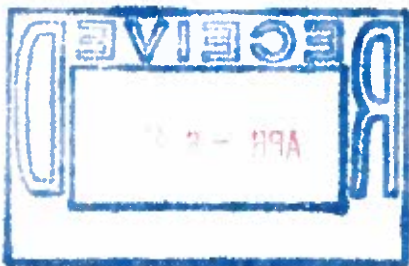
Delegate Shane Robinson  
District 39

CC: Jim Smith, Secretary of Transportation

James Knighton, Director, Office of External Affairs, Maryland Transit Administration

Diane Ratcliff, Director, Office of Planning, Maryland Transit Administration

Metropolitan Washington Council of Governments Transportation Planning Board



# Action Committee for Transit

---

[www.actfortransit.org](http://www.actfortransit.org)

P.O. Box 7074, Silver Spring, MD 20907

April 12, 2014

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

Dear Chair Wojahn and TPB Members:

Why is MTA's 2013 draft update of the MARC Growth and Investment Plan, so much less ambitious than its 2007 plan? The Transportation Planning Board should not rubber stamp this weakened plan.

Action Committee for Transit Board member, daily MARC rider, and member of the MARC Riders Advisory Committee, Miriam Schoenbaum, wrote an excellent piece on this topic for Greater Greater Washington in October 2013. I borrow heavily from her writing in my testimony below.

MARC is backing away from its 2007 proposal to move forward with a third track on the Brunswick line, a deficit that will hamper future TOD growth in several areas along this western line. The MARC Brunswick line is MARC's longest line, serving the TPB jurisdictions of Montgomery and Frederick Counties. The 2007 MARC Growth and Investment Plan proposed a third track from Georgetown Junction in Silver Spring, to Point of Rocks in Frederick County [a distance of approximately 40 miles]. It would have been built in three stages between now and 2035. In contrast, the 2013 draft update proposes only one small portion of third track in Montgomery County, and at unspecified locations elsewhere.

Why is this a problem? It is a problem because not having a third track reduces the chance that there will ever be all-day, two-way service. CSX owns the tracks that MARC trains use, and the agency will not allow MARC to run more service if there isn't a third track. If MARC doesn't say where they plan to put a third track, Montgomery County can't reserve the right-of-way for it, making it harder to build the third track later.

In Montgomery County, there are plans for MARC-related TOD at Kensington and White Flint, and construction is already underway at Gaithersburg, Germantown, and Metropolitan Grove. But will there be enough transit to support TOD at these stations, when MARC's **own** Growth and Expansion Plan does not call for eventual all-day, two-way service? Why is MTA's 2013 draft update so much less ambitious than its 2007 plan?

All of these projects should maintain a reserved right-of-way for the third track that will make it easier to provide all-day, two-way service on the Brunswick Line. And for this to happen, MTA's final update of the Growth and Investment Plan must restore both all-day, two-way service and a third track between Georgetown Junction and Point of Rocks as long-term plans. We ask the TPB to request that MTA restore these provisions.

Sincerely,



Tina Slater, Vice President  
Action Committee for Transit

### **C) Virginia highway projects should be reevaluated**

A letter received from the Coalition for Smarter Growth and 6 comments submitted via email or online pertaining to specific projects in Virginia follow this page.



April 12, 2014

The Honorable Patrick Wojahn  
National Capital Region Transportation Planning Board  
c/o Metropolitan Washington Council of Governments  
777 North Capital Street, NW, Suite 300  
Washington, D.C. 20002

Re: 2014 Update to the Constrained Long Range Plan

Dear Chairman Wojahn and Members of the Transportation Planning Board:

Please accept the following comments on the draft 2014 update to the Constrained Long Range Plan (CLRP). The Coalition for Smarter Growth (CSG) urges the Transportation Planning Board (TPB) to fundamentally reevaluate the entire Constrained Long Range Plan this year in order to meet the Council of Governments' (COG) own goals, including addressing climate change and meeting ever-stricter air quality standards for human health. This reevaluation should include the ability to remove projects which do not support your goals, including allowing for shifting funds to transit and the internal connectivity needs of the mixed-use, walkable and transit-oriented activity centers to which you have committed. In one particular example, the Momentum Metro 2025 program should be fully funded to meet growing demand, support the addition of new transit networks, to remove the transit constraint imposed in the modeling and to help meet your climate and air quality goals.

