

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 15, 2012

To: Transportation Planning Board

From: Ronald F. Kirby
Director, Department of
Transportation Planning

Re: Technical Corrections to the Project Submissions for the 2012 CLRP and FY 2013-2018 TIP, and Comments Received and Recommended Responses

The attached materials include technical corrections to the projects submitted for inclusion in the Air Quality Conformity Analysis of the 2012 Financially Constrained Long-Range Transportation Plan (CLRP) and the FY 2013-2018 Transportation Improvement Program (TIP), provided by the Virginia Department of Transportation, as well as a summary of the public comments received on those project submissions and the recommended responses from the TPB.

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

MEMORANDUM

February 14, 2012

To: Transportation Planning Board

From: Ronald F. Kirby
Director, Department of
Transportation Planning

Re: Technical Corrections to the Project Submissions for Inclusion in the Air Quality Conformity Assessment for the 2012 CLRP and FY 2013-2018 TIP

The Virginia Department of Transportation (VDOT) has requested several technical corrections to the project submissions for the 2012 Financially Constrained Long-Range Transportation Plan (CLRP) and the FY 2013-2018 Transportation Improvement Program (TIP), prior to their inclusion in the Air Quality Conformity Assessment. The technical corrections pertain to two projects:

I-495 HOT Lanes Project

- The completion date of the northernmost segment of the I-495 HOT Lanes project (between the American Legion Bridge and south of the George Washington Parkway) had been proposed to move ahead from 2030 to 2013. VDOT has advised the TPB that the completion date for this segment should remain at 2030.
- VDOT is proposing to adjust the completion date of the next segment of the I-495 HOT Lanes (between south of the George Washington Parkway and south of Old Dominion Drive) from 2013 to 2015.

I-495 Auxiliary Lanes Project

- The completion date of ten segments of the I-495 Auxiliary Lanes project had been proposed to advance from 2030 to 2013. VDOT has advised the TPB that the completion date for all ten of these segments should remain at 2030.

Please see the attached table for a complete listing of all technical corrections submitted by VDOT. This table includes all conformity inputs for the I-495 HOV Lanes and Auxiliary Lanes projects.