In a joint letter commenting on this CLRP update and signed by 23 conservation, smart growth and transportation groups (which CSG incorporates by reference in this letter) we urged the TPB to act quickly to reduce CO2 emissions from transportation to help meet COG's climate goals and to reduce ozone precursors from transportation in order to bring the region into attainment "as expeditiously as practicable," as is required by the Clean Air Act [42 USC § 7511(a)].

COG and the TPB have completed extensive planning over the past few years to set goals that will ensure our region grows in a sustainable, equitable, efficient and economically competitive manner. Your guiding goals are incorporated in the Region Forward Compact and associated Activity Centers and Place + Opportunity reports, in the Climate Report, and in the Regional Transportation Priorities Plan, and in discussions at TPB meetings in the second half of 2013, the TPB indicated that the CLRP should address the goals set forth in these reports. Moreover, in the resolution adopting the RTPP, the TPB agreed "that local, state, and regional agencies should consider [the RTPP] when developing projects that are incorporated in the CLRP."

**The CLRP has never been fundamentally reevaluated in accordance with your goals, but this year**

**should be different. We urge you to fundamentally reevaluate the CLRP this year, including removing projects which do not meet the goals you have set.**

**2014 CLRP Amendments:**

We have specific concerns about the following projects proposed for addition this year:

**1) Dulles Air Cargo, Passenger, Metro Access Highway Alternatives -- Recommend reject**

A recent study by the George Mason University Center for Regional Analysis documented that the airport is unlikely to see significant cargo growth, even with major highway expansion, because of important market and structural factors in the air cargo industry. This project is designed to work in conjunction with the proposed Bi-County Parkway as part of an Outer Beltway complex that would include proposed Potomac River Bridges. This collection of projects would increase unsustainable land use and vehicle miles traveled, waste scarce resources and undermine your commitment to transit-oriented development. In lieu of this project, some upgrades to Route 50 including a peak hour dedicated express bus lane, and Route 606 (to six lanes), along with an improved local network should be the priority.

**2) Widen VA Route 123 from VA 7, Leesburg Pike to I-495, Capital Beltway -- Recommend reject**

Widening Route 123 to 8 lanes is antithetical to Fairfax County's goal to make Tysons a walkable, transit-oriented center. It will undermine use of transit, draw more driving into Tysons and inhibit pedestrian and bicycle circulation. Dedicated lanes for transit and for cycle tracks should be the priority.

**3) Widen US 1 from Fuller Road to Russell Road from 4 to 6 lanes -- Recommend defer decision**

We are concerned about the continued focus on widening Route 1, rather than on adding transit, expanding VRE capacity, and creating mixed-use, walkable centers along the corridor. Additional widening for vehicle lanes should be deferred pending completion of the Route 1 transit study.

**4) MARC Growth and Investment Plan and VRE System Plan -- Recommend evaluation in context of intercity Amtrak service needs**

We have heard a number of experts recommend better coordination between our commuter rail services and our intercity Amtrak service in planning for future service allocations. We need to ensure that adequate capacity is retained to allow for good intercity service, and that commuter rail capacity expansion is focused on moving more people from and to existing stations, and less on further radial extensions of commuter rail.

**Existing CLRP:**

**1) Bi-County Parkway, Tri-County Parkway and Manassas Battlefield Bypass -- Urge removal**

A coalition of conservation and smart growth groups have offered an effective alternative to these proposed projects -- an alternative focused on investment in I-66 and Route 28, in local road networks and in better commuter transit services. We summarize our concerns about the Bi-County Parkway and the North-South Corridor in Enclosure A to this letter, but they include the impact on air quality, climate

change and the Chesapeake Bay. We continue to urge removal of these projects from the CLRP.

**2) Significant number of highway expansion projects and interchanges in the existing CLRP -- Urge reevaluation**

The CLRP highway map (<http://www.mwcog.org/clrp/projects/highway.asp>) illustrates an extensive set of highway expansions which will fuel additional long-distance commuting, air pollution, and CO2 emissions. Given limited transportation funds, they also divert funds needed for an improved transit network and for supporting your goals for walkable, transit-oriented activity centers. Therefore, a full reevaluation of the CLRP is essential. Even for the outer suburbs, investment in new express transit service for commuters and better local road networks tied to mixed-use development, would offer more lasting benefits than would such extensive highway expansion.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Stewart Schwartz". The signature is fluid and cursive, with a long horizontal stroke at the end.