2012 CLR P AIR QUALITY CONFORMITY INPUTS - DRAFT (Highway and HOV)

No.	Project ID	Improv.	Facility	From	To	Facility from	Lanes		Under Const. or ROW acquired?	Complt. Date or Status	
							to	from to			
43	V14aux	Widen	I-495 NB Auxiliary Lane	North of Hemming Ave. Underpass	Off Ramp to Braddock Rd	1	1	4+2	5+2	Yes	2030 2013 2030
44	V14aux	Widen	I-495 SB Auxiliary Lane	On Ramp from Braddock Rd	North of Hemming Ave. Underpass	1	1	4+2	5+2	Yes	2030 2013 2030
45	V14aux	Widen	I-495 NB Auxiliary Lane	On Ramp from Braddock Rd	Off Ramp to Rte 236	1	1	4+2	5+2	Yes	2030 2013 2030
46	V14aux	Widen	I-495 SB Auxiliary Lane	On Ramp from Rte 236	Off Ramp to Braddock Rd	1	1	4+2	5+2	Yes	2013
47	V14aux	Widen	I-495 NB Auxiliary Lane	On Ramp from Rte 236	Off Ramp to Gallows Road	1	1	4+2	5+2	Yes	2030 2013 2030
48	V14aux	Widen	I-495 SB Auxiliary Lane	On Ramp from Gallows Road	Off Ramp to Rte 236	1	1	4+2	5+2	Yes	2030 2013 2030
49	V14aux	Widen	I-495 NB Auxiliary Lane	On Ramp from Gallows Road	Off Ramp to Route 50	1	1	4+2	6+2	Yes	2013
50	V14aux	Widen	I-495 SB Auxiliary Lane	On Ramp from Route 50	Off Ramp to Gallows Road	1	1	4+2	5+2	Yes	2013
51	V14aux	Widen	I-495 NB Auxiliary Lane	On Ramp from Route 50	Off Ramp to I-66	1	1	4+2	5+2	Yes	2013
52	V14aux	Widen	I-495 SB Auxiliary Lane	On Ramp from Route 50	Off Ramp to I-66	1	1	5+2	6+2	Yes	2030 2013 2030
53	V14aux	Widen	I-495 NB Auxiliary Lane	On Ramp from I-66	Off Ramp to Route 50	1	1	4+2	5+2	Yes	2013
54	V14aux	Widen	I-495 NB	On ramp from EB I 66	Off Ramp to Rte 7	1	1	4+2	5+2	Yes	2013
55	V14aux	Widen	I-495 SB Auxiliary Lane	On ramp from Rte 7	Off Ramp to WB I 66	1	1	4+2	5+2	Yes	2030 2013 2030
56	V14aux	Widen	I-495 NB Auxiliary Lane	On ramp from Rte 7	Off Ramp to Rte 123	1	1	4+2	5+2	Yes	2013
57	V14aux	Widen	I-495 SB Auxiliary Lane	On ramp from Rte 123	Off Ramp to Route 7	1	1	4+2	5+2	Yes	2013
58	V14aux	Widen	I-495 SB Auxiliary Lane	On Ramp from Rte 123	Off Ramp to Route 7	1	1	5+2	6+2	Yes	2030 2013 2030
59	V14aux	Widen	I-495 NB Auxiliary Lane	On Ramp from Rte 123	Off Ramp to Rte 267	1	1	4+2	5+3	Yes	2013
60	V14aux	Widen	I-495 SB Auxiliary Lane	On Ramp from Route 267	Off Ramp to Route 123	1	1	4+2	5+4	Yes	2013
61	V14aux	Widen	I-495 NB Auxiliary Lane	On Ramp from Route 267	Off Ramp to Route 193	1	1	4+2	5+2	Yes	2030 2013 2030
62	V14aux	Widen	I-495 SB Auxiliary Lane	On Ramp from Route 193	Off Ramp to Route 267	1	1	4+2	5+2	Yes	2030 2013 2030
63	V14k	Construct	I-495 HOT	American Legion Bridge	S. of George Washington Pkwy.	1	1	8	8+2	Yes	2030 2013 2030
64	V14ka	Construct	I-495 HOT Lanes	S. of George Washington Pkwy	S. of Old Dominion Dr.	1	1	8	8+2	No	2015 2013
65	V14HOT	Construct	I-495 HOT	S. of Old Dominion Dr.	Hemming Ave. Underpass	1	1	8	8+4	Yes	2013
66	V14lb	Construct	I-495 NB Auxiliary Lane	1 mi. east of I-95/I-395/I-495	North of Hemming Ave. Underpass	1	1	8	5+1	Yes	2013
67	V14lb	Construct	I-495 SB Auxiliary Lane	Hemming Ave. Underpass	1 mi. east of I-95/I-395/I-495	1	1	8	5+1	Yes	2013
68	part of V14IHOT	Construct	I-495 HOT Lanes Interchange	Provides SB to WB, EB to SB, & NB to WB HOV movements	@ VA 267 (Dulles Toll Road)	1	1	-	-	Yes	2013
69	part of V14IHOTa	Construct	I-495 HOT Lanes Interchange	Provide SB HOT to EB HOV & EB DTR to NB HOT movements	@ VA 267 (Dulles Toll Road)	1	1	-	-	Yes	2013 2030
70	part of V14IHOTa	Relocate / Reconstruct	I-495 HOT Lanes Interchange	Move ramps from left side to right side: NB GP lanes to WB DTR; SB GP lanes to EB DTR	@ VA 267 (Dulles Toll Road)	1	1	1	1	Yes	2013 2030