Stewart Schwartz  
Executive Director



## Enclosure A:

### The Case for Removing the Bi-County Parkway from the CLRP and Rejecting the Project

**Water quality and the Chesapeake Bay:** Building the Bi-County Parkway would trigger a new speculative real estate development push in Loudoun, Prince William, Fauquier and Stafford Counties. This conversion of rural land to scattered subdivisions, roads, and strip commercial development would make it nearly impossible for Virginia to achieve improvements in local water quality or make gains restoring the Chesapeake Bay.

In the immediate area of the proposed highway, there are 50,000-100,000 acres of rural and relatively undeveloped land, most of which is the headwaters for the Bull Run watershed, a major source of the Occoquan Reservoir. The Occoquan is a key component of the regional water supply for Northern Virginia; every effort has to be made to maintain and improve water quality in the Bull Run watershed through rural land protection to minimize impervious surface. Unfortunately, neither VDOT nor the National Park Service has adequately analyzed the impact of the proposed Bi-County Parkway in accelerating and increasing the level of development in the watershed.

**Air Quality and Climate Impact:** According to VDOT's own analysis, the Bi-County Parkway would increase vehicle miles traveled and traffic congestion within the study area compared to not building the highway at all. Therefore the project would undermine the progress the Northern Virginia region has made over the past decade in reversing the trend of ever increasing trips per capita and length of trips. Whether we use traditional internal combustion vehicles, hybrids or electric cars, increased driving adds to traffic and increases net energy consumption and associated greenhouse gas emissions.

At a more local level, the highway would pass close to two newly constructed schools, subjecting the students to air and noise pollution, and foreclosing the opportunity for the children to walk and bicycle to school. Recent EPA studies have shown that children experience significant harm from the hot-spot air pollution generated by nearby highways.

**Degradation of Historically Significant Land** -- The highway would take 68 acres of historic battlefield land -- the site of the Second Battle of Manassas, and lead to development of hundreds of acres throughout the western portion of the historic district. The traffic, noise and visual impact would forever degrade this historic landscape and discourage historic tourism.

**Misspent Funds, Better Projects Lose Out** -- VDOT recently estimated that the Bi-County Parkway would cost \$444 million (or an astonishing \$44 million per mile), and the combined North-South Corridor would cost between \$1 billion and \$1.5 billion. This is simply an unacceptable amount of scarce funding to divert from critical needs, such as fixing I-66. Regarding congestion around Dulles Airport, the proposed Bi-County Parkway -- which travels a few miles west of Dulles Airport and far from the passenger entrance on the east side -- would do little to address it. In fact, when outside transportation experts analyzed the current proposal, they found the highway would actually increase overall congestion in the study area. Further,

- VDOT's traffic numbers show the Bi-County Parkway would barely reduce traffic on Route 28, the key north-south artery to the airport passenger entrance.

- By generating residential development in rural areas west of the airport, it would increase traffic on major east-west commuting routes like Route 50.

**Alternatives Exist** -- Several of our organizations have worked together to highlight an effective set of solutions for traffic in the highway study area and for access to Dulles Airport. These include:

- Fixing and expanding the Route 28/I-66 interchange. The project currently is only partially funded.
- Replacing the traffic light on Route 28 at Braddock Road with an interchange. This is the last Route 28 intersection requiring this conversion, but the project isn't currently funded.
- Fixing Route 50 and Route 7, using interchanges where needed and providing nearby parallel roads for local traffic (e.g. Tall Cedars Parkway parallel to Route 50 and Riverside Parkway parallel to Route 7). Providing nearby parallel roads to Route 28 in Fairfax and Loudoun (e.g. Pacific Boulevard).
- Expanding the two lane section of Route 606 to four lanes. This was recently funded.
- Finishing rail to Dulles (the Silver Line). The state is not contributing adequate funds, placing most of the burden on toll payers and landowners for Phase 2.

To the TPB,

These comments pertain to VP 10T, a proposed project to widen Route 123 within the Tysons core from the Capital Beltway to Route 7.

For air quality, traffic mitigation and safety reasons, please do not allow this project to proceed.

The proposed widening of Route 123 was originally conceived when the Silver Line was still a concept and now must be re-evaluated according to current and future conditions and considering the needs of all travelers, including those who move by transit, walking or bicycling. History has shown that road widening in urban areas encourages motorized vehicle use and thereby decreases air quality, as a further widening of Route 123 certainly would for the Tysons area and the Capital region in general. Consider where New York City would be if road widening had been the only policy for reducing traffic congestion.