2012 CLR P AIR QUALITY CONFORMITY INPUTS - DRAFT (Highway and HOV)

No.	Project ID	Improv.	Facility	From	To	Facility		Lanes		Under Const. or ROW acquired?	Complt. Date or Status
						from	to	from	to		
71		Construct	I-495 Interchange Ramp	SB I-495	WB Dulles Airport Access Highway (DAAH)	0	1	0	1	Yes	2013 2020
72		Construct	I-495 Interchange Ramp	EB Dulles Airport Access Highway (DAAH)	NB I-495	0	1	0	1	Yes	2013
73		Construct	I-495 Interchange Ramp	EB Dulles Airport Access Highway (DAAH)	SB I-495	0	1	0	1	Yes	2013
74	part of VI4IHOT	Construct	I-495 HOT Lanes Interchange	NB to WB, SB to WB, EB to NB, and EB to SB	@ Jones Branch Connector	1	1	-	-	Yes	2013
75	part of VI4IHOT	Construct	I-495 HOT Lanes Interchange	NB to WB, SB to WB, EB to NB, and EB to SB	@ West Park Connector	1	1	-	-	Yes	2013
76	part of VI4IHOT	Construct	I-495 HOT Lanes Interchange	NB to EB, NB to WB, EB to SB, and WB to SB	@ VA 7	1	1	-	-	Yes	2013
77	part of VI4IHOT	Construct	I-495 HOT Lanes Interchange	Provides SB to WB, WB to SB, EB to SB, NB to WB, WB to NB, & EB to NB movements	@ I-66	1	1	-	-	Yes	2013
78	VI4IHOT	Construct	I-495 HOT Lanes Interchange	NB to EB	@ I-66	1	1	-	-	Yes	2013
79	VI4IHOT	Relocate	I-495 HOT Lanes Interchange	@ I-66	I 495 to WB I 66 relocated to	1	1	1	2	Yes	2013
80	part of VI4IHOT	Construct	I-495 HOT Lanes Interchange	NB to EB, NB to WB, EB to SB, and WB to SB	@ US 29	1	1	-	-	Yes	2013
81	part of VI4IHOT	Construct	I-495 HOT Lanes Interchange	EB to NB, WB to NB, SB to EB, and SB to WB	@ VA 650 (Gallows Road)	1	1	0	1	Yes	2013
82	part of VI4IHOT	Construct	I-495 HOT Lanes Interchange	EB to NB, WB to NB, SB to EB, and SB to WB	@ VA 620 (Braddock Road)	1	1	-	-	Yes	2013
83	part of VI4IHOTa	Construct	I-495 HOT Lanes Interchange	NB to EB, NB to WB, EB to SB, and WB to SB	@ VA 620 (Braddock Road)	1	1	-	-	Yes	2013 2030

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

MEMORANDUM

February 14, 2012

To: Transportation Planning Board

From: Ronald F. Kirby
Director, Department of
Transportation Planning

Re: Review of Comments Received and Recommended Responses on Project Submissions for Inclusion in the Air Quality Conformity Assessment for the 2012 CLRP and FY 2013-2018 TIP

At the January 18, 2012 meeting, the Board was briefed on the project submissions for the draft 2012 Financially Constrained Long Range Transportation Plan (CLRP) and the FY 2013-2018 Transportation Improvement Program (TIP), which were released for public comment and agency review at the TPB Citizens Advisory Committee (CAC) meeting on January 12, 2012. This public comment period closed on February 11.

Public comments submitted by individuals and organizations were posted as they were received to the TPB website at www.mwcog.org/transportation/public/comments.asp. This memorandum provides recommended responses to the two comments received through the close of the public comment period on February 11.

The Board will be briefed on the comments received and recommended responses at the February 15 meeting.

Comments and Responses

One comment (A, below) was received from an individual who proposed a Route 28 Bypass as an alternative to the Manassas National Battlefield Park Bypass (MBB). The other comment (B, below) was a February 10 letter (attached) from the Coalition For Smarter Growth, the Southern Environmental Law Center, the National Parks Conservation Association, and the Piedmont Environmental Council which includes numerous comments.

A. Proposed Alternative to the Manassas National Battlefield Park Bypass

Comment: A Route 28 Bypass would provide better congestion relief for Manassas residents than the MBB.

Response: The purpose of the Battlefield Bypass is to remove non-park traffic from the Battlefield and the Route 28 bypass has a different purpose and need. While it will relieve area traffic congestion, it will not remove non-park traffic from the battlefield.

B. Comments in a February 10, 2012 Letter from the Coalition For Smarter Growth, the Southern Environmental Law Center, the National Parks Conservation Association, and the Piedmont Environmental Council

1. *Do not include the MBB in the CLRP and remove the Tri-County Parkway, and instead include a specific package of alternatives.*

Response: This package of alternatives was responded to in June 2005 in the Draft Environment Impact Statements (EIS) for both the MBB and the Tri-County Parkway. See the comments and responses numbered 2-8 below on the efficacy of the package of alternatives as addressed in the EISs.

The Tri County Parkway has been in the CLRP since 2004 and has completed a number of studies including a DEIS and is now close to completing the FEIS. The DEIS examined a number of alternatives, including No Build, and identified the locally preferred alternative that provided the best balance between meeting the purpose and need of the project and minimizing all impacts from the project. The key elements of the project's purpose and need include: improve access and reduce congestion by improving transportation mobility and capacity; enhance the linkage of communities and the transportation system serving the communities; improve safety; accommodate social, economic and environmental goals. As part of identifying and selecting the preferred alternative three public hearing were held, and comments similar to the comments today were considered and responded to. The DEIS and the preferred alternative was approved in 2005. The Tri County Parkway project that is in the current CLRP is the approved and preferred alternative. As part of finalizing the EIS with a FEIS, additional analyses on the preferred alternative and a detailed impact on, among other things, the environment, historic resources, and parkland has been conducted. The FEIS is scheduled to be completed later this year. Working with the National Park Service (NPS) and the FHWA and co-locating parts of the Manassas Battlefield Bypass with the Tri County Parkway will reduce overall impacts to both the Park and Historic District as there will not be two separate facilities in the same area.

2. *Addressing east-west traffic (which accounts for the vast majority of traffic in this area) by improving I-66, including the extension of HOV and bus lanes;*

Response: This was not directly evaluated in the Bypass DEIS, but NPS believes that it was part of the study titled "I-66 Major Investment Study" completed in 1999 which included improvement options for I-66 corridor. The study included improvements such as:

- Extend Metrorail in the corridor to the Centreville area
- Construct barrier-separated, reversible HOV lanes from the vicinity of the future Tri-County Parkway (crossing I-66 in Fairfax County near the Fairfax/Prince William border) to I-495

- Add one general purpose lane in each direction from US Route 50 to I-495
- Convert the existing, peak-period, concurrent HOV lane to a general purpose lane between the future Tri-County Parkway (or western terminus of the barrier separated HOV facility) and US Route 50
- Continue to evaluate barrier-separated HOV lanes between US Route 29 (Gainesville) to the future Tri-County Parkway
- Increase bus service in the study area
- Develop 4 to 6 transit centers/park-and-ride facilities
- Increase peak period Metrorail service frequency from Vienna to the east, and add express Virginia Railway Express (VRE) service on the Manassas line.

VDOT has recently initiated two other studies that will evaluate the I-66 corridor.

3. *Funding and expanding the capacity of the Gainesville Interchange in order to allow traffic to flow more smoothly to and from I-66;*

Response: This interchange is outside the scope and the purpose and need identified in the DEIS for the Battlefield Bypass. However, the NPS understands that VDOT has expended significant resources at this intersection to improve the interchange. To date they have committed a total of \$435 million dollars on four projects that consists of a series of major improvements that include:

- First was the construction of University Boulevard, a 1.3-mile, four-lane road connecting Route 29 and Wellington Road which opened in 2006 at a cost of \$18 million.
- Second was widening 3.3 miles of I-66 to eight lanes from Route 234 Business/Sudley Road to the Route 234 Bypass. Construction was completed in 2006 and the cost was \$46 million.
- Third was widening 2.5 miles of I-66 to eight lanes from the Route 234 Bypass to Route 29 at Gainesville at a cost of \$103 million.
- Fourth is the Route 29 and Linton Hall Road overhaul, at a cost of about \$267 million.

http://www.virginiadot.org/projects/northernvirginia/gainesville_improvements.asp

Even with all these improvements by VDOT, the amount of non-park related traffic within the Battlefield has not been reduced.