Road widening not only adds to single-occupancy vehicle use and emissions, it also reduces the ability to safely walk, bicycle and access transit. As it is now, the road is extremely difficult for pedestrians and cyclists to cross or parallel safely.

To truly adhere to TPB's regional goals for air quality and multi-modal safety, Route 123 should not be widened but instead re-purposed to make space for dedicated transit and bicycle lanes. Looking toward the near future, dedicated transit lanes will become even more important for the efficient and clean movement of people within Tysons as connected and/or autonomous transit systems are developed.

Sincerely,

Jenifer Joy Madden

Hunter Mill District representative, Fairfax County Transportation Advisory Commission

---

The purpose of this message is to voice my opposition to VP 10T, a proposed project that would widen Route 123 within the Tysons core from the Capital Beltway to Route 7. The reasons for my opposition include not only the fact that air quality and human environment would suffer, but also due to the fact that such a project would negate the advantages brought by the Silver Line metro and make Tysons Corner less walkable.

The proposed widening of Route 123 was originally conceived when the Silver Line was still a concept and now must be re-evaluated according to current and future conditions and considering the needs of all travelers, including those who move by transit, walking or bicycling. History has shown that road widening in urban areas encourages motorized vehicle use and thereby decreases air quality, as a further widening of Route 123 certainly would for the Tysons area and the Capital region in general. Consider where New York City would be if road widening had been the only policy for reducing traffic congestion.

Road widening not only adds to single-occupancy vehicle use and emissions, it also reduces the ability to safely walk, bicycle and access transit. As it is now, the road is extremely difficult for pedestrians and cyclists to cross or parallel safely.

To truly adhere to TPB's regional goals for air quality and multi-modal safety, Route 123 should not be widened but instead re-purposed to make space for dedicated transit and bicycle lanes. Looking toward the near future, dedicated transit lanes will become even more important for the efficient and clean movement of people within Tysons as connected and/or autonomous transit systems are developed.

Sincerely,

Dragan Momcilovic  
Vienna - Tysons Corner, VA

---

The problem isn't, and has never been, that Route 123 within Tysons doesn't have enough lanes. A supposed expert touting this stretch of quasi highway as being a congestion point is exercising the highest form of non-local negligence. In other words, I don't think who ever proposed this project has ever even been to Tysons.

Why do I think that? The only back ups that ever occur within town happen due to back ups (caused by accidents) on the 495 on-ramps and the bottlenecks that happen on exit from the town at McLean and Vienna.

In the case of McLean, the bottle neck is now permanent due to column locations of the Silver Line. In the case of Vienna, the town has no plans on allowing any widening of Maple Avenue as this is a corridor of significant retail and community importance, and they certainly don't want the road design standards that VDOT has in store for them.

This plan to widen from 6 lanes to 8 lanes is throwing away crucial funds, \$22 million to be exact, so that people will think VDOT has made an improvement, but there will be zero congestion relief.

By mimicking the design of Route 123 between 495 and the Dulles Toll Road (DTR) VDOT intends to create more situations where people routinely speed at 55 mph only to slam on their brakes. I routinely watch vehicles come off of the beltway on ramps and speed at 55 mph, and here is the secret, it's not their fault. The language of the road that VDOT has created by making Route 123 a quasi highway is that it is similar to Route 28, which does have a 55 mph speed limit. So people believe they are correct, or at least zone out from paying attention.

This has lethal implications to anyone who is cycling or simply crossing the street at any of the Route 123 intersections, and no amount of speed limit signs will change that situation.

The plan is exactly what has turned Tysons into the wasteland of office parks that many consider it, and assures more of the same if not objected to by officials who intend to turn the area into a more walkable neighborhood. In fact, it is a double whammy because the funds being wasted on this project won't even go to fix any traffic problems, it is widening for the sake of widening.

Officials will point to the need to incorporate bike lanes and bus lanes as a guise as to why the project is necessary, but the empirical evidence that has been seen from the widening of Route 123 on the east end of town shows that widening does not need to occur in order for that to be feasible. Instead the widening to 8 lanes has all but removed any ability to safely travel Route 123 in anything but a car.