4. *Co-locating Route 29 onto the improved I-66 to allow Route 29 to be closed through the Battlefield;*

Response: This alternative was evaluated in the DEIS – under this alternative, traffic now traveling on US 29 would be co-located onto I-66 with an additional two lanes (one in each direction) between Centreville and Gainesville. This alternative provided a north/south route for VA 234 traffic on the western edge of the Battlefield parallel to Pageland Lane. Three design options were provided between the portion located approximately 1 mile north of US 29 and the existing VA 234 near Sudley Park Site.

This alternative was eliminated because VDOT expressed concerns that co-locating traffic onto I-66 under any scenario would cause backups at the locations where the new lanes would merge with I-66 traffic creating several choke points. For I-66 to perform properly, VDOT estimated that the two lanes would need to continue to the Capital Beltway. Also, none of the local comprehensive plans currently support co-location of US 29 onto I-66 and, the full capacity of the I-66 right-of-way is already planned for improvement based on demand within the I-66 corridor.

This was also studied in the I-66 Major Investment Study and the US Route 29 Corridor Development Study.

5. *Upgrading Pageland Road west of the Battlefield with shoulders, roundabouts at intersections, and turn lanes onto Route 29 so that it could carry the traffic using Route 234 through the Battlefield;*

Response: This was evaluated in the DEIS and was included as part of a build alternative alignment that became the preferred alternative. As a stand-alone alternative, improvements to Pageland Lane alone would not meet the purpose and need of the Battlefield Bypass. While eliminating traffic on VA 234, traffic along US 29 would continue and possibly increase. The suggestion to make modifications to Pageland Lane would closely align to what is being proposed by the Tri-County Parkway without meeting the needs of the Bypass to remove traffic from the Battlefield and would eliminate the ability to close US 29 through the Battlefield.

6. *Funding and completing the upgrade of Route 28 to improve access from the I-66 corridor to the major job concentrations east of Dulles Airport;*

Response: This is outside the scope and the purpose and need identified in the DEIS for the Battlefield Bypass. Improvements to the Route 28 corridor are predicted to reduce congestion in the area adjacent to the Battlefield, but will not meet the purpose and need of the Battlefield Bypass to develop alternatives that will allow for the closure of portions of US 29 and VA 234 which transect the park and to provide alternatives for the traffic currently traveling through park boundaries.

The NPS understands that VDOT has signed a Comprehensive Agreement with The Clark Construction Group, Inc. and its road and bridge construction subsidiary, Shirley Contracting Company, LLC to develop, design and build six high-capacity grade-separated interchanges on Route 28 in Fairfax and Loudoun Counties. The agreement provided a combined commitment of \$200 million in improvements to the Route 28 corridor over the next four years. Ultimate plans call for constructing a total of 10 interchanges and widening Route 28 from six to eight lanes between Route 7 and Interstate 66. The initial six interchange upgrades included Route 606, Route 625 and Sterling Boulevard in Loudoun County, and Air & Space Museum Parkway (formerly Barnsfield Road), Westfields Boulevard and McLearen Road in Fairfax County. Route 28 Corridor Improvements, LLC (the Clark/Shirley team) is responsible for right-of-way acquisition, utility relocation, site development, design and construction services. The Route 28 project scope includes widening Route 28 to eight (8) lanes (as yet unfunded) and constructing secondary road improvements on Centreville Road (complete), Atlantic Boulevard (under construction), Loudoun County Parkway (complete), Davis Drive (complete) and two (2) sections of Pacific Boulevard (complete).

7. *Extending Virginia Railway Express to Gainesville and Haymarket, and improving bus transit along Route 50 in Loudoun County, I-66, and Route 28;*

Response: This is outside the scope and the purpose and need identified in the DEIS for the Battlefield Bypass. While these improvements may assist in reducing congestion, they will not meet the purpose and need of the Battlefield Bypass to develop alternatives that will allow for the closure of portions of US 29 and VA 234 which transect the park and to provide alternatives for the traffic currently traveling through park boundaries.

8. *Targeting local road and safety improvements to cost-effectively reduce incidents in the high accident sections.*

Response: Transportation System Management improvements were evaluated in the DEIS but were eliminated because such improvements failed to provide a viable option for traffic now traveling through the park on either US 29 or VA 234.

9. *Ensure that the MBB is clearly defined and mapped in the CLRP as including the closure of Route 29 and Route 234*

Response: The MBB will be coded in the CLRP network with Route 29 and Route 234 through the Battlefield closed for the air quality conformity analysis.

10. *Whether labeled the MBB or the TCP, this proposed stretch of new highway would slice through the Battlefield Historic District and be directly adjacent to the scene of fierce fighting in the Second Battle of Manassas.*

Response: Congress explicitly directed the NPS to work with VDOT to build a road and where that road should be constructed in Public Law 96-442 Section 2c: “if the Virginia Department of Highways and Transportation determines that the proposed Route 234 bypass should be properly located between the Virginia Electric Power Company powerline easement and Route 705, the Secretary shall make available the land necessary for such bypass, subject to such revisions, terms, and conditions as the Secretary deems are necessary and appropriate to assure that such bypass is located, constructed, operated, and maintained in a manner consistent with the administration of the park.”

From a Section 4(f) perspective with respect to harm to the Battlefield, there is significantly more harm to the Battlefield from roads overflowing with non-park traffic located in the heart of the Battlefield than from roads and traffic congestion of the periphery of the Battlefield.

11. *Lack of Enforceable Commitment to Close Route 29 and Route 234*

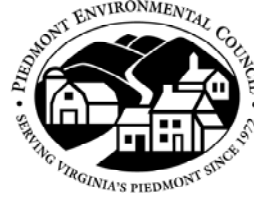
Response: The NPS has received notable support from a variety of public entities and state commitments to closure of US 29 and VA 234 once the Battlefield Bypass has been constructed. The Battlefield Bypass is being viewed as a replacement facility for US 29 and VA 234, and traffic analysis has supported this objective.

- In November 2005, the Prince William Board of Supervisors issued a resolution endorsing the refined Alternative D for the Battlefield Bypass and stated that the Board intended for the closure of US 29 and VA234
- In December 2005, the Fairfax County Board of Supervisor stated that they supported the refined Alternative D and that they would also support the closure of US 29 and VA 234 once the Battlefield Bypass was completed.
- In June 2006, the Commonwealth Transportation Board (CTB) passed a resolution approving the location of the proposed bypass along the Modified Alternative D corridor. This resolution also stated that the Board would agree to the closure of Routes 29 and 234 with the completion of the Battlefield Bypass.
- In August 2011, in correspondence to NPS, VDOT has stated commitments to close VA 234 through the park and traffic calming on US 29. NPS is working with VDOT on a draft Programmatic Agreement which also states the commitment to the closure of VA 234 with the completion of the Tri-County Parkway and traffic calming on US 29.

- 12.** *The location of the MBB and the TCP within the newly-designated, 50-mile long "Corridor of Statewide Significance" from I-95 in Stafford County to Route 7 in Loudoun County raises serious concerns that these two projects will serve as links in an "Outer Beltway" intended to funnel truck freight to Dulles Airport. This will bring even greater pressure to bear on the Battlefield and nearby resources and is further reason to oppose these two highway proposals.*

Response: The Battlefield Bypass is not related to the "Outer Beltway". The intention is, as requested by Congress, to develop alternatives that will allow for the closure of the portions of US 29 and VA 234, which currently transect the Battlefield and to provide alternatives for traffic currently traveling through the park. In the Battlefield Bypass DEIS the Bypass is characterized as a limited access facility with much of the land along the proposed route having development constraints (sections located within the park or along Bull Run) or have areas zoned for low-density rural residential development. The mobility effects of the Bypass are expected to be only a minimal factor in future development decisions, because travel time analysis indicates that travel along any of the alternatives will take the same amount of time as the current travel time along existing routes. Thus, the Bypass would not substantially improve access to undeveloped land.

In addition NPS has gotten commitments from VDOT in recent correspondence and in a Draft Programmatic Agreement to fund the purchase of conservation easements on properties within the Tri-County Parkway corridor to protect the Tri-County Parkway corridor from further development.



COALITION FOR
SMARTER GROWTH



National Parks Conservation Association®
Protecting Our National Parks for Future Generations®

February 10, 2012

National Capital Region Transportation Planning Board
Metropolitan Washington Council of Governments
777 North Capitol Street NE, Suite 300
Washington, DC 20002-4239
TPBPublicComment@mwcog.org

Re: Comments on Constrained Long Range Plan and TIP Air Quality Conformity Inputs

Dear Members of the Transportation Planning Board:

We are writing to strongly oppose inclusion of the proposed Manassas National Battlefield Park Bypass (MBB) in the update to the Constrained Long Range Plan (CLRP). Although we support the goal of closing the portions of Route 29 and Route 234 that currently transect the Manassas National Battlefield Park (Battlefield), there are better alternatives—set forth below—for achieving this goal that do not require surrounding the Park on all sides by major highways.

Similarly, we urge you to remove the Tri-County Parkway (TCP) from the CLRP. The proposal for the MBB states that the north-south segment of the project—which would inflict irreversible harm on the western side of the Battlefield and slice through the Manassas Battlefield Historic District—would be co-located with the TCP as a way to pay for part of the MBB using non-federal funding sources. However, the less damaging alternatives set forth below would also satisfy any purported need for the TCP. As a result, the TCP should be pursued neither independently nor as a way to advance the MBB.

Rather than include these two unnecessary highway projects in the CLRP, we urge you to add to the CLRP the package of alternatives set forth below and to include these alternatives in the air quality conformity analysis.

At the very least, we urge to ensure that the MBB is clearly defined and mapped in the CLRP as including the closure of Route 29 and Route 234 through the Battlefield, and that the air quality conformity modeling is coded to show those roads as closed.

Impact to Historic Resources:

Although the goal of the MBB—removing traffic from the Battlefield—is laudable, the MBB would result in the Battlefield being surrounded on all sides by major highways. The preferred alternative that emerged from the Draft Environmental Impact Statement (DEIS) and which is being proposed for inclusion in the CLRP calls for a new 4-lane highway to loop around the Battlefield through undeveloped lands on its northern, eastern and western borders. Further, the route slices through the Manassas Battlefield Historic District west of the Battlefield before looping back down through the northeastern corner of the Battlefield, effectively severing an important piece of this monument and irreversibly impacting important historic resources.

On July 23 and 24, 2011, thousands of Civil War reenactors honored the 150th Anniversary of the First Battle of Manassas. The reenactment took place within sight of the proposed highway corridor on the western boundary of the Battlefield—the same portion of the MBB that is proposed to be co-located with the TCP. Whether labeled the MBB or the TCP, this proposed stretch of new highway would slice through the Battlefield Historic District and be directly adjacent to the scene of fierce fighting in the Second Battle of Manassas. The nation will honor that second battle this year.

Availability of A Less Damaging, Reasonable Alternative:

In our June 2005 comments on the Draft Environmental Impact Statements for both the MBB and the TCP, our groups first offered a comprehensive set of alternatives that combined regional and local transportation and land use improvements that would meet the projects' needs while also minimizing the impact on the Battlefield. The combination of transportation and land use measures includes:

- Addressing east-west traffic (which accounts for the vast majority of traffic in this area) by improving I-66, including the extension of HOV and bus lanes;
- Funding and expanding the capacity of the Gainesville Interchange in order to allow traffic to flow more smoothly to and from I-66;
- Co-locating Route 29 onto the improved I-66 to allow Route 29 to be closed through the Battlefield;
- Upgrading Pageland Road west of the Battlefield with shoulders, roundabouts at intersections, and turn lanes onto Route 29 so that it could carry the traffic using Route 234 through the Battlefield;
- Funding and completing the upgrade of Route 28 to improve access from the I-66 corridor to the major job concentrations east of Dulles Airport;
- Extending Virginia Railway Express to Gainesville and Haymarket, and improving bus transit along Route 50 in Loudoun County, I-66, and Route 28; and
- Targeting local road and safety improvements to cost-effectively reduce incidents in the high accident sections.

This comprehensive approach avoids or minimizes the harm to the Battlefield and the Historic District that the MBB and TCP would inflict while also providing alternatives for the traffic that currently uses Route 29 or Route 234 through the Battlefield. It also focuses scarce resources on the dominant movement of east-west commuter traffic and allows for local traffic movement and accessibility.

We urge you to remove the TCP from the CLRP, and not to include the MBB in the first place. Instead, we urge you to consider this less damaging package of alternatives for inclusion in the CLRP and the air quality conformity modeling.

Lack of Enforceable Commitment to Close Route 29 and Route 234:

In addition to the unnecessary damage that the MBB and TCP would cause and the availability of better alternatives, there is no assurance that building these two projects would even result in closure of Route 29 and Route 234 through the Battlefield—the ostensible purpose of the MBB.

The proposal for the MBB points to the Manassas National Battlefield Park Amendments of 1988 (referred to as Public Law 100-647) as mandating an environmental study for the MBB project. Significantly, that law requires that “[t]he study shall specifically consider and develop plans for the closing of those public highways (known as route 29 and 234) that transect the park and shall include analysis of the timing and method of such closures....” This requirement does not appear to have been addressed in the DEIS, and we are unaware that any of the federal or state agencies involved have put forward to date a reliable and enforceable means of closing those two roads. The failure to meet this obligation is further reason why the MBB should not be added to this update of the CLRP. Without an enforceable legal commitment to close the roads, the addition of new highways looping around the western, northern and eastern borders of the Battlefield—and the resulting sprawl development—will likely result in exponentially magnified harm to this historic resource.

Future, Foreseeable Threats Pose Even Greater Risk to Battlefield:

Finally, the location of the MBB and the TCP within the newly-designated, 50-mile long “Corridor of Statewide Significance” from I-95 in Stafford County to Route 7 in Loudoun County raises serious concerns that these two projects will serve as links in an “Outer Beltway” intended to funnel truck freight to Dulles Airport. This will bring even greater pressure to bear on the Battlefield and nearby resources and is further reason to oppose these two highway proposals.

In closing, we respectfully urge you:

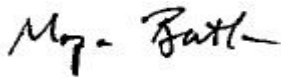
- Not to include the Manassas National Battlefield Park Bypass in the CLRP;
- To remove the Tri-County Parkway from the CLRP;
- Include instead in the CLRP and the air quality conformity modeling the package of alternatives outlined above; and

- If you do decide to add the MBB to the CLRP, to ensure that the MBB is clearly defined and mapped in the CLRP as including the closure of Route 29 and Route 234 through the Battlefield, and that the air quality conformity modeling is coded to show the roads as closed.

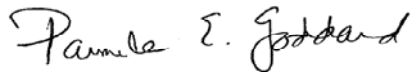
Sincerely,



Stewart Schwartz, Executive Director, Coalition for Smarter Growth



Morgan W. Butler, Senior Attorney, Southern Environmental Law Center



Pamela E Goddard, Chesapeake and Virginia Program Manager, National Parks Conservation Association



Chris Miller, President, Piedmont Environmental Council