Tyson's terminates at both ends with a 4-lane road that is, for all intents and purposes, a permanent condition. Any road width wider than that section is fruitless and actually creates more traffic by creating bottleneck merging, which is already the case with the 6 lane road (8 lanes on the east end of town).

Instead of this wasteful spending, the county and VDOT could spend thousands (not millions) of dollars to repaint the far right lanes of the already 6 lane road as shared bus/bike lanes. Because the real issue is the bottleneck, and this would effectively retain a consistent lane section through Old Courthouse Road, it would not cause any additional traffic friction. What it would provide is bus rapid transit and non-vehicle access from the heavily populated neighborhoods of Vienna (and the W&OD trail) to Tyson's.

The businesses and stores along Route 123, and those that the county desperately wants to occur, would see an added benefit of not having to be stuck next to a quasi highway, which makes the land around it look more like industrial use than commercial, and therefore less marketable.

People are starting to see that VDOT has a road fat crisis, proposing waste project after waste project instead of reviewing what the root causes of the congestion is. This comes both from a fundamental lack of understanding in how to design urban regions, but also from lazy design which doesn't even travel to the location to see what's causing the problem in the first place.

If this project goes through, just call it another move towards the old terrible status quo, a far cry from the ambitions to turn Tyson's into a community. How many crosswalks, street lights, stop lights, and bike lanes could be created instead with this money?

navid@thetysonscorner.com

---

Re: VP 10T, which would widen Route 123 within the Tyson's core from the Capital Beltway to Route 7.

The proposal to widen Route 123 is, well, fairly preposterous. Very few road widening projects ever actually improve traffic, let alone the "experience of place." Widening Route 123 will NOT improve traffic flow or alleviate congestion. Take a quick read of Anthony Down's "Triple Convergence" and it is clear that increasing road capacity just worsens congestion because all the more cars now travel on the new road. "Hey, there are more lanes. Let's go use them!" Thus, new lanes = instant road at capacity.

Isn't the whole idea of Tyson's to create an actual place where people live and not just work? Who wants to live someplace (or choose to move to a place) where it is nearly impossible to cross the road? Increasing the number of lanes will make crossing an already cavernous Route 123 more like crossing the Red Sea...a truly epic (and frightening) undertaking.

We've just spent a mere billion bucks on a state-of-the-art metro rail expansion. And now VDOT wants to add more car lanes to Route 123? Could any action be more contrary to increasing mode-share, improving air quality, increasing bike and transit use?

Don't widen Route 123. Make better use of transportation money (and master planning) and focus on expanding the panoply of transportation options such as transit, biking, and ride-share.

Thank you.

Anne Marie McKinnon  
Vienna, VA 22182

---

Item 10\_ Widen Rt 123 from 6-8 Lanes. Rt 123 has always functioned as a through road from Fairfax to Washington, DC. Widening here should be discouraged. Will not help air quality because it encourages higher speeds, more thru put and more exhaust. Still must solve the problem of an 8 lane road emptying into a restricted 4 lane road beyond Lewinsville Road inbound. Cannot assume Tysons is the destination. It is difficult to envision street level retail in this area. While some foot traffic to the Metro Stations will be above street level, those trying to cross Rt 123 at grade will find 8 lanes overwhelming.

#11 Dulles Air Cargo Passenger Metro Access Highway Alternatives. Why is Alt 2, a new road, needed when scarce toll road and state monies are being/have been used to widen Rt 50, Rt 128, and Rt 606 <http://www.washingtonairports.com/assets/documents/Dulles%20Loop%20Implementation%20Plan%20Report051509%20copy.pdf>. The Dulles Loop plan was approved to improve access around the airport. Implementation of the plan, esp widening Rt 606 eventually to 8 lanes functionally increases access for air cargo to and from the western side of the airport. How does building still more road capacity improve air quality?

Thank you.

Merrily Pierce  
McLean, VA 22101

---

I notice that most of Virginia's projects deal with road widenings. I am a little surprised that professional transportation planners in this era would advocate for old-school solutions that have been proven repeatedly to induce demand. My challenge to VDOT officials is to publicly provide 3 examples of major road widenings in the Metro Washington region that did not return to their original, pre-widening, level of service within 5 years of project completion. If they can manage this feat, I will accept their recommendations as thoughtful answers to regional congestion issues, rather than knee-jerk reactions to existing conditions.

Thanks

Kevin Posey  
Alexandria, VA 22